**Quality
Innovation
Performance**

Accreditation
Report

QIP Safeguarding: Accreditation Report

Assessment Details	
Organisation name	Catholic Diocese of Parramatta
Organisation primary address	Bethany Centre 470 Church Street Parramatta NSW 2150
Organisation ID	SAFE1001
CEO / Executive Contact	Father Peter Williams
Accreditation Contact	Tracy McLeod Howe
Standards	*QIP Safeguarding Standards for Children and Vulnerable Adults (Pilot Edition)*
QIP Assessment Team Leader	Kevin McLaughlin
QIP Assessor(s)	Peter Frendin
On-site assessment	Wednesday 18 May 2022 – Friday 20 May 2022

Accreditation Status	
Accreditation Decision	Accredited
Decision Panel Member	Dr Nicole Mckenzie
Decision Panel Member signature	*Nicole Mckenzie*
Accreditation commencement	Wednesday 14 September 2022
Accreditation expiry	Sunday 14 September 2025
Mid-cycle assessment due	Thursday 14 March 2024

This assessment was conducted according to the requirements of the *QIP Safeguarding Standards for Children and Vulnerable Adults (Pilot Edition)* accreditation program.

Foreward

Accreditation is independent recognition that an organisation, practice, service, program or activity meets the requirements of defined criteria and/or standards. Accreditation provides quality and performance assurance for owners, managers, staff, funding bodies and consumers.

The achievement of accreditation is measured against the sector-specific Standards which have been set as the minimum benchmark for quality. Compliance with the Standards is demonstrated through an independent assessment.

Accreditation can help an organisation:
- Provide independent recognition that the organisation is committed to safety and quality
- Foster a culture of quality
- Provide consumers with confidence
- Build a more efficient organisation using a systematic approach to quality and performance
- Increase capability
- Reduce risk
- Provide a competitive advantage over organisations that are not accredited, and
- Comply with regulatory requirements, where relevant.

Continuous quality improvement (CQI) underpins all QIP accreditation programs and the organisation through:
- Looking for ways to improve as an essential activity of everyday practice
- Consistentlyly achieving and maintaining quality care that meets client needs
- Monitoring outcomes in client care and seeking opportunities to improve both the care and its results
- Constantly striving for best practice by learning from others to increase the efficiency and effectiveness of processes

The following report is based on an independent assessment of the organisation's performance against the *QIP Standards for Safeguarding Children and Vulnerable Adults (Pilot Edition)*. The report includes compliance level ratings for each indicator, criteria and standard and includes explanatory notes for key findings. Where an indicator is not rated as 'Met', corrective action is specified.

Assessment Ratings

The following levels of attainment are used consistently throughout this report to give an overall rating for each Standard. The levels of attainment are:
- Met
- Not Met

In order to meet accreditation requirements, all mandatory Indicators must be met.

Executive Summary

Scope of Service

The scope of this report and the accreditation is described by the agreed 'Scope of Service' signed by the organisation and the licensed provider, the central elements of which are set out below.

Organisation

Catholic Diocese of Parramatta

Programs in scope for assessment

Chancery Office
Ministry Enhancement Team
Diocesan Development Fund

Organisational structure

The Catholic Diocese of Parramatta (the Diocese) is governed by the Curia, headed by Bishop Vincent Long, supported by the Vicar General and a diverse number of professional and corporate staff. The Chancery, which is the focus of this assessment along with the Ministry Enhancement Team and the Diocesan Development Fund, is the administrative branch of the Diocese.

Site(s)

Bethany Centre, 470 Church Street, Parramatta NSW 2150

Exclusions

Parishes of the Catholic Diocese of Parramatta

Interviews conducted

Interviews included:
- Curia. Bishop Long and four members
- CEO/CFO
- Senior staff (6)
- Office of Safeguarding (5)
- Department Heads (6)
- Stakeholders (5)
- Volunteers (5)
- Safeguarding Council (5)

Organisational context

The Diocese is a suffragan diocese of the Archdiocese of Sydney. It comprises 46 parishes each led by a Parish Priest, and one parochial district, led by a deacon. It is organised into 6 deaneries, each coordinated by a Dean. Its current Bishop, the fourth in its history, is Bishop Most Reverend Vincent Long Van Nguyen OFM Conv DD STL, installed as the Bishop of Parramatta at St Patrick's Cathedral, Parramatta, on 16 June 2016.

Seven local government divisions comprise the Diocese: Baulkham Hills Shire, Blacktown City, the City of the Blue Mountains, Hawkesbury Shire, the Municipality of Holroyd, Parramatta City and Penrith City and parts of Wollondilly and Liverpool. The area encompasses the lands of the Darug people

The Diocese nurtures the spiritual lives of the hundreds of thousands of Catholics in its care and supports thousands more in the local community. Its Catholic education system is committed to giving every student a quality education, while CatholicCare and its other agencies and ministries work alongside local people and organisations committed to enhancing the way of life in Western Sydney.

Quality Improvement Plan

As the organisation is in their first cycle of accreditation, a Quality Improvement Plan is not applicable.

Acknowledgement

The Diocese of Parramatta is to be congratulated for stepping forward to be assessed against the pilot edition of the QIP Standards for Safeguarding Children and Vulnerable Adults. The Assessment Team would like to acknowledge the extensive preparation the Diocese undertook in preparation for this assessment. Management and staff were open and helpful in providing information throughout the process.

Special thanks go to Tracy McLeod Howe and Maria Kervin who prepared the evidence for the assessment and arranged the timetable and interviews across the time on-site. The Assessment Team would like to thank all involved in this assessment and the effort involved, which is a testament to The Diocese's commitment to continuous quality improvement.

The Assessment Team wish Bishop Long and his team very success as the Diocese implements these recommendations to become an even stronger organisation within the community it serves.

Assessment summary

Strengths include:
- Establishment of the Office of Safeguarding
- Organisational culture around safeguarding
- Diversity and cultural awareness including clients with disability and cognitive impairment
- Policy and Procedure development
- Information management including privacy and confidentiality
- Staff supervision

Areas for development include:
- Continuous Quality Improvement
- Record keeping to ensure consistency across the organisation
- Broad participation in decision-making
- Risk management, including risk identification and mitigation
- Stakeholder consultation
- Continuing education and training and training
- Fine-tuning of complaints policies and procedures

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Summary of Ratings

Standard 1 – Governance, leadership and organisational culture

Overall rating: **Met**

Criterion	Rating
1.1 Organisational culture	Met
1.2 Policies and procedures	Met
1.3 Legal, professional and ethical obligations	Met
1.4 Continuous quality improvement	Met
1.5 Record keeping	Met
1.6 Privacy and confidentiality	Met
1.7 Information sharing	Met

Standard 2 – Equity, diversity and cultural awareness

Overall rating: **Met**

Criterion	Rating
2.1 Promotion of equity, diversity, and cultural awareness	Met
2.2 Respect, acknowledge and welcome	Met

Standard 3 – Understanding rights and participation

Overall rating: **Met**

Criterion	Rating
3.1 Participating in decisions	Met
3.2 Disability, diminished capacity and/or cognitive impairment	Met

Standard 4 – Participation of families, guardians, carers, support communities and the broader community

Overall rating: **Met**

Criterion	Rating
4.1 Informed participation	Met

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Standard 5 – Knowledge, skills, training and supervision

Overall rating: **Met**

Criterion	Rating
5.1 Qualifications	Met
5.2 Continuing education and training	Met
5.3 Supervision and line management processes	Met

Standard 6 – Risk management

Overall rating: **Met**

Criterion	Rating
6.1 Prevention, identification and mitigation of risk	Met
6.2 Physical and online environments	Met

Standard 7 – Responding to complaints or concerns

Overall rating: **Met**

Criterion	Rating
7.1 Complaint policies and processes	Met
7.2 Prevention of harm	Met
7.3 Legislative requirements	Met
7.4 Supporting victims and survivors	Met
7.5 Policy review	Met

Summary of Quality Improvement Opportunities

Opportunities

Quality Improvement Opportunities are recommendations made by the assessment team. These recommendations can relate to how an organisation can improve in meeting a particular indicator, criterion, or standard or can be of a generalised nature whereby the organisation could improve.

These recommendations are optional, and if agreed to by the organisation, are included in the Quality Plan that is to be submitted by the organisation in the monitoring phase of the accreditation cycle.

Criterion	Recommendation	
1.2 Policies and procedures	1.5.5	While there is some stakeholder consultation regarding the development of policies and procedures, this appears to be limited to other agencies within the Diocese. The Diocese of Parramatta should review its stakeholder consultation process to identify a wider range of stakeholders to invite comment from in the development of safeguarding policies and procedures.
1.4 Continuous quality improvement	1.4.1	While there is evidence of quality management activities, it is not clear if there is a quality management framework to guide such activities. The Diocese should review its approach to quality management and develop a framework to guide quality management and continuous quality improvement throughout the organisation.
	1.4.2	While there is evidence of quality management activities, it is not clear if there is a quality management framework to guide such activities. The Diocese should review its approach to quality management and develop a framework to guide quality management and continuous quality improvement throughout the organisation.
1.5 Record keeping	1.5.3	While staff interviewed referred to their individual record-keeping style, it was not clear that this is consistent across the service. The Diocese should review its record-keeping procedures to ensure it is consistent across the service or relevant to specific programs.
	1.5.5	While there are policies and systems in place to store files and to access archived material there is no specific reference to how records should be managed/retained in relation to delayed disclosure by victims, removal of limitation periods for civil actions in relation to child abuse, the need to be able to demonstrate in future that the organisation has taken reasonable

		steps to prevent harm to children and adults, and any relevant legal obligation to retain such records. Consider including within the Safeguarding Policy and Records Management Policy specific reference to how records should be managed/retained in relation to delayed disclosure by victims, removal of limitation periods for civil actions in relation to child abuse, the need to be able to demonstrate in future that the organisation has taken reasonable steps to prevent harm to children and adults, and any relevant legal obligation to retain such records.
2.1 Promotion of equity, diversity, and cultural awareness	2.1.2	Whilst the commitment to equity and diversity is stated in some documents and at orientation for new staff, this is not strongly reflected in planned training. The Diocese should develop a future training plan that covers the governing body and all personnel to increase their understanding of equity diversity, and cultural difference. Equity, diversity, and cultural differences should also be included in policies as they are reviewed.
3.1 Participating in decisions	3.1.2	While vulnerable adults have some opportunity to have their voices heard when attending programs there is no systemic approach to provide them with the opportunity to express their views and participate in decisions that affect their lives. The Diocese should review its approach to client and community engagement and participation to ensure vulnerable adults have the opportunity to express their views and participate in decisions that affect their lives. Data extrapolated from the CFEP Surveys survey report could be taken into consideration in this context.
4.1 Informed participation	4.1.1	The Diocese should use the results and associated report from CFEP Surveys to assist in incorporating feedback into their practice.
	4.1.2	The Diocese should use the results and associated report from the CFEP Surveys to assist in incorporating feedback into their practice.
	4.1.3	While there is some evidence that the Diocese engages with a number of partners, it is not clear how the outcomes from such engagement is used to inform policies and practices. The Diocese should use the results and associated report from the CFEP Surveys to assist in incorporating feedback into their practice.
5.2 Continuing education and training	5.2.2	While there is evidence that staff receive training in safeguarding, privacy, abuse and reportable conduct it is not clear if this is provided to all personnel as required in the Standard.

		The Diocese should review its staff training schedule regarding safeguarding, privacy, abuse, and reportable conduct to ensure it captures all personnel.
	5.2.3	While staff received training in a number of issues relating to safeguarding it was not clear to the assessment team that this includes recognition of disclosures, grooming, and signs of abuse. The Diocese should review the content of its safeguarding training to ensure it includes recognitions of disclosures, grooming, and signs of abuse.
	5.2.4	While the Diocese has a person-centered approach in terms of assessment and care planning, and are trained in this. It is not clear that such training includes how to respond to disclosures of abuse. The Diocese should review its person-centered approach training, and other relevant training to ensure responding to disclosures of abuse is included.
	5.2.6	While there is extensive training in issues relating to overall governance it is not clear if this includes how to respond to disclosures of abuse. The Diocese should review all training, including governance training, to ensure responding to disclosures of abuse is included.
6.1 Prevention, identification and mitigation of risk	6.1.2	While there is evidence of risk-related data being collected it is not clear that there is collection and analysis of data relating to risk to children and vulnerable adults. The Diocese should review its data collection and analysis processes to ensure data relating to risk to children and vulnerable adults is included.
	6.1.4	The Diocese may wish to consider developing more specific documentation around how children and adults with harmful behaviours are managed beyond the risk assessment stage.
6.2 Physical and online environments	6.2.2	While there are policies and processes in place to cover risk in the online environment it is not clear that there is a specific reference to children and vulnerable adults. The Diocese should review policies and procedures relating to safety in the online environment and, where necessary, include reference to the safety of children and vulnerable adults.
7.1 Complaint policies and processes	7.1.1	While there is evidence of ongoing work in relation to updating flowcharts and other documentation, a number of flowcharts presented to the assessment team did not show an update date or evidence of version control. The Diocese should review its documentation review processes to ensure the date of review and the current version is included.

	7.1.8	Given the Office of Safeguarding oversees contact with alleged or convicted perpetrators, there is a need to strengthen existing practices to separate services provided by its staff to both victims and perpetrators. The Diocese should develop a framework and associated policies that strengthen the "firewall" within the Safeguarding Office between services provided to victims and perpetrators.
	7.1.11	The Diocese should develop and communicate a standalone Conflict of Interest Policy, or expand on the material relating to conflicts of interest already contained in the Safeguarding Policy.
	7.1.11	The Diocese should review policies and procedures to strengthen the "firewall" between staff in the Office of Safeguarding who deal with victims and perpetrators to ensure there is no real or perceived conflict of interest.
	7.1.13	While the Diocese responds well to clear cases of harmful behaviours, it could strengthen its response when concerns are less obvious. The Diocese should consider strengthening its reponse if concerns are first raised informally.

Standard 1 – Governance, leadership and organisational culture

The organisation's governance, leadership, and organisational culture is committed to providing an environment in which children and vulnerable adults are safe and respected, and can trust that they will be protected when engaging with the organisation.

Criterion	**1.1 Organisational culture** The safety and wellbeing of children and vulnerable adults is embedded in the organisation's leadership, governance, and organisational culture, and is promoted with integrity and accountability			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
1.1.1	The organisation makes a public commitment to the safety and wellbeing of children and vulnerable adults, and leaders champion a culture of safety both inside and outside the organisation.	Met	The Parramatta Way Statement (an overarching document), created in consultation with the community, is displayed on the Diocese website and can be accessed by the public. The statement includes a definition of 'Safeguarding' and acknowledges the safety and wellbeing of children and vulnerable people is paramount throughout the organisation. A copy of the statement is being prepared for display in the reception area of the Bethany Centre.	Met
1.1.2	The safety of children and vulnerable adults is a shared responsibility at all levels of the organisation. All personnel understand their safeguarding obligations.	Met	There is a Safeguarding Policy that clearly states safeguarding is the responsibility of all staff. All staff interviewed demonstrated an understanding of their safeguarding obligations. A training program relating to safeguarding is being rolled out; of which volunteers are included in the program.	Met
1.1.3	The organisation has designated leadership and other personnel roles with specified	Met	An Office of Safeguarding has been established to provide leadership in the promotion of safety and	Met

	safeguarding responsibilities in relation to all aspects of the safeguarding continuum, from prevention to response.		wellbeing; the organisational chart shows clear lines of responsibility. In addition to the Office, a Safeguarding Council has been established, of which, meets bi-monthly.	
1.1.4	Conflicts of interest are identified, reported, and effectively managed in relation to all aspects of the safeguarding continuum, from prevention to response.	Met	The Diocese Code of Conduct shows how conflicts of interest are identified and managed. Conflicts of interest must be declared and are taken into account at points such as recruitment and selection.	Met

Criterion	**1.2 Policies and procedures** Policies and procedures document how the organisation ensures the safety of children and vulnerable adults.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
1.2.1	The organisation adheres to a safeguarding policy, and associated policies and procedures, that prioritise the safety and wellbeing of children and vulnerable adults and set out how the organisation works to prevent, identify and respond to incidents and risk of abuse.	Met	The Safeguarding Policy has a trauma-informed care approach and is applicable to anyone employed by, or engaged, in the work of the Diocese. It is a comprehensive document that covers risk management, roles and responsibilities, recruitment, training and response.	Met
1.2.2	The development of policies and procedures is informed by best practice models and stakeholder consultation.	Met	The Safeguarding Policy reflects all applicable legislation and is developed with input from stakeholders. *Improvement Opportunity* While there is some stakeholder consultation regarding the development of policies and procedures, this appears to be limited to other agencies within the Diocese.	Met

			The Diocese of Parramatta should review its stakeholder consultation process to identify a wider range of stakeholders to invite comment from in the development of safeguarding policies and procedures.	
1.2.3	Policies and procedures for the safeguarding of children and vulnerable adults are in place, accessible, and easy to understand.	Met	Policies and procedures are available to view on the shared drive of the Diocese, and a hyperlink within the Employee Handbook assists staff to navigate to these documents. The Employee Handbook also outlines roles and responsibilities of staff.	Met
1.2.4	The organisation adheres to, and requires all personnel to sign, a Code of Conduct which clearly sets out the organisation's requirements, expectations and consequences with respect to appropriate/inappropriate conduct with, towards, or in the presence of, children or vulnerable adults.	Met	There is a comprehensive Code of Conduct that applies to, and is signed by, all staff, and is included in employment contracts. The Diocese is currently developing a Contractor Handbook relating to safeguarding to further embed the concept of safeguarding into its work.	Met

Criterion	1.3 Legal, professional and ethical obligations The organisation enables and actively supports personnel to meet their legal, professional and ethical obligations for safeguarding.			
Rating	Met			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
1.3.1	The organisation establishes clearly identified and readily accessible pathways for internal reporting of, and organisational response to, safeguarding issues. These include alternative pathways to address circumstances where personnel or others may have concerns about or be reluctant or unable to access the	Met	There is a Complaints Management Policy that works in conjunction with the Child Protection Policy, the Youth Safety Manual, and the Whistleblower Policy and Procedure. The Policy is supported by flowcharts that address issues relating to both the complainant and the person subject of the allegation (PSOA).	Met

	organisation's usual reporting and response pathways.		The Complaints Management Policy also gives advice that if an individual remains dissatisfied with how their complaint was handled by the Diocese they may take their complaint to an external agency such as a court or industrial tribunal, the NSW Anti-Discrimination Board, or the Australian Human Rights Commission.	
1.3.2	The organisation is proactive in protecting and supporting personnel who come forward, in good faith, as reporters or whistle blowers.	Met	There is a standalone Whistleblower Policy and Procedure in place. This has been developed to encourage and support personnel to report an issue if they genuinely believe a senior staff member, or staff members, have breached the policies of the Diocese, or the law.	Met
1.3.3	The organisation's leadership and management promote a culture of continuous learning, for all personnel, to strengthen safeguarding practice.	Met	A mix of mandatory and elective safeguarding training is available to staff and volunteers. Training courses can be accessed via the Diocese website for staff, in both the Chancery and Parishes. All staff interviewed confirmed they were supported in accessing training.	Met

Criterion	1.4 Continuous quality improvement A culture of continuous quality improvement is upheld by the organisation.			
Rating	Met			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
1.4.1	The organisation's quality management processes are documented, implemented, communicated and reviewed.	Met	There is evidence that responsibility for quality management is spread throughout the organisation and is included in documents such as position descriptions and on the agenda of some committees.	Met

			Improvement Opportunity While there is evidence of quality management activities, it is not clear if there is a quality management framework to guide such activities. The Diocese should review its approach to quality management and develop a framework to guide quality management and continuous quality improvement throughout the organisation.	
1.4.2	Responsibility for leading and managing quality management is assigned, and those responsible are accountable.	Met	There is a Policy Development and Review Procedure which outlines the process for development and review, and responsibility is assigned at each stage of the process. New and reviewed policies are communicated to all staff via email and are made available on the Diocese website. *Improvement Opportunity* While there is evidence of quality management activities, it is not clear if there is a quality management framework to guide such activities. The Diocese should review its approach to quality management and develop a framework to guide quality management and continuous quality improvement throughout the organisation.	Met
1.4.3	There is a system for developing, mandating, implementing, communicating and reviewing policies and procedures.	Met	Policy development, review and distribution is guided by the Policy Development and Review Policy. In the Diocese this is led by the Office of Safeguarding.	Met
1.4.4	The organisation has integrated feedback processes that are documented, implemented,	Not Met	The Diocese uses a variety of methods to collect feedback; which includes surveys, program evaluation	Met

communicated and reviewed. Feedback is used to inform improvements.		and information feedback. One example of the use of feedback data is changes made to the 'Good Friday Night Walk' following feedback from participants. While there is some evidence of feedback being collected and used, there is no clear evidence of a systemic approach. ***Decision Panel Comment*** Subsequent to the assessment the Diocese has provided additional evidence to support the intent of this indicator. The Decision Panel agrees that this indicator has now been met. Supporting evidence included: • Student Leader Forum 2022 • eSafety Timetable • Combined data extrapolated from the *"Tell Them From Me"* (TTFM) Survey • Catholic Education (Diocese of Parramatta) website (Student Safety) • Catholic Outlook article titled *"Student leaders share mature conversations on online bullying and consent"*	

Criterion	**1.5 Record keeping** Good record keeping is prioritised as an essential component of a safeguarding culture.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
1.5.1	The organisation has a record keeping policy and processes which document how it creates, maintains and disposes of records that are, or may be, relevant to any aspect of the safeguarding continuum, from prevention to response.	Met	A comprehensive Records Management System Policy covers the creation, storage, access and deletion of files.	Met
1.5.2	The organisation's record keeping policy and processes require the creation and maintenance of reliable (complete and accurate) records relating to the safety and wellbeing of children and vulnerable adults, consistent with any applicable legal requirements.	Met	Client files are created as required and stored consistent with relevant legislation. This is informed by the Records Management System Policy.	Met
1.5.3	The organisation supports and enables all personnel to document matters concerning the safety and wellbeing of children and vulnerable adults to the extent that these matters arise in the course of their work, and in accordance with their specific responsibilities for overseeing or responding to such matters.	Met	Staff are trained in all aspects of record keeping, including at the point of induction to the service, and training records are maintained.

Improvement Opportunity
While staff interviewed referred to their individual record keeping style, it was not clear that this is consistent across the service.

The Diocese should review its record keeping procedures to ensure it is consistent across the service, or relevant to specific programs. | Met |

1.5.4	The organisation has a reliable and secure centralised record-keeping system for the storage of personnel and other records which are or may be relevant to any aspect of the safeguarding of children and vulnerable adults.	Met	There is a reliable and secure centralised record-keeping system. The system is only accessible by relevant and approved staff. Responsibility for records management is assigned according to a delegations manual or organisational chart. Records relating to safeguarding are in this system.	Met
1.5.5	Where records are no longer needed for operational purposes, the organisation's record keeping policy directs and guides personnel to ensure that records that are, or may be, relevant to the safety and wellbeing of children and vulnerable adults continue to be retained, taking into account: a) delayed disclosures by victims b) removal of limitation periods for civil actions in relation to child abuse c) the need to be able to demonstrate in future that the organisation has taken reasonable steps to prevent harm to children and adults d) any relevant legal obligations to retain such records.	Met	There is a Records Management Policy and a documented process for accessing archived material which notes there are some historic items that should not be photocopied without expert guidance. In these cases, permission should be granted by the Record and Archive Manager in collaboration with the Chancellor (Administration) before any action is taken. While there are policies and systems in place to store files and to access archived material there is no specific reference to how records should be managed/retained in relation to delayed disclosure by victims, removal of limitation periods for civil actions in relation to child abuse, the need to be able to demonstrate in future that the organisation has taken reasonable steps to prevent harm to children and adults, and any relevant legal obligation to retain such records. *Decision Panel Comment* It was agreed that the Diocese has provided sufficient evidence to meet this indicator. *Improvement Opportunity* Consider including within the Safeguarding Policy and Records Management Policy specific reference to	Met

			how records should be managed/retained in relation to delayed disclosure by victims, removal of limitation periods for civil actions in relation to child abuse, the need to be able to demonstrate in future that the organisation has taken reasonable steps to prevent harm to children and adults, and any relevant legal obligation to retain such records.	

Criterion	1.6 Privacy and confidentiality The organisation takes all reasonable steps to protect the privacy of personal information and confidentiality of sensitive information, while prioritising the safety and wellbeing of children and vulnerable adults.			
Rating	Met			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
1.6.1	The organisation's policies and processes promote the protection of privacy.	Met	The Privacy Policy outlines the commitment to protecting privacy and provides guidance on how to do this. The policy is supported by the Privacy Incident Management Procedure.	Met
1.6.2	The organisation's policies are informed by a clear understanding that privacy protection can, and sometimes must, be limited in order to protect the safety and wellbeing of children or vulnerable adults.	Met	The Safeguarding Policy explicitly prioritises the safety and wellbeing of children and vulnerable adults, but also make it clear that any limitation of privacy must be restricted to that which is reasonable, necessary and proportinate in the circumstances.	Met

Criterion	1.7 Information sharing The sharing of information to promote the safety and wellbeing of children and vulnerable adults is appropriate and timely.			
Rating	Met			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
1.7.1	The organisation requires, supports and enables personnel to share information both internally and externally, as necessary or appropriate, for the safety and wellbeing of children and vulnerable adults.	Met	Sharing of information both internally and externally, as necessary or appropriate, for the safety and wellbeing of children and vulnerable adults is outlined in the Safeguarding Policy.	Met
1.7.2	The organisation supports and facilitates information exchange with other organisations as part of a collaborative safeguarding culture.	Met	Information exchange with other organisations as part of a collaborative safeguarding culture is outlined in the Safeguarding Policy.	Met

Standard 2 – Equity, diversity and cultural awareness

The organisation actively anticipates that children and vulnerable adults are from a diverse mix of cultures, backgrounds, and life experiences and ensures that services and programs are inclusive, responsive, and respectful. The organisation provides personnel with opportunities to undertake training in equity, diversity and cultural awareness, and services and programs promote the physical, mental, emotional, spiritual, and cultural wellbeing of clients. The organisation uses appropriate communication methods to engage clients and the wider community and maintains links with relevant community groups.

Criterion	**2.1 Promotion of equity, diversity, and cultural awareness** Equity, diversity, and cultural differences are understood, respected, and promoted.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
2.1.1	The organisation makes a public commitment to respect and promote equity, diversity, and cultural difference.	Met	The Parramatta Way Statement specifically states the Diocese's commitment to diversity and cultural difference and is available on the Diocese website and will soon be hung in the foyer of the Bethany Centre. This commitment is reflected in staff training and documents viewed on site.	Met
2.1.2	The organisation's governing body and all personnel demonstrate knowledge and understanding of equity, diversity, and cultural difference.	Met	The commitment of staff from the Diocese to equity and diversity was evident through discussions held with staff at the time of the assessment onsite. *Improvement Opportunity* Whilst the commitment to equity and diversity is stated in some documents and at orientation for new staff, this is not strongly reflected in planned training,	Met

			The Diocese should develop a future training plan that covers the governing body and all personnel to increase their understanding of equity diversity, and cultural difference. Equity, diversity, and cultural differences should also be included in policies as they are reviewed.	
2.1.3	The organisation actively anticipates and responds effectively to the diverse circumstances of children and vulnerable adults.	Met	The Safeguarding Policy and related documents give guidance to the Diocese and staff on the approach and response to the diverse circumstances of children and vulnerable adults.	Met
2.1.4	The organisation includes and promotes women and people of diverse cultures, backgrounds, and life experiences.	Met	The approach to women and people of diverse cultures, backgrounds and life experiences is articulated in the Safeguarding policy, and is reflectred by the broad mix of staff in the Diocese.	Met

Criterion	2.2 Respect, acknowledge and welcome Children and adults from marginalised communities, i.e. Aboriginal and Torres Strait Islander, People with Disability, CALD, LGBTIQ+ backgrounds and survivors of abuse, are respected, acknowledged and welcomed.			
Rating	Met			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
2.2.1	The organisation pays particular attention to the needs of children and vulnerable adults from marginalised backgrounds and survivors of abuse.	Met	This is addressed clearly in the Parramatta Way Statement which acknowledges the lifelong trauma of abuse victims and the failures of the Church to protect children and adults at risk. It also acknowledges the diversity of many cultural groups that reside in Parramatta, creating a kaleidoscope of diversity and beliefs that are valued and respected.	Met

				The Diocese encourages Parishes to develop a range of programs and activities for marginalised communities and is currently seeking representatives of these communities for committees and advisory groups.	
2.2.2	Approaches to equity, diversity and cultural appropriateness are documented, implemented, communicated, and reviewed.	Met		This is addressed in the Parramatta Way Statement and the upcoming 'Sorry Day' features prominately on the Diocese website. Signage and posters in the Bethany Centre promote respect and this approach is reflected in internal and external communication.	Met
2.2.3	The organisation has appropriate links with relevant community groups to ensure it remains responsive and respectful.	Met		There is a dedicated Community Engagement and Education Officer with responsibility for liaison with relevant community groups. Discussions with Parish staff confirmed both their and the Diocese's commitment to community engagement.	Met

Standard 3 – Understanding rights and particpation

The organisation promotes a culture that supports children and vulnerable adults to understand their right to be heard, listened to, and believed. The organisation seeks the opinions of children and vulnerable adults and, in doing so, is mindful of their age, development, maturity, and ability to understand and communicate.

Criterion	3.1 Participating in decisions Children and vulnerable adults are taken seriously and participate in decisions affecting them.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
3.1.1	Children are able to express their views and participate in decisions that affect them.	Met	There are a number of approaches the Diocese takes to ensure children are heard and respected. There are two guiding documents – the Children and Young People's Participation in Catholic Communities, and Safeguarding in Youth Ministry (draft), which help inform approaches taken by the Diocese.	Met
3.1.2	Vulnerable adults are provided with the opportunity to express their views and participate in decisions that affect their lives.	Met	Vulnerable adults have helped develop a number of policies and procedures and inform the current Safeguarding policy. Vulnerable adults often have their voices heard through programs they attend. Specific training is available on Safeguarding Adults at Risk. *Improvement Opportunity* While vulnerable adults have some opportunity to have their voices heard when attending programs there is no systemic approach to provide them with the opportunity to express their views and participate in decisions that affect their lives.	Met

				The Diocese should review its approach to client and community engagement and participation to ensure vulnerable adults have the opportunity to express their views and participate in decisions that affect their lives. Data extrapolated from the CFEP Surveys survey report could be taken into consideration in this context.	
3.1.3	Children can access abuse prevention programs and information about their right to feel safe and what to do if they are harmed or feel unsafe.	Not Met		There is reference to abuse prevention programs although at present there are not specific preventative programs for children developed or recommended by the Diocese (there are plans to develop these in the future). Discussions with children as to their right to feel safe as well as the use of posters and brochures at Parish level helps reinforce child safety. Children safety is supported by staff training in early recognition of indicators of abuse. While there is some reference to abuse prevention programs, at this stage children cannot access abuse prevention programs, nor information about their right to feel safe and what to do if they are harmed or feel unsafe. *Decision Panel Comment* The Decision Panel noted the response of the Diocese whereby this indicator was considered to be 'Not Applicable'. The Decision Panel disagreed and believes that this indicator is indeed applicable to the Chancery, and that there are likely to be existing referral pathways for children.	Met

| | | | The Diocese should reconsider the intent of the indicator and reflect on its applicability to the Chancery.

The Diocese is to provide evidence that children can access abuse prevention programs and information about their right to feel safe and what to do if they are harmed or feel unsafe.

Subsequent to the assessment the Diocese has provided additional evidence to support the intent of this indicator.

Supporting evidence included:
• The Diocese Office for Safeguarding website
• Poster/Resource titled *"Support Services for Kids and Young People"*
• Catholic Education (Diocese of Parramatta) website (Student Safety)
• Catholic Education (Diocese of Parramatta) website (Wellbeing)

The Decision Panel agrees that this indicator has now been met. | |
| 3.1.4 | Vulnerable adults can access abuse prevention programs and information about their right to feel safe and what to do if they are harmed or feel unsafe. | Not Met | There is reference to abuse prevention programs which is supported by posters and brochures. Discussions with vulnerable adults occurs during their various group meetings at Parish level.

While there is some reference to abuse prevention programs, at this stage vulnerable adults cannot access abuse prevention programs, nor information | Met |

about their right to feel safe and what to do if they are harmed or feel unsafe.

Decision Panel Comment
The Decision Panel noted the response of the Diocese whereby this indicator was considered to be 'Not Applicable'. The Decision Panel disagreed and believes that this indicator is indeed applicable to the Chancery (e.g. vulnerable adults might include Chancery staff who are referred to Employee Assistance Programs (EAP), and that there are likely to be existing referral pathways for vulnerable adults, including the Chancery's own Prevention, Healing and Support Services.

The Diocese should reconsider the intent of the indicator and reflect on its applicability to the Chancery.

The Diocese is to provide evidence that vulnerable adults can access abuse prevention programs and information about their right to feel safe and what to do if they are harmed or feel unsafe.

Subsequent to the assessment the Diocese has provided additional evidence to support the intent of this indicator.

Supporting evidence included:
- Poster/Resource titled *"Support Services for Kids and Young People"*
- Diocese of Parramatta Office for Safeguarding website (Supports and Outreach)

			The Decision Panel agrees that this indicator has now been met.	
3.1.5	The importance of friendships is recognised and support from peers is encouraged, helping children of all ages, abilities and cultural backgrounds feel safe and included.	Met	Children and young people connect through Parish driven activities and youth groups where positive interactions are encouraged. Groups are overseen by staff with appropriate training in child and youth safety.	Met
3.1.6	The importance of friendships is recognised and support from peers is encouraged, helping vulnerable adults feel safe and included.	Met	This is referenced in the Safeguarding Policy and there are a number of support groups for vulnerable adults held at Parish level which encourages social engagement and connection.	Met

Criterion	3.2 Disability, diminshed capacity and/or cognitive impairment People with disability, diminished capacity and/or cognitive impairment are taken seriously and participate in decisions affecting them.			
Rating	Met			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
3.2.1	People with diminished capacity and/or cognitive impairment are provided with the opportunity to participate in decisions that affect them.	Met	People with diminished capacity and cognitivie impairment are included in the Safeguarding Policy definition of 'adults at risk'. Parish's run support groups for a number of vulnerable groups and feedback from these groups help inform decisions as to how these groups are supported by the Diocese.	Met
3.2.2	People with diminished capacity and/or cognitive impairment are provided with the opportunity to have family, guardians or carers support them in decisions affecting them, if they wish, or if they are unable to effectively represent themselves.	Met	Carers of people with diminished capacity and cognitive impairment are invited to participate in the care and support decisions wherever possible. Documentation sighted reinforces this expectation.	Met

Standard 4 – Participation of families, guardians, carers, support communities and the broader community

The organisation has adequate and appropriate mechanisms to communicate and engage with clients and communities, acknowledging that different levels of participation and engagement will be appropriate in different contexts and with different groups. Organisations can identify the level of participation and engagement that is appropriate, e.g., whether it is appropriate to inform, consult, involve, collaborate or empower. Organisations can demonstrate that communities, clients and stakeholders are engaged in planning, and are provided with feedback about the outcomes of their engagement.

Criterion	4.1 Informed participation Families, guardians, carers, support communities and the broader community are informed and participate in promoting the safety and wellbeing of children and vulnerable adults.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
4.1.1	The organisation consults with parents, guardians, carers, families, relevant support communities, and the broader community, and invites their feedback/participation in relation to its policies and practices for safeguarding children.	Met	Discussions with Diocese and Parish staff supported the view that the Diocese does this well. The need and importance of consulting with parents, guardians etc. is outlined in a number of documents, including the Safeguarding Policy and Management Volunteers Handbook. *Improvement Opportunity* The Diocese should use the results and associated report from the CFEP Surveys to assist in incorporating feedback into their practice.	Met
4.1.2	The organisation consults with guardians, carers, families, relevant support communities, and the broader community, and invites their feedback/participation in relation to its policies and practices for safeguarding vulnerable adults.	Met	Discussions with Diocese and Parish staff supported the view that the Diocese does this well. The need and importance of consulting with carers of vulnerable adults is outlined in many documents, including the Safeguarding Policy and Managing Volunteers Handbook. *Improvement Opportunity*	Met

				The Diocese should use the results and associated report from the CFEP Surveys to assist in incorporating feedback into their practice.	
4.1.3	The organisation engages in formal and informal discussions with families, guardians, carers, support communities and the broader community about its approach to the safety of children and vulnerable adults, in order to inform its policies and practices.	Met		Discussions with Diocese and Parish staff supported the view that this is happening, however, the identification of specific feedback that led to change could be strengthened. *Improvement Opportunity* While there is some evidence that the Diocese engages with a number of partners, it is not clear how the outcomes from such engagement is used to inform policies and practices. The Diocese should use the results and associated report from the CFEP Surveys to assist in incorporating feedback into their practice.	Met
4.1.4	Families, guardians, carers, support communities and the broader community have access to the organisation's policies and practices, and are informed about the organisation's operations and governance.	Met		Key documents are available on the Diocese website i.e. the Parrmatta Way Statement, Safeguarding Policy, Privacy Policy, WHS Policy and Complaints Policy. Communities receive regular newsletters from the Diocese providing updates on items of interest.	Met
4.1.5	Families, guardians, carers, support communities and the broader community are given an opportunity to participate in decision-making that affects their child, or the child or vulnerable adult who they care for or support.	Met		There is evidence this occurs which is supported by documentation and staff interviews. Input is sought at various levels from committees such as the Safeguarding Council and the various Parish committees.	Met

			Feedback form on the website encourages additional input and staff are encouraged to be active participants in program design.	
4.1.6	Ensure the participation of families, carers, guardians and support communities in decision-making concerning their child, or the child or vulnerable adult who they care for or support, is subject to the wishes of that child/vulnerable adult if they have the capacity to form a view and communicate their wishes.	Met	The wishes of children and vulnerable adults are sought wherever possible and help inform program design and development. This approach was reflected by members of the Parish community the assessment team met with, and staff who oversee the development of such programs.	Met

Standard 5 – Knowledge, skills, training and supervision

Human Resource (HR) management focuses on the safeguarding of children and vulnerable adults in its recruitment, management, and direction of the personnel who work in the organisation, both paid and unpaid. The organisation's HR management system needs to be comprehensive in order to deal with any issues it may encounter. All personnel are provided with an orientation to the organisation and their role within it, and personnel are appropriately qualified for their role. Effective supervision processes are in place for personnel and people feel supported by this system. Position descriptions are clearly defined to include all roles and responsibilities which are reviewed at staff performance evaluations, and processes to manage poor performance are also in place.

Criterion	**5.1 Qualifications** The organisation ensures that people working with children and vulnerable adults are appropriately qualified and screened.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
5.1.1	The recruitment process, which includes advertising, pre-employment screening and referee checks, emphasises the importance of safeguarding children and vulnerable adults.	Met	There is a comprehensive Recruitment and Selection Policy; recruitment of suitable people is outlined in the Safeguarding Policy.	Met
5.1.2	Probity checks are carried out when recruiting new personnel.	Met	There is a comprehensive Recruitment and Selection Policy and Procedure requiring that prior to appointment the following probity checks are carried out on successful applicants: • Receipt of at least two satisfactory references; • Verification of candidate's identity; • Verification of qualifications and professional status where required; • Production of evidence of the right to work in Australia where required; • Verification of medical fitness where required;	Met

| | | | • Where the position is deemed "child related", the Diocese is required to perform a verification of the successful applicant's Working with Children Check Clearance number in compliance with current Child Protection legislation and details of the verification recorded on the Diocesan WWCC Database.
• Some roles are considered exempt from this check however the Diocese may request consent to complete a National Police Check on these exempt applications.

Evidence was sighted by the assessment team. | |

Criterion	**5.2 Continuing education and training** Personnel, and organisational leaders are equipped with the knowledge, skills and awareness to keep children and vulnerable adults safe through continuing education and training.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
5.2.1	All personnel receive an appropriate induction and are aware of their responsibilities for the safety and wellbeing of children and vulnerable adults, including reporting obligations.	Met	There is evidence that staff receive training including safeguarding, privacy, abuse and reportable conduct.	Met
5.2.2	All personnel and organisational leaders receive regular training on the organisation's Code of Conduct and safeguarding and complaint handling policies, internal and external reporting obligations and how to respond to disclosures.	Met	There is evidence that staff received training including safeguarding, privacy, abuse and reportable conduct. *Improvement Opportunity* While there is evidence that staff receive training in safeguarding, privacy, abuse and reportable conduct	Met

			it is not clear if this is provided to all personnel as required in the Standard. The Diocese should reviews it staff training schedule regarding safeguarding, privacy, abuse, and reportable conduct to ensure it captures all personnel.	
5.2.3	All personnel receive regular training on the nature and indicators of abuse of children and vulnerable adults, particularly as it occurs in institutions, including recognition of disclosures, grooming, and signs of abuse.	Met	There is evidence that staff received training including safeguarding, privacy, abuse and reportable conduct. *Improvement Opportunity* While staff received training in a number of issues relating to safeguarding it was not clear to the assessment team that this includes recognition of disclosures, grooming, and signs of abuse. The Diocese should review the content of its safeguarding training to ensure it includes recognitions of disclosures, grooming, and signs of abuse.	Met
5.2.4	All personnel are supported to develop a person-centred approach and practical skills in how to respond to disclosures of abuse in accordance with the organisation's safeguarding policy and proportionate to their role/statement of duties.	Met	The Diocese has a trauma-informed person-centered approach and this is demonstratred across a variety of documentation. *Improvement Opportunity* While the Diocese has a person-centered approach in terms of assessment and care planning, and are trained in this. It is not clear that such training includes how to respond to disclosures of abuse.	Met

			The Diocese should review its person-centered approach training, and other relevant training to ensure responding to disclosures of abuse is included.	
5.2.5	All personnel, receive regular training on equity, diversity, and cultural safety.	Met	Training on equity, diversity and cultural safety is recorded on training records and all staff interviewed confirmed they had received this training.	Met
5.2.6	Organisational leaders receive regular training in good governance, including issues of accountability, transparency, inclusion, professional ethics, and how to respond to disclosures of abuse.	Met	A Governance Training Register is maintained. There is an annual performance review process in place and a 360 feedback process. Issues relating to governance is an integral part of all of these. ***Improvement Opportunity*** While there is extensive training in issues relating to overall governance it is not clear if this includes how to respond to disclosures of abuse. The Diocese should review all training, including governance training, to ensure responding to disclosures of abuse is included.	Met
5.2.7	All personnel receive regular training in relation to the range of vulnerabilities that adults may experience.	Met	'Vulnerable adults' is a component of the 'Introduction to Safeguarding Mandatory Module 3' – this safeguarding training is currently being rolled out to staff.	Met

Criterion	**5.3 Supervision and line management processes** Supervision and line management processes are promoted and encouraged throughout the organisation.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
5.3.1	The organisation has processes in place to manage poor performance.	Met	Evidence of a performance management process was sighted and all staff confirmed they received performance reviews.	Met
5.3.2	Organisational leaders and personnel who work with children and/or vulnerable adults undertake regular professional supervision with an appropriately qualified and accredited supervisor.	Met	Supervision is available to staff who work directly with children and vulnerable adults, and there is access to an external EAP. The Diocese is currently working to extend supervision to priests in the Diocese. The Pastoral Supervision for Clergy Policy was developed in 2021; this is scheduled for rollout in 2022. A register of pastoral supervisors has been collated.	Met
5.3.3	Supervision and the management of personnel has a safeguarding focus.	Met	This has commenced and it was acknowledged by the Diocese that this is currently in the implementation phase.	Met

Standard 6 – Risk management

The organisation prioritises the safety and wellbeing of children and vulnerable adults within a culture of prevention of harm, and identifies, assesses, controls and reviews risk at all levels. There are systems and processes in place to collect and analyse information to address potential and actual risks, management and leadership of risk is delegated, and those responsible are accountable. Risk domains may include (but are not limited to): governance, reputational, financial, operational, work health and safety, legislative, workforce and technology.

Criterion	6.1 Prevention, identification and mitigation of risk Risk management strategies are focused on prevention, identification and mitigation of risk to children and vulnerable adults.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
6.1.1	The organisation has a risk management framework that identifies, monitors, and mitigates actual, potential, and transient risks to children and vulnerable adults. The risk management framework is supported by a risk management plan, policies, procedures and a risk register.	Met	There is a comprehensive risk management policy and framework. This is supported by the Safeguarding Policy in the context of risk to children and vulnerable adults.	Met
6.1.2	Risks are identified, analysed, reported, and acted upon. The governing body receives regular reports, and more frequently if necessary, about the management of risks.	Met	Safeguarding is an item in the Risk Management Quarterly Report, and risk is a standing agenda item for relevant committees. ***Improvement Opportunity*** While there is evidence of risk-related data being collected it is not clear that there is collection and analysis of data relating to risk to children and vulnerable adults. The Diocese should review its data collection and analysis processes to ensure data relating to risk to children and vulnerable adults is included.	Met

6.1.3	The organisation puts risk management plans and processes in place in relation to all events involving children and/or vulnerable adults.	Met	The Safeguarding Policy is clear and concise regarding taking action and responding to complaints and concerns. The policy requires that complete and accurate records are created and maintained for all incidents, complaints (including allegations), responses and decisions that relate to abuse or harm to children or adults at risk. Records will be created at the time of, or as soon as practicable following an incident, complaint, response or decision. Records relating to any allegations will be maintained on file.	Met
6.1.4	Where relevant, the organisation has risk management strategies and processes in place to manage risk of harm to children or vulnerable adults of psychological, physical or sexual abuse posed by: a) known, alleged, or suspected abusers who have, or wish to have, a continuing involvement with the organisation b) children or vulnerable adults with harmful behaviours who participate, or wish to participate, in the organisation's services or activities	Not Met	Staff interviewed described a process whereby known abusers who wish to have a continuing involvement with the organisation are managed. While the Safeguarding Policy is a comprehensive document, it is not clear that it covers: a) known, alleged, or suspected abusers who have, or wish to have, a continuing involvement with the organisation b) children or vulnerable adults with harmful behaviours who participate, or wish to participate in the organisation's services or activities. *Decision Panel Comment* The Decision Panel acknowledges that the Safeguarding Policy does provide evidence of processes in place in relation to adults who pose a serious risk (page 22).	Met

| | | | It was noted by the Decision Panel that the Diocese has referenced a "high-risk personnel framework document" in its initial Natural Justice response. However, this document was not provided to support compliance with this indicator.

In the subsequent Natural Justice response, the Decision Panel acknowledges that the Safeguarding Policy and risk assessment template provided (named below), do provide evidence that processes are in place to manage adults and children who pose a risk to others. On that basis the Decision Panel considers this indicator to now have been met.

However, the Decision Panel considers this to be an improvement opportunity whereby the Diocese may wish to consider developing more specific documentation around how children and adults with harmful behaviours are managed beyond the risk assessment stage.

Supporting evidence included:
- Risk assessment template titled *"Allegation against Parish/Religious/Staff/Volunteer Risk Assessment Framework"*

Improvement Opportunity
The Diocese may wish to consider developing more specific documentation around how children and adults with harmful behaviours are managed beyond the risk assessment stage. | |
|---|---|---|---|---|
| 6.1.5 | Where appropriate, and consistent with applicable laws, personal and other | Met | Sharing of information is included in the Privacy Policy. | Met |

	information is proactively shared, both within and outside the organisation, in order to manage risks to the safety and wellbeing of children and vulnerable adults.			

Criterion	**6.2 Physical and online environments** Physical and online environments minimise the opportunity for abuse or other kinds of harm to occur.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
6.2.1	Risks to the safety of any person and in the organisation's physical environment, and to the safety of children and vulnerable adults in particular are identified and mitigated.	Met	A site inspection of the Chancery and discussions with staff confirmed the physical environment promotes safety.	Met
6.2.2	Risks to the safety of any person in the organisation's online environment and to the safety of children and vulnerable adults in particular, are identified and mitigated.	Met	There is a comprehensive Information and Security Policy that is adequate to cover risk to all in the organisation's online environment, however there is no direct reference to children and vulnerable adults. ***Improvement Opportunity*** While there are policies and processes in place to cover risk in the online environment it is not clear that there is a specific reference to children and vulnerable adults. The Diocese should review policies and procedures relating to safety in the online environment and, where necessary, include reference to the safety of children and vulnerable adults.	Met
6.2.3	The online environment is used in accordance with the organisation's Code of Conduct, and other relevant policies and procedures.	Met	The Diocese maintains a register showing all personnel have been made aware of the	Met

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organisation's Code of Conduct/Safeguarding policy in relation to online usage.

The Code of Conduct clearly sets out personnel obligations related to the online environment and links these with personnel and organisational obligations under other relevant policies and procedures, including policies and procedures for safeguarding, privacy, confidentiality, IT management, and records.

The Diocese engages software to detect breaches of the Code of Conduct/Safeguarding policy in relation to online usage. While where appropriate, designated personnel monitor potential breaches of the code and policy.

The Diocese conducts reviews of actual, and suspected, breaches of the Code of Conduct and relevant policies and procedures and acts on outcomes from these to address potential or ongoing risks in the online environment.

Delegation documentation and/or position descriptions, and the organisational chart ensures that responsibility and accountability for potential breaches is assigned.

The Diocese maintains training and induction records with respect to online safety for children and vulnerable adults.

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6.2.4	The organisation has a designated person who has primary responsibility for electronic and computer systems.	Met	This is the role of the Head of ICT, Records and Archive Manager.	Met
6.2.5	The organisation does not store or temporarily leave personal information of clients where unauthorised persons may have access.	Met	Proper storage of records is governed by the Records Management System Policy.	Met
6.2.6	The organisation ensures that all personnel have individual passwords that allows them access to sensitive records and information according to their level of authorisation.	Met	All laptops and other computer equipment, and databases are password protected.	Met
6.2.7	The organisation has a business continuity and information management plan.	Met	The Business Continuity Plan, called the Crisis Management Plan was sighted by the assessment team.	Met

Standard 7 – Responding to complaints or concerns

The organisation has policies and processes for responding to and managing complaints and concerns related to the safety and wellbeing of children and vulnerable adults which are based upon the principles of transparency; accessibility; responsiveness; the prioritisation of safety and wellbeing, and the prevention of harm; procedural fairness; justice; confidentiality; and continual improvement.

Criterion	**7.1 Complaint policies and processes** Policies and processes for responding to complaints and concerns related to the safety and wellbeing of children and vulnerable adults are in place and adhered to.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
7.1.1	The organisation has policies and processes for responding to complaints and concerns which are clear, concise, and easily understood by all personnel and by children, vulnerable adults, and their families, guardians, carers, and support communities.	Met	The Complaint Management Policy is supported by a number of flowcharts outlining the process required for differing i.e. situations, complaints and concerns. A number of policies support this approach and staff intrerviewed were aware of this process. The Diocese website outlines the complaints process to the community and a number of recently developed flowcharts will be distributed to the Parish's. *Improvement Opportunity* While there is evidence of ongoing work in relation to updating flowcharts and other documentation, a number of flowcharts presented to the assessment team did not show an update date or evidence of version control. The Diocese should review its documentation review processes to ensure the date of review and the current version is included.	Met

7.1.2	All children, vulnerable adults, personnel, and the general public have access to information about how to make a complaint or register a concern and the processes by which complaints and concerns will be responded to.	Met	There is a 'complaints' section on the Diocese website with resources, including the Complaint Management Process and Whistleblower Policy. These will be supplemented by flow charts that have recently been developed for distribution. Safeguarding training has a key focus on handling concerns and complaints. Parish staff are aware of the process but some staff members stated they are looking forward to receiving printed copies of the process.	Met
7.1.3	The organisation's complaint handling policy and associated policies and procedures clearly outline roles and responsibilities, and obligations to act and report, and provide guidance on how to respond to different types of complaints or concerns.	Met	Roles and responsibilities for complaint management are documented in the Complaint Management Policy and the Complaint Management Framework. Interviews with senior leadership and the staff suggest this process is well understood. There are clear policies from Catholic Church in Australia in regard to dealing with complaints about the Bishop or other senior church figures in each Diocese, and these ensure the complainant and the complaint process bypasses the person who is subject to the complaint.	Met
7.1.4	Complaints or concerns are taken seriously and responded to promptly and thoroughly.	Met	The policy stipulates that complaints should be dealt with promptly; the flowcharts include timeframes for investigation and response. The Curia were able to identify the required process to ensure all complaints are actioned appropriately under the principles of procedural fairness as were other staff spoken to.	Met
7.1.5	The organisation meets all legal and ethical obligations to make notifications or reports, to	Met	Mandatory reporting in the Diocese is the responsibility of the Bishop who delegates this	Met

	police, statutory welfare and other authorities, as they arise at any stage following receipt of a concern or complaint. This includes where reporting is not legally mandated, but is appropriate and in the best interests of children and vulnerable adults.		responsibility to the Vicar General, Moderator of the Curia and the Head of the Office of Safeguarding. There are suitable feedback loops to ensure mandatory reporting occurs and can't be overlooked, including reporting back to the individual who raised the complaint. The Complaint Management Process meets legal and ethical requirements; it operates independently from other complaint/concern processes such as the Child Protection and Whistleblower Policy.	
7.1.6	In responding to complaints or concerns, the organisation meets relevant employment and fair work obligations under applicable laws.	Met	The Diocese has a well-established HR team and accompanying policies and procedures. The HR policy acknowledges the need for HR involvement where necessary and the need for procedural fairness in complaint resolution.	Met
7.1.7	The organisation supports and actively facilitates reporting to police and other authorities by personnel in accordance with their legal and ethical obligations. Where personnel are not legally mandated to report, the organisation encourages and supports them to report if it is appropriate and in the best interests of children and vulnerable adults for personnel to do so.	Met	This is included in the Safeguarding Policy and the Complaint Management Policy and is reflected in the current Safeguarding training that is being rolled out to all staff. As outlined in 7.1.5, there are established processes for mandatory reporting.	Met
7.1.8	Strict confidentiality is maintained throughout all stages of response to a complaint or concern, subject to any legal requirements or authorisation to disclose information.	Met	Privacy and confidentiality issues are addressed in the relevant policies. In practice, all allegations of safety concerns for children and vulnerable adults are handled by the Office of Safeguarding. *Improvement Opportunity*	Met

				Given the Office of Safeguarding oversees contact with alleged or convicted perpetrators, there is a need to strengthen existing practices to separate services provided by its staff to both victims and perpetrators. The Diocese should develop a framework and associated policies that strengthen the "firewall" within the Safeguarding Office between services provided to victims and perpetrators.	
7.1.9	All stages of response are fully documented with complete, accurate and reliable records, which are securely retained for an appropriate period, in accordance with the organisation's record keeping policy. Access to records is provided only in accordance with the organisation's record-keeping/privacy policies and applicable laws, and where doing so will not compromise (potential) investigations or criminal justice processes, or the safety of any persons.		Met	Recording issues relating to complaint management is outlined in the Complaint Management Policy; access to records is governed by the Records Management System Policy. The Diocese has adopted an approach where all records are to be kept indefinitely. Such processes were supported by staff who were interviewed.	Met
7.1.10	Relevant information (including personal and sensitive information) is lawfully shared, where necessary and appropriate, for the protection and wellbeing of children and vulnerable adults, or the safety of other persons.		Met	Disclosure of information to third parties is included in the Privacy Policy and there are processes to ensure information sharing is properly documented audited Mandatory reporting process ensures that appropriate information is provided as required by NSW legislation through the Office of Safeguarding and is listed in this office register.	Met
7.1.11	The organisation's conflicts of interest policy are stringently adhered to, to ensure that		Met	While there is no specific conflict of interest policy, this is covered in the Code of Conduct.	Met

	conflicts of interest are avoided or effectively managed through all stages of response to a complaint or concern.		***Decision Panel Comment*** The Decision Panel noted the response of the Diocese that there are two confict of interest registers used in the Chancery, and also noted that conflicts of interest are briefly referenced in the Diocese Code of Conduct and Safeguarding Policy. However, the Decision Panel also noted that the two conflict of interest registers were not provided as documentary evidence in support of this indicator. ***Improvement Opportunity*** The Diocese should develop and communicate a standalone Conflict of Interest Policy, or expand on the material relating to conflicts of interest already contained in the Safeguarding Policy. ***Improvement Opportunity*** The Diocese should review policies and procedures to strengthen the "firewall" between staff in the Office of Safeguarding who deal with victims and perpetrators to ensure there is no real or perceived conflict of interest.	
7.1.12	The organisation's complaints handling policy and associated policies and procedures require and enable appropriate responses to historical abuse allegations.	Met	The organisation's complaints handling policy provides clear direction and guidance to staff and the community about the importance of the Diocese responding appropriately to all historical abuse allegations. The Diocese continues to work with both victims and perpetrators of historical abuse and is an active participant in the National Redress Scheme. The stated public commitment by the Bishop and the	Met

			decision by the Diocese to keep all records supports the view that the Diocese is willing to look into any historical allegations that are raised, both now and in the future.	
7.1.13	The organisation's complaints handling policy requires and enables appropriate responses to concerns and complaints about children or vulnerable adults engaging in harmful behaviours towards others.	Met	There is reference in the Safeguarding Policy on recognising concerns and complaints about children or vulnerable adults engaging in harmful behaviours towards others. *Improvement Opportunity* While the Diocese responds well to clear cases of harmful behaviours, it could strengthen its response when concerns are less obvious. The Diocese should consider strengthening its reponse if concerns are first raised informally.	Met

Criterion	7.2 Prevention of harm The organisation's complaint handling policy and associated policies and procedures prioritise the safety and wellbeing of children and vulnerable adults, and promote the safety and wellbeing of all, within a culture of prevention of harm.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
7.2.1	The organisation's complaint handling policy and associated policies and procedures prioritise the safety and wellbeing of any child or vulnerable adult who is/was/may be a victim or at risk, through all stages of response to a complaint or concern.	Met	The Parramatta Way Statement puts safeguarding first and stipulates the best interests of the children are paramount. This approach is supported by the Safeguarding and Complaints Management policies and the risk-based approach the Diocese adopts when investigating a complaint concerning safety and wellbeing.	Met

7.2.2	The organisation's complaint handling policy and associated policies and procedures promote the safety, wellbeing and confidentiality of anyone bringing forward a complaint or raising a concern with the organisation, or making a report to external authorities. The organisation maintains a whistle-blower policy, along with its complaint handling policy and other relevant policies, to provide protections for complainants and reporters. The organisation ensures that these policies are accessible to all.	Met	The Safeguarding Policy, Complaint Management Policy, and the Privacy Policy, promote safety, wellbeing and confidentiality. There is a stand alone Whistleblower Policy that stresses the importance of confidentiality, safety and wellbeing of those making such complaints. All are available to the public on the Diocese website.	Met
7.2.3	Upon receipt of a complaint or concern, the organisation takes immediate steps to address the risk of harm to children and vulnerable adults, as well as to the complainant or person raising the concern, the person who is the subject of the allegation (PSOA), the broader community, and any other person. The organisation continues to take steps to address the risk of harm, with ongoing reviews of risk at each stage of response.	Met	There is a strong sense in all documents of working to address all areas of risk. Each complaint receives its own Risk Assessment and where there are concerns of immediate risk these get an immediate response and are escalated. Support is offered to complainants in correspondence.	Met
7.2.4	Throughout all stages of response, where appropriate and possible, the organisation offers and provides reasonable care and support to all affected individuals.	Met	Complainant can request to remain anonymous and can be provided with a support person where necessary. The organisation's records demonstrate that it has offered and provided reasonable care and support to affected individuals, where appropriate and possible. All complainants are advised of external support services that are available to them if need be.	Met
7.2.5	Where relevant and safe to do so, families, guardians, or carers of the child or vulnerable	Met	The Complaint Management Policy requires all involved to be kept informed of the progress of the	Met

	adult are notified of the complaint and offered any appropriate and reasonable support. Parents, guardians, or carers are kept informed through all stages of response, as appropriate and reasonable and consistent with applicable laws.		matter as the investigation progresses. This policy contains specific processes for notification if a family member, carer or guardian is the person the complaint is regarding.	
7.2.6	The organisation engages and communicates with (alleged) victims and survivors through all stages of response in a manner that is trauma informed, culturally safe, and appropriate for their age and capacity.	Met	The Parramatta Way has a trauma-informed approach. The relevant flowcharts include processes for engaging and communicating with alleged victims and survivors.	Met
7.2.7	The organisation has clear criteria in relation to whether and when the PSOA is to be temporarily suspended or transferred from their normal duties while they are the subject of an investigation or legal proceedings related to the abuse of a child or vulnerable adult.	Met	There are clear processes for managing PSOA which provide clear direction and guidance for decisions regarding transfer/suspension of the PSOA. The requirement for a valid Working with Children Check (WWCC) ensure the cessation of contact with children and vulnerable adults immediately if this check is revoked.	Met

Criterion	**7.3 Legislative requirements** The investigation proceeds according to legislative requirements and according to the principles of procedural fairness, timeliness and good communication.			
Rating	**Met**			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
7.3.1	The organisation's complaint handling policy and associated policies and procedures set out requirements to ensure that the integrity and independence of investigations is maintained.	Met	The Complaint Management Policy and Framework give direction on maintaining the independence of investigations.	Met
7.3.2	The organisation's complaint handling policy and associated policies and procedures provide clear direction and guidance for the	Met	The Complaint Management Framework, Policy, and flowcharts outline the investigation and management process and include the process for review.	Met

	proper conduct of the investigations, decision-making based on investigation outcomes, and subsequent reviews/appeals.			
7.3.3	The organisation ensures that all relevant personnel understand their obligations to cooperate with and provide all reasonable assistance to internal/external investigators and law enforcement and other authorities. The organisation supports personnel to meet those obligations.	Met	Complaint management documents and the Code of Conduct state the obligations of all personnel involved. The Safeguarding training currently being rolled out to all staff includes the investigation process and the role of staff in any investigation.	Met
7.3.4	The organisation ensures that the personnel who manage investigations consult with relevant external authorities to ensure that the organisation's investigation does not prejudice any current or potential future statutory investigation or criminal prosecution.	Met	Consulation with external authorities is included in the Safeguarding Policy and in the job description of the Legal Management Consultant. Clearance from external authorities to commence and continue internal investigations and other communications with external authorities are documented and retained as records in accordance with the organisation's record-keeping policy.	Met
7.3.5	The participation of children and vulnerable adults is managed to ensure their rights are respected, and that any risk that they will be re-traumatised through investigation processes is avoided or minimised.	Met	Direction on managing the rights of children and avoiding re-traumatising is included in the Safeguarding Policy and in the Complaint Management Flowcharts. Investigators must have appropriate training in working with children an vulnerable adults.	Met
7.3.6	The organisation acts promptly and fairly on the outcomes of investigations to promote the safety and wellbeing of children and vulnerable adults.	Met	There are policies and procedures to support the timely response to investigation findings. The Bishop has and will issue a press-release with appropriate details of the crimes a perpetrator has been convicted on. If, however an alleged perpetrator is found not guilty, the Bishop is understandably reticent to	Met

			announce this publicly. Whilst wanting to acknowledge the court's ruling in such cases, the Diocese does not want to be seen "celebrating" such decisions.	
7.3.7	Affected parties have an opportunity to seek review of the conduct and outcomes of an investigation, and organisational responses to concerns or complaints about the conduct or outcomes of an investigation are timely, transparent, and fair.	Met	The Complaint Management Policy makes provision for internal review of outcomes if the complainant is not satisfied. This policy also provies details of the availability of an external review in certain circumstances.	Met

Criterion	7.4 Supporting victims and survivors The organisation supports victims and survivors.			
Rating	Met			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
7.4.1	The organisation offers a compassionate and just response to those who have been abused or harmed.	Met	The Parramatta Way Statement promotes a compassionate and just response when investigating complaints. The Diocese informs victims/survivors and their families about the availability of redress options, including direct personal response by the organisation; access to therapeutic support and services; monetary compensation through the National Redress Scheme or through a civil claim for damages.	Met
7.4.2	The organisation offers reasonable and appropriate support to victims/survivors through the course of criminal justice and redress processes.	Met	The Healing and Support services provides a trauma-informed approach case management service to people who have been harmed by the Church. Referrals to this service are received through the	Met

			Office of Safeguarding, which can come from Parish's or direct victim contact.	

Criterion	7.5 Policy review Complaint handling and safeguarding policies and practices are continuously reviewed and improved.			
Rating	Met			
Indicator	Description	Assessment Rating	Assessment Comments	Final Rating
7.5.1	The organisation regularly reviews policies and practices pertaining to complaint handling and safeguarding of children and vulnerable adults.	Met	The Diocese's Safeguarding Officer and/or Safeguarding Committee regularly reviews and updates its complaint handling policy and associated policies and proceures. Key documents contain a review date, which currently must be reviewed every three years.	Met
7.5.2	The organisation regularly analyses complaints to identify causes, systemic failures and systemic risks (patterns or trends), in order to inform and drive continuous improvement.	Met	The Diocese Vicar General and Head of Office for Safeguarding track complaint/response data to gauge trends and such information is forward to the Safeguarding Committee and Safeguarding Officer. This process ensures systemic risks (patterns or trends), systemic failures, and their causes are discussed in the right forums and appropriate action/quality improvement activities are taken.	Met
7.5.3	The organisation regularly undertakes systemic analysis of organisational responses to concerns and complaints, in order to inform and drive continuous improvement.	Met	As outlined in 7.5.4, there are a variety of mechanisms by which the Diocese systematically analyses organisational responses to concerns raised. The Curia are provided with a regular report on Safeguarding, emerging trends, responses and suggested improvements.	Met