



**Integroe**  
**PARTNERS**

# FINAL REPORT

**DIOCESE OF BATHURST**

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## NCSS Safeguarding Audit Report

**DECEMBER 2025**



*Catholic Diocese of Bathurst*

This document is the safeguarding audit report for the Catholic Diocese of Bathurst. This audit was undertaken by Integroe Partners, an accredited auditor with Australian Catholic Safeguarding Limited.

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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, the Australian Catholic Centre for Professional Standards and the Australian Catholic Ministry Register. ACSL is a company limited by guarantee, whose membership is composed of 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 children and adults at risk. 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.

The Australian Human Rights Commission released the National Principles for Child Safe Organisations (the National Principles). The National Principles are derived from the Child Safe Standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission) which relate specifically to child safety. The Office of the Children's Guardian considers that organisations in NSW that are implementing the National Principles will be simultaneously implementing the Child Safe Standards.

The NCSS give effect to the National Principles and are the way that the Catholic Church is responding to the recommendation of the Royal Commission that religious organisations adopt and implement the Child Safe Standards. The NCSS are designed to contextualise the National Principles and Child Safe Standards to the Catholic Church in Australia. For more information about the NCSS please see: [National Catholic Safeguarding Standards - Australian Catholic Safeguarding Ltd \(acsltd.org.au\)](https://www.acsltd.org.au).

This audit report includes the results of the assessment against the NCSS for the Catholic Diocese of Bathurst ('the Diocese').

### 1.2 Auditor Credentials

The audit was conducted by Integro Partners, an ACSL accredited auditor listed on the ACSL's NCSS Auditor Register. NCSS auditors must complete ACSL's Auditor Induction Program prior to carrying out safeguarding audits of Church entities against the NCSS. Prior to being engaged by an entity to conduct an NCSS audit, they must also satisfy conflicts of interest requirements.<sup>1</sup>

Integro Partners is a multidisciplinary legal practice and specialises in the provision of safeguarding and professional standards services to a variety of sectors including education, health, welfare and aged care services. The firm has a breadth of experience in developing and implementing bespoke safeguarding frameworks, policies and procedures that are developed specific to organisations and

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<sup>1</sup> ACSL, *Guidance Note on Managing Conflicts of Interest in Engaging an NCSS Auditor*, March 2023

their needs, and which are informed by relevant legislative and regulatory requirements, as well as principles of best practice.

This audit was led by Ms Michelle Scobie, Partner, who has extensive experience working with organisations to provide safeguarding services. Michelle holds post graduate qualifications in Law and Health Administration and is an experienced Resolution Institute Advanced Mediator who has been engaged in the management of complex disputes in community and government sectors for more than a decade. Michelle has been fortunate to gain firsthand experience working in partnership with and supporting ACSL on prior audits.

### 1.3 Audit Approach

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

The National Catholic Safeguarding Standards are interrelated and interdependent. They work together to ensure every entity, ministry, and organisation across the Catholic Church in Australia places the safety of children and adults at risk at the core of how they plan, think and act. The 10 Standards are grouped into four capability areas according to common safeguarding principles. These capability groupings and how they work together holistically are represented below:



The audit processes we have undertaken is intended to provide reasonable assurance that safeguarding controls have been designed appropriately and are operating effectively. Therefore, this report provides a point-in-time assessment of the safeguarding practices implemented by the Diocese and the extent to which they meet the requirements of the NCSS.

This audit was conducted by Integroe Partners. Joint auditors partner with ACSL through an engagement agreement which is compliant with ASAE 3100 (produced by the Australian Auditing and Assurance Standards Board).

ACSL audit processes integrate The International Standards for the Professional Practice of Internal Auditing (IIA Standards) which are developed by the Global IIA and followed by all IIA members in Australia. These Standards include principles and requirements for undertaking professional and internal auditing and for evaluating internal audit performance.

ACSL utilises an efficient risk assessment mechanism that permits its auditors to focus their efforts on risks that are proportionate to the purpose, size, complexity, and structure of a Church Authority. This approach to planning audits ensures optimum use of the Church Authority's limited resources, has maximum impact on the activities, ministries, and parishes, and ensures constant stakeholder engagement. It is also congruent with the IIA Standards.

ACSL assesses the risk management safeguarding practices of a Church Authority through a multilayered system keeping in mind IIA Standard 2010.A1 which states: "The internal audit (here meaning the Church Authority) activity's plan of engagements must be based on a documented risk assessment, undertaken at least annually. The input of senior management and the board must be considered in this process." ACSL can thus provide objective assurance that the Church Authority is complying with the risk management components of the National Catholic Safeguarding Standards (NCSS).

For consistency and the integrity of the audit process, Integro Partners has applied the same methodology as ACSL in the completion of this audit.

#### **1.4 Background**

The Catholic Diocese of Bathurst (the '**Diocese**'), established as a diocese in 1865 and is encompassed by the archdiocese of Sydney. The diocese is situated in the centre of the archdiocese of Sydney, and borders the Wilcannia – Forbes Diocese to the west, the Armidale Diocese to the north, the Maitland – Newcastle and Parramatta Dioceses to the east, and the Wollongong, and Canberra and Goulburn Diocese to the south. The diocese is made up of 17 parishes. Bishop Michael Joseph McKenna was ordained and installed as the eighth Bishop of Bathurst on 26 June 2009. Mass is celebrated in 762 centres across the Diocese.

The Diocese includes 33 catholic schools with over 10,000 students, and employs approximately 1,467 staff.

#### **1.5 In scope assessment**

The Diocese has been assessed by ACSL as a Church entity needing to undertake the full NCSS audit. There are 10 NCSS Standards, 48 NCSS Criteria and 104 NCSS Indicators that apply to full audit entities. For further details of the risk-based audit framework, refer to the [ACSL website](#).

Our assessment of the Diocese compliance with the NCSS indicators is detailed in Section 2 of this report. Our recommendations for improvement, including the Diocese of Bathurst's management responses, are included in Section 3 of this report.

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

The audit scope included the following dimensions:

- Review of policies and procedures: Desktop review of Diocesan safeguarding policies, procedures and documentation supplied as evidence of progress in implementing the NCSS to

assess how the policies and procedures are operationalised.

- **Fieldwork:** Leadership meeting, Interviews, Site Visits. Site visits to include:
  - Chancery visit to review documents and meet with the Diocesan leadership team.
  - Interviews with the Leadership Team, Professional Standards and Safeguarding Advisory Panel and personnel; Vicar General and Finance Team, Pastoral Council.
  - Four (4) parishes including at least 1 being administered by an overseas recruited priest, parish council representatives, safeguarding officers and parish secretaries.
  - Interviews with the following ministries:
    - CSU Catholic Chaplaincy.
    - Prison Ministry.
    - RISE Youth Ministry.
    - Clergy Care.
    - Centacare Leadership.

The Diocese was assessed against the NCSS, covering both children and adults at risk. In October 2025, Integroe Partners completed a desktop audit of the Diocese's NCSS Self-Assessment, which provided the Diocese with an opportunity to present their evidence of their congruency with the NCSS. Fieldwork was conducted from 10 November to 14 November 2025.

The following were selected for site visits:

- The Diocese Chancery Office.
- St Raphael's Parish, Cowra.
- St James' Church, Blayney.
- Parish of St Mary & St Joseph, Orange.
- St Joseph's Parish, Gilgandra.

Interviews were conducted with relevant personnel, including clergy, people in paid roles, and volunteers.

This report was completed 28 November 2025.

## **1.6 Disclaimer**

The information contained in this report is based on evidence provided by the Diocese and its representatives at the time of the assessment and, where applicable, any subsequent information the Diocese has supplied through the reporting process.

Certification issued by ACSL and/or its accredited auditors does not guarantee the safety, quality or acceptability of a participating organisations, its services or programs, or that legislative and funding requirements are being, or will be, met.

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Michelle Scobie

**Partner, Integroe Partners**

*Accredited ACSL Auditor*

## 2. OVERALL AUDIT FINDINGS

*The NCSS assessment of the Diocese indicates that the Diocese is successfully implementing and embedding a culture of safeguarding throughout its organisation.*

ACSL assessment of the implementation of NCSS indicators by a Church Authority has been determined using a four-point maturity scale.<sup>2</sup>

Our assessment indicates that the Diocese has fully implemented or has substantially progressed in the implementation of 101 (99%) of the relevant indicators to their operations. Assessment for each maturity scale is as follows:

- 101 (99%) indicators are fully or substantially progressed
- 1 (1%) of indicators are developing.

Note on scoring:

- If an indicator is assessed as **‘developed and embedded’** or **‘developed’**, it means the implementation is **fully or substantially progressed** – so the indicator will be **counted as implemented**.
- If an indicator is assessed as **‘developing’** or **‘yet to develop’**, it means the implementation is **not substantially progressed**, so the indicator will be **counted as not implemented**.

Of the 104 CSS indicators applicable to full audited Church Authorities, 2 of these are not relevant to the Diocese’s operations.

Of the NCSS indicators applicable to the Diocese’s operations, the key findings from the audit are summarised below. We note that detailed observations are included under each Indicator.

### **NCSS Standard 1 – Committed Leadership, governance and culture**

The Diocese has a zero tolerance commitment to abuse. A Safeguarding Advisory Panel has been appointed, which meets regularly to promote and monitor safeguarding within the Diocese. A strong safeguarding culture is demonstrated through a robust Safeguarding Policy, and the widely-published Safeguarding Commitment Statement. It was clear through interviews undertaken at audit that safeguarding is viewed as everyone’s responsibility and personnel had a well-developed understanding of safeguarding practices. This included the highest level of leadership, to employees and volunteers across the Diocese. Safeguarding policies are widely displayed and available on the Diocese’s website.

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

The Diocese has implemented a number of practices to ensure that children and adults are safe, informed, and participate. The Diocese is commended for their RISE Youth Ministry, which aims to engage young people with the Catholic faith. Robust measures are implemented to safeguard the RISE Youth Ministry. Easy-read and child-friendly safeguarding posters are displayed throughout all parishes. Families and parishioners are regularly invited to attend the Diocese’s Safeguarding and Safe Ministry Workshop, which is advertised in all parish bulletins.

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

The Diocese is committed to partnering with families, carers, and communities. As stated above, parishioners and families are often to engage in safeguarding activities, including training and events (e.g., Safeguarding Sunday, multicultural events in parishes). The Diocese is committed to the youth

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<sup>2</sup> Refer Appendix A for definitions of the maturity scale used for the Compliance Assessment.

community through the RISE program, and is also committed to partnering with other communities including through the prison ministries. The community is frequently invited and welcomed to provide feedback on safeguarding practices across the Diocese. Interviews undertaken at audit demonstrated a strong commitment to partnering with families, carers and communities, and we commend the Diocese for actively looking at ways to involve all.

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

The Diocese is committed to promoting equity and diversity. This is demonstrated through the Diocese's policies and procedures, which account for diverse backgrounds and circumstances. The Diocese has conducted training with personnel on diversity and equity, including training on barriers that may prevent disclosures of abuse. The Diocese has a large multicultural community, and it was evident during this audit that there is a collaborative and welcoming culture amongst the community. This is evident in the Diocese's relationship with the Vin Diocese in Vietnam (discussed in detail below), and the welcoming nature in which parishioners have embraced clergy from Vietnam and other overseas countries.

#### **NCSS Standard 5 – Robust human resources**

The Diocese is commended for their commitment to human resource management with respect to safeguarding. Robust measures are in place to monitor and track all WWCC and National Criminal History Checks. All relevant personnel hold WWCC's which are closely monitored from the St. Carlo database. Advertising, screening, and recruitment has a strong emphasis on safeguarding; the safeguarding commitment statement is included in all job advertisements. Induction programs and training programs are well-developed, including through the Diocese's Safeguarding and Safe Ministries Training, and further training modules which are delivered via Sentrion. For those who are required to undertake training modules via Sentrion, this is closely monitored through a 'Read and Acknowledged' system.

Clergy across the Diocese access regular supervision, with many clergy accessing above the required number of hours. The interviews undertaken during audit revealed a strong commitment to clergy supervision and wellbeing; supervision is widely-discussed and promoted, and clergy are provided with 'Fitness Passport' gym access to promote a culture of health and wellbeing. Clergy embed a mentality and practice of supporting one another; for example, they have cohorts/groups of clergy that are self-selected. These groups participate in regular activities such as golf and self-planned retreats aimed to support their health and wellbeing.

The Diocese has an arrangement with the Vin Diocese in Vietnam; currently the Diocese has at least 7 seminarians in formation from the Vin Diocese. There is a structured program whereby young men in discernment about a religious vocation come to Australia, become familiar with pastoral work, the Diocese and location. After their first year, if continuing with a religious vocation, they proceed to attend seminary in Sydney. During their time at seminary, they regularly return to the Diocese for pastoral engagement. Following their time at the seminary, they return to the Diocese for ordination and parish appointment. The clergy from the Vin Diocese are supported with access to regular supervision and training (e.g., they must complete safeguarding training as a priority and before engaging in any activities in the Diocese). Interviews undertaken during the audit indicated a strong commitment to clergy from the Vin Diocese; the Bishop is supportive and dedicated to ensuring that those from the Vin Diocese are supported during their formation. Those in formation are regularly monitored and supervised and all relevant background checks and visa arrangements are implemented. The Diocese is commended for their program with the Vin Diocese; it is clear that it has been a successful and enriching experience for those in formation and the Diocese more broadly. We would recommend that the Diocese develops a document outlining the program as a model to be used and explored by other Diocese.



### **NCSS Standard 6 – Effective Complaints Management**

The Diocese has implemented a robust complaints management framework; the Complaints Management Policy is supported by detailed procedure documents, including the Management of Allegations Against Employees – Children & Vulnerable Persons Procedure, Management of Historical Claims Procedure, and Reportable Conduct Scheme Procedure.

Personnel had a clear understanding of the procedures implemented within the Diocese, and understood how to deal with disclosures of abuse.

The Diocese should turn to actively looking at ways to implement pastoral care and support to victims and respondents.

### **NCSS Standard 7 – Ongoing Education and Training**

The Diocese has well developed framework of education and training. All personnel are required to undertake induction training. Ongoing training is delivered via the Safeguarding and Safe Ministries Workshop as well as modules delivered via Sentrient. Specialised training is delivered to clergy and parish staff. Leaders have undertaken the NCSS Leadership Training.

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

The Diocese is commended for its commitment to e-Safety, including through the ‘Acceptable Use of Electronic Communication Systems and Devices Policy, the distribution of e-Safety material to parishes, and ongoing training for personnel regarding safe online practices. The Diocese undertakes routine risk assessments. With respect to the physical environment, measures are in place to uphold the safety of children and adults at risk, including with respect to reconciliation practices. For particular examples, we refer to our comments at Indicator 8.1.

### **NCSS Standard 9- Continuous Improvement**

The Safeguarding Implementation Plan is commended. It is detailed and includes features such as priorities, actions, responsible persons, target complete date, and status/comments. Policies are subject to review following the recommendations from this audit, or otherwise July 2027. The Church Authority is strongly committed to and promotes the NCSS. At this stage, there are no coordinated annual local self-assessment checks in place. Throughout this audit process, the Project Manager and other personnel undertook quality assurance checks in the Parishes, and actively collaborated with the Parishes to develop and implement a safeguarding manual.

### **NCSS Standard 10 – Policies and procedures support the safety of children**

The Safeguarding Policy, Code of Conduct, Risk Management Policy and Complaint Handling Policy reference to appropriate safeguarding approaches, requirements and responsibilities. The suite of safeguarding policies are aligned, consistent, and well-developed.

## TABLE 1: SUMMARY OF NCSS ASSESSMENT

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

National Catholic Safeguarding Standard	# NCSS indicators	Not Relevant	Assessment of Implementation			
			Developed & Embedded	Developed	Developing	Yet to Develop
1. Committed leadership, governance & culture	17	1	15	1	-	-
2. Children and adults are safe, informed and participate	6	-	6	-	-	-
3. Partnering with families, carers and communities	6	-	6	-	-	-
4. Equity is promoted, and diversity is respected	4	-	3	1	-	-
5. Robust human resource management	22	-	22	-	-	-
6. Effective complaints management	19	-	15	4	-	-
7. Ongoing training & education	11	-	11	-	-	-
8. Safe physical and online environments	7	-	5	2	-	-
9. Continuous improvement	6	1	4	-	1	-
10. Policies and procedures support the safety of children and adults	6	-	6	-	-	-
<b>TOTAL</b>	<b>104</b>	<b>2</b>	<b>93</b>	<b>8</b>	<b>1</b>	<b>0</b>
	<b>102</b>		<b>99%</b>		<b>1%</b>	

### 3. SUMMARY OF RECOMMENDATIONS

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

- There are 0 Priority 1 (high rated) audit recommendations for the Diocese.
- There are 5 Priority 2 (medium rated) recommendations.
- There are 3 Priority 3 (low rated) recommendation.

Detailed recommendations can be found in Section 5 of this report.

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

Recommendation 1	The Diocese should continue to monitor the progress of its agencies, including Centacare, and their alignment with the NCSS.
Recommendation 2	The Risk Management Plan is comprehensive with respect to child safeguarding. We recommend the Diocese considers updating the Risk Management Plan to refer to adults at risk.
Recommendation 3	We recommend that an amendment is made to the Complaints Management Policy and associated procedures to ensure that it addresses barriers that may prevent a disclosure of abuse being made.
Recommendation 4	The Diocese should account for procedures relating to pastoral care (i.e., referrals to Centacare) in relevant policies, including the Complaints Management Policy and associated procedures.
Recommendation 5	The Diocese should continue to ensure that reconciliation is conducted in a safe and open environment for children. Noting slight inconsistencies across parishes in relation to adult reconciliation, we would recommend that the Diocese continues to monitor the practices in parishes and considers implementing a uniform/documented approach to reconciliation across the Diocese that aligns with best practice.
Recommendation 6	The Diocese should review the living quarters of the parish priests (as discussed above) to ensure that they are appropriately separated from the parish office/work space.
Recommendation 7	The Diocese should ensure that all third parties (e.g., music tutors) are made aware of the changes to third party agreements, including the expectations and requirements with respect to safeguarding.
Recommendation 8	Consistent with the implementation plan, we would recommend that the Diocese formalises a coordinated annual self-assessment check to ensure continued compliance with the NCSS.

<sup>3</sup> Refer Appendix B for definitions of the Priority ratings used for audit recommendations.

## 4. ASSESSMENT OF COMPLIANCE WITH NCSS INDICATORS

Standard 1		Committed leadership, governance and culture			
The safeguarding of children and adults is embedded in the entity's leadership, governance and culture					
Criterion 1.1 – There is a public commitment to safeguarding that takes a zero tolerance approach to abuse.		Developed & Embedded	Developed	Developing	Yet to Develop
1.1.1	The Safeguarding Policy is approved and endorsed by the Church Authority and/or relevant leadership body and is publicly available.	✓			
1.1.2	The Safeguarding Commitment Statement is published, widely displayed, and made publicly available.	✓			
<b>Observations:</b> <ul style="list-style-type: none"><li>Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>The Safeguarding Policy has been approved and endorsed by the Bishop and relevant leadership. It is publicly accessible via the Diocese's website and has been distributed to all relevant personnel.</li><li>The Safeguarding Commitment Statement has been published on the Diocese's website. The Statement has been added to all Diocesan Position Descriptions and job advertisements and is publicly displayed.</li></ul>					
Criterion 1.2 - A culture of safeguarding children and adults is championed and modelled at all levels of the Church Authority from the top down and bottom up.		Developed & Embedded	Developed	Developing	Yet to Develop
1.2.1	A strong safeguarding culture is created and maintained by the Church Authority and leaders by: <ul style="list-style-type: none"><li>promoting safeguarding, and the dignity and rights of everyone.</li><li>emphasising that safeguarding children and adults is everyone's responsibility; and</li><li>actively monitoring safeguarding compliance and risk management.</li></ul>	✓			
1.2.2	A Safeguarding Committee is appointed at the highest level of leadership to oversee the effective ongoing implementation of safeguarding practices, policies, and procedures.	✓			
1.2.3	A Safeguarding Co-ordinator(s) is appointed with clearly defined roles and responsibilities.	✓			
1.2.4	Personnel understand that good safeguarding practices are everyone's responsibility and are empowered to contribute to the organisation's safeguarding practices.	✓			
<b>Observations:</b> <ul style="list-style-type: none"><li>Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>Based on the documentation provided to this audit, and the interviews conducted with Church Leadership, Chancery, and parishes, there is a clear and strong culture of safeguarding. Leadership demonstrated a clear commitment to safeguarding initiatives, and ensuring and upholding the dignity and rights of all individuals.</li><li>A Safeguarding Advisory Panel (the Safeguarding Committee) has been appointed and meets to discuss the ongoing implementation of safeguarding practices, policies, and procedures. During fieldwork undertaken in the Diocese, the auditor was invited to attend a Safeguarding Advisory Panel meeting. The attendance at this meeting and a review of Panel minutes indicates a strong commitment to safeguarding practices within the Diocese.</li><li>Personnel at every level – including leadership, employees, and clergy – demonstrated a clear understanding of safeguarding best practices and an understanding of the Diocese's policies and procedures with respect to safeguarding.</li><li>A Safeguarding Coordinator has been appointed. The Safeguarding Coordinator is an employee of the Catholic Education Diocese of Bathurst, and is bringing their expertise in safeguarding to the Diocese as Safeguarding Coordinator.</li></ul>					

Criterion 1.3 - Governance arrangements facilitate the implementation of the Safeguarding Policy across the entity's activities.		Developed & Embedded	Developed	Developing	Yet to Develop
1.3.1	Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for the safeguarding of children and adults is clear.	✓			
1.3.2	Where the Church Authority's governance includes countries other than Australia, the NCSS are applied wherever possible, considering cultural differences and local jurisdictional issues.	N/A			

**Observations:**

- Requirements of the indicators are in place. No recommendations for improvement noted.
- Government arrangements are outlined on the Diocese's website and policies/procedures.
- With respect to Indicator 1.3.1, we note that Centacare leadership was subject to this audit (however, Centacare services were not). We understand that Centacare is compliant with the Child Safe Standards. They are currently in the process of ensuring alignment with the NCSS. Centacare has commenced by implementing the Diocesan Code of Conduct and in the process of mapping their current policies with the requirements of the NCSS.
- **Recommendation 1: The Diocese should continue to monitor the progress of its agencies, including Centacare, and their alignment with the NCSS.**

Criterion 1.4 – The entity's Code of Conduct sets clear behavioural standards towards children and adults.		Developed & Embedded	Developed	Developing	Yet to Develop
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, families, and carers.	✓			
1.4.3	The Code of Conduct considers the needs of all children and adults at risk, paying particular attention to: <ul style="list-style-type: none"> <li>• First Nations people.</li> <li>• individuals who are elderly, are living with disability, are suffering from an illness, or who are at risk of abuse';</li> <li>• individuals from culturally and linguistically diverse backgrounds.</li> <li>• children in out of home care, or are homeless; and,</li> <li>• children and adults of diverse sexuality.</li> </ul>	✓			
1.4.4	The Code of Conduct outlines the importance of considering how power imbalances can occur in ministries and services.	✓			

**Observations:**

- Requirements of the indicators are in place. No recommendations for improvement noted.
- The Code of Conduct is explicit and inclusive of all personnel. It provides clear guidance on expected behaviour. It is written in clear, plain English language and is accessible via the Diocese's website. It has been distributed to all relevant personnel via Sentrient, which requires personnel to 'Read and Acknowledge' each policy.
- With respect to Criterion 1.4.3, the Code of Conduct refers to and incorporates the terms of the Safeguarding Policy. The Safeguarding Policy refer to the needs of all children and adults at risk, including those with further vulnerabilities (i.e., as

outlined at Criterion 1.4.3.).					
Criterion 1.5 - The entity's risk management plan focuses on preventing, identifying, and mitigating safeguarding risks to children and adults.		Developed & Embedded	Developed	Developing	Yet to Develop
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.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>The Risk Management Plan is detailed and comprehensive. It has incorporated procedures to assess, evaluate, review, and oversee safeguarding practices, especially with respect to ministry and/or service. The Risk Management Plan is consistent with the Risk Management Policy.</li> <li><b>Recommendation 2: The Risk Management Plan is comprehensive with respect to child safeguarding. We recommend the Diocese considers updating the Risk Management Plan to refer to adults at risk.</b></li> </ul>					
Criterion 1.6 - Personnel understand their obligations on information sharing and record keeping for safeguarding and professional standards.		Developed & Embedded	Developed	Developing	Yet to Develop
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.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>The Record Keeping Policy is consistent with the Privacy Act and the findings from the Royal Commission with respect to recordkeeping. The Record Keeping Policy clearly outlines expectations, requirements, and procedures with respect to information sharing and recordkeeping practices.</li> </ul>					

Standard 2		Children and adults are safe, informed and participate			
Children and adults are informed about their rights, participate in decisions affecting them and are taken seriously					
Criterion 2.1 – Children and adults at risk engaged in an entity's ministry and/or services are informed about their rights, including safety, decision making, participation and how a complaint will be managed.		Developed & Embedded	Developed	Developing	Yet to Develop
2.1.1	Age-appropriate strategies are used to engaged children, seek their views about what makes them feel safe, and enable them to participate in decisions that affect them.	✓			
2.1.2	Adults at risk (or carers where appropriate) are engaged to provide their views about decisions which affect them, what makes them feel safe and to contribute to safeguarding approaches.	✓			

2.1.3	The organisation makes children and adults at risk aware of their rights, including their right to be safe from abuse, and who to contact if they are concerned about their safety or the safety of others.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>The RISE program provides training to youth participating in the program. This includes a training session with interactive activities and a RISE Program Youth Handbook. The RISE program has implemented a comprehensive and detailed policy and program, that is designed to safeguard youth participating in the program. The findings from interviews conducted at audit are consistent with the documentation provided to this audit process: the interviews revealed that those overseeing the RISE program have a strong understanding, commitment, and focus on safeguarding practices.</li> <li>The Diocese has designed a Safeguarding Poster in Child Friendly Language or Simple English which is displayed in parishes.</li> <li>Parishioners and families are invited to attend the Safeguarding and Safe Ministries Workshops through parish bulletins. The Diocese's website and complaints management policies and procedures allow for individual to come forward with any complaints regarding safeguarding.</li> <li>The Diocese put invitations in all parish bulletins to provide feedback and input on the Diocese's updated safeguarding policies.</li> </ul>					
Criterion 2.2 - The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and less isolated.		Developed & Embedded	Developed	Developing	Yet to Develop
2.2.1	Children are provided with age-appropriate information about safe and respectful peer relationships.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicator are in place. No recommendations for improvement noted.</li> <li>The RISE program and the RISE Youth Program handbook provides detailed information for youth in managing relationships with others. Training is undertaken by Youth Ministers (who are usually employed with the Catholic Education Diocese) to engage and support young people practising their faith.</li> <li>The Diocese has designed a Safeguarding Poster in Child Friendly Language or Simple English which is displayed in parishes.</li> </ul>					
Criterion 2.3 - The importance of friendships and social connections for adults at risk is recognised and encouraged, helping them feel safe and less isolated.		Developed & Embedded	Developed	Developing	Yet to Develop
2.3.1	Adults at risk (or their carers where appropriate), are provided with information about safe and respectful relationships.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicator are in place. No recommendations for improvement noted.</li> <li>The RISE program and the RISE Youth Program handbook provides detailed information for youth in managing relationships with others.</li> <li>The Diocese has designed a Safeguarding Poster in Child Friendly Language or Simple English which is displayed in parishes.</li> <li>Parishioners and families are invited to attend the Safeguarding and Safe Ministries Workshops through parish bulletins.</li> <li>The Diocese provided an example where a vulnerable person was identified through Catholic Education and then connected to the parish for support, and eventually joined the Youth Ministry groups.</li> </ul>					
Criterion 2.4 – Where relevant to the setting or context, children and families are offered access to abuse prevention programs and related information that is age appropriate.		Developed & Embedded	Developed	Developing	Yet to Develop
2.4.1	Children and families are provided with information, access and/or referral to abuse prevention programs, appropriate to the child's age, development, ability, and level of understanding.	✓			

**Observations:**

- Requirements of the indicator are in place. No recommendations for improvement noted.
- The RISE Youth Program provides detailed information to Youth Ministry on supporting children in understanding their rights and to ensure that safeguarding is upheld. Information has been provided to parishes around e-Safety for children and vulnerable adults.
- Parishioners and families are invited to attend the Safeguarding and Safe Ministries Workshops through parish bulletins.
- The Diocese has designed a Safeguarding Poster in Child Friendly Language or Simple English which is displayed in parishes.

Standard 3		Partnering with families, carers and communities			
Families, carers and communities are informed and involved in promoting the safeguarding of children and adults.					
Criterion 3.1 – Parents, carers and/or guardians participate in decisions affecting their child, or adults with diminished capacity.		Developed & Embedded	Developed	Developing	Yet to Develop
3.1.1	Parents, carers and/or guardians are encouraged to take an active role in monitoring the safety of those engaged in the ministry and/or service.	✓			
Observations					
<ul style="list-style-type: none"><li>• Requirements of the indicator are in place. No recommendations for improvement noted.</li><li>• Parishioners and families are invited to attend the Safeguarding and Safe Ministries Workshops through parish bulletins.</li><li>• The Diocese put invitations in all parish bulletins to provide feedback and input on the Diocese’s updated safeguarding policies.</li></ul>					
Criterion 3.2 – Families, carers and communities are engaged with and are provided information about the Church Authority’s approach to safeguarding.		Developed & Embedded	Developed	Developing	Yet to Develop
3.2.1	Families, carers and communities are encouraged to contribute to discussions about safeguarding approaches.	✓			
3.2.2	Safeguarding information widely available, including contact details of the Safeguarding Committee and/or Safeguarding Co-ordinators.	✓			
Observations:					
<ul style="list-style-type: none"><li>• Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>• Parishioners and families are invited to attend the Safeguarding and Safe Ministries Workshops through parish bulletins.</li><li>• The Diocese put invitations in all parish bulletins to provide feedback and input on the Diocese’s updated safeguarding policies.</li><li>• Safeguarding information is widely available, including in parish bulletins and the Diocese’s website. Safeguarding posters are all displayed in the parishes.</li></ul>					
Criterion 3.3 - Families, carers and communities are informed about the Church Authority’s operations and governance; and have an opportunity to have a say in the safeguarding policies and practices.		Developed & Embedded	Developed	Developing	Yet to Develop
3.3.1	Processes are in place to engage families, carers and communities about their views on safeguarding policies and practices.	✓			
3.3.2	Families, carers and communities are aware of the roles and responsibilities of personnel providing ministries and/or services directly to children and adults at risk.	✓			
Observations:					
<ul style="list-style-type: none"><li>• Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>• Parishioners and families are invited to attend the Safeguarding and Safe Ministries Workshops through parish bulletins.</li></ul>					



<ul style="list-style-type: none"> <li>The Diocese put invitations in all parish bulletins to provide feedback and input on the Diocese's updated safeguarding policies.</li> <li>Safeguarding information is widely available, including in parish bulletins and the Diocese's website. Safeguarding posters are all displayed in the parishes.</li> <li>Communication with families and carers has remained consistent with ongoing articles in the Catholic Observer and parish newsletters regarding safeguarding. Additional information is provided in parish bulletins.</li> </ul>					
Criterion 3.4 – The entity raises community awareness of the dignity and rights of all children and adults		Developed & Embedded	Developed	Developing	Yet to Develop
3.4.1	The entity promotes and/or participates in activities which raise awareness of abuse prevention and the rights and dignity of children and adults at risk.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>We refer to the evidence discussed in Indicators 3.1-3.3 inclusive.</li> <li>The Diocese has implemented programs, such as the RISE Youth Program, to raise awareness for youth. It also conducts training with relevant personnel to promote awareness of abuse prevention and the rights and dignity of children and adults at risk.</li> <li>The Diocese is involved in 'Safeguarding Sunday' as part of their ongoing commitment to ensuring the safety of children and vulnerable people in the community.</li> </ul>					

Standard 4		Equity is promoted and diversity is respected			
Equity is upheld and diverse needs respected in policy and practice					
Criterion 4.1 - The diverse circumstances and backgrounds of children and adults at risk are acknowledged and accommodated by providing appropriate support.		Developed & Embedded	Developed	Developing	Yet to Develop
4.1.1	The Safeguarding Policy and procedures demonstrate an understanding, and awareness of the diverse circumstances and experiences that increase the risk of abuse.	✓			
4.1.2	The Complaints Handling Policy and practices address barriers that may prevent a disclosure of abuse being made and that hinders personnel from recognising and responding appropriately.		✓		
<b>Observations:</b> <ul style="list-style-type: none"><li>• The Safeguarding Policy demonstrates an understanding and awareness of diverse circumstances an experiences that increase the risk of abuse. This includes reference to First Nations, refugees, diverse gender/sexuality, speaking English as a second language, and surviving sexual abuse or child abuse.</li><li>• The Diocese as conducted training with relevant personnel on barriers that may prevent a disclosure of abuse being made and that hinders personnel from recognising and responding appropriately. However, this is not codified in the Complaints Management Policy.</li><li>• <b>Recommendation 3: We recommend that an amendment is made to the Complaints Management Policy and associated procedures to ensure that it addresses barriers that may prevent a disclosure of abuse being made.</b></li></ul>					
Criterion 4.2 – Children and adults have access to information, support and complaints processes in ways that promote inclusion, are culturally safe, and accessible.		Developed & Embedded	Developed	Developing	Yet to Develop
4.2.1	Information about company processes and supports are provided in culturally safe, accessible, and easy to	✓			

	understand formats.				
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>Information about the Diocese's processes and supports are provided in culturally safe, accessible, and easy to understand formats. This includes, for example, through the Child Friendly Safeguarding Poster, and the Management of Allegations Against Employees and Historical Claims procedures. This material is also available on the Diocese's website.</li> <li>The information about Diocese processes is also provided through the parish bulletins and internal training, and is delivered in a culturally safe, accessible and easy to understand format.</li> </ul>					
Criterion 4.3 - The diverse needs of Aboriginal and Torres Strait Islander people, those living with disability, those from culturally and linguistically diverse backgrounds, children and adults who are unable to live at home, and those of diverse sexuality, are acknowledged.		Developed & Embedded	Developed	Developing	Yet to Develop
4.3.1	The Safeguarding Policy and procedures empower children and adults by reflecting attitudes and behaviours that respect their inherent dignity, are inclusive and are responsive to diverse needs.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>The Safeguarding Policy meets the requirements of 4.3.1. It outlines behaviours that are in breach of the Safeguarding Policy/Code of Conduct and what types of behaviour are acceptable. Under Section 5.17, it states that the Diocese recognises and actively anticipates the diverse circumstance of children, young people, vulnerable persons and families.</li> </ul>					

Standard 5		Robust human resource management			
People working with children and adults at risk are suitable and supported to reflect safeguarding values in practice					
Criterion 5.1 – A strong commitment to safeguarding underpins an entity's recruitment.		Developed & Embedded	Developed	Developing	Yet to Develop
5.1.1	The commitment to safeguarding and a zero-tolerance approach to abuse are explicit in advertising, screening, and recruitment for personnel.	✓			
5.1.2	Recruitment and screening procedures and processes are fully documented.	✓			
5.1.3	Positions are assessed for the expected level of contact with children/adults at risk and appropriate safeguarding recruitment procedures are implemented.	✓			
<b>Observations:</b> <ul style="list-style-type: none"><li>• Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>• There is a commitment to safeguarding and a zero-tolerance approach to abuse explicit in advertising, screening and recruitment for personnel. For example, the safeguarding commitment statement has been included in all future position descriptions and job advertisements.</li><li>• Recruitment and screening procedures and processes are fully document and are consistent with the Diocese's Recordkeeping Policy and Safeguarding Policy.</li><li>• The Diocese has provided clear evidence of positions being assessed for the expected level of contact with children/adults at risk and appropriate safeguarding recruitment procedures are implemented. For example, the Diocese provided internal correspondence regarding a new role for the Extraordinary Ministers of Holy Communion to Parishioners in their Home and Aged Care. It was assessed that a National Police Check was required and that the individual would have to sign the Code of Conduct and participate in update training.</li></ul>					

Criterion 5.2 – Personnel have current clearances (for example, working with children checks) and/or equivalent background checks relevant to their role.		Developed & Embedded	Developed	Developing	Yet to Develop
5.2.1	All personnel are required to have a background check or clearance (as relevant to their role).	✓			
5.2.2	As required by legislation, personnel must have a current working with children check (or working with vulnerable people check) and/or NDIS Worker Screening Check prior to working with children and adults at risk.	✓			
5.2.3	Records of all checks are maintained and monitored in accordance with legislation, for all personnel	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>All personnel are required to have background checks (WWCC, National Criminal History Checks) where relevant. Background checks re managed through a purpose built database system (St Carlo) which was demonstrated at audit. It was clear to the auditor that St Carlo/background checks are managed efficiently and are prioritised by the Diocese.</li> <li>Example: It was recently identified during a Safeguarding Advisory Panel meeting that those working in the ALPHA program require National Criminal History Checks, not WWCC as they are not working with children. This has been implemented in the Diocese.</li> </ul>					
Criterion 5.3 - Personnel complete appropriate induction and are aware of their safeguarding responsibilities including reporting obligations.		Developed & Embedded	Developed	Developing	Yet to Develop to
5.3.1	All personnel participate in a safeguarding induction program, which occurs as soon as possible after commencement.	✓			
5.3.2	All Church leaders and their leadership team undertake the NCSS Leadership program	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>All personnel participate in safeguarding induction training/programs, and are required to complete the Safeguarding and Safe Ministry Workshop and Sentrient Chid Protection online training which is delivered via modules. Records of who has completed the training is recorded via Sentrient. Those taking part in the RISE Youth Program undertake additional training for youth ministry. This training was demonstrated at audit and is compliant with the NCSS indicators.</li> <li>The Bishop, Diocesan Financial Administrator and Safeguarding Officer has completed their NCSS Leadership program. All members of the Safeguarding Advisory Panel have completed the ACSL training for Boards and Trustees. The Project Manager has attended other ACSL workshops to support their work in this audit.</li> </ul>					
Criterion 5.4 - Ongoing supervision and people management includes an emphasis on safeguarding responsibilities.		Developed & Embedded	Developed	Developing	Yet to Develop
5.4.1	Professional supervision, mentoring, and annual performance reviews are in place for personnel , and include a focus on safeguarding responsibilities.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>Evidence provided during the fieldwork aspect of this audit revealed a heavily embedded practice of professional supervision and mentoring. Interviews undertaken with clergy indicated that all clergy participate in regular supervision; many priests are engaging in supervision above the required amount. Documentation (supervision certificates) confirm this.</li> </ul>					

Criterion 5.5 – Before and during seminary and religious formation, candidates are appropriately screened and supported, including processes for ongoing formation, support and supervision of clergy and religious.		Developed & Embedded	Developed	Developing	Yet to Develop
5.5.1	The Church Authority seeks professional support in screening candidates for seminary/formation programs and before ordination/profession of vows.	✓			
5.5.2	Seminary and initial formation programs have robust screening processes for candidates for religious ministry, including external psychological and psychosexual assessments.	✓			
5.5.3	Ongoing integrated formation for clergy and religious addresses both the canonical and civil safeguarding requirements. For priests, this would include supporting their fidelity to the Church's teaching regarding the Sacrament of Reconciliation and the inviolability of the Sacramental Seal.	✓			
5.5.4	All clergy and religious in full-time ministry participate in at least 6 hours, with the optimum being 10 hours of professional/pastoral supervision each year.  Clergy and religious not in full-time ministry participate in 6 hours of reflective practice activities each year.	✓			
5.5.5	All clergy and religious in ministry, undertake ongoing professional development and regular appraisals	✓			
5.5.6	Newly ordained clergy and newly professed religious are supported with a suitable mentor for at least five years post ordination or final profession.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>Clergy access regular supervision, with many clergy accessing above the required number of hours.</li> <li>The interviews undertaken during audit revealed a strong commitment to clergy supervision and wellbeing; supervision is widely-discussed and promoted, and clergy are provided with fitness passports to promote a culture of health and wellbeing. Clergy embed a mentality and practice of supporting one another; for example, they have cohorts/groups of clergy that are self-selected. These groups participate in activities such as golf.</li> <li>Clergy and seminarians undergo robust screening processes, and participate in the required amount of professional/pastoral supervision.</li> <li>Clergy and seminarians are required to undertake relevant training, including the Safeguarding and Safe Ministry Workshop, and additional training at clergy conferences.</li> <li>The Diocese is commended for its commitment to supervision practices and its focus on clergy wellbeing and training.</li> </ul>					
Criterion 5.6 - The curriculum for seminary and formation programs for clergy and religious includes safeguarding knowledge and skills development of candidates to understand and lead initiatives for safeguarding children and adults.		Developed & Embedded	Developed	Developing	Yet to Develop
5.6.1	Seminary and initial formation programs build candidates' knowledge and skills in a range of areas to support safeguarding children and adults.	✓			
5.6.2	Seminary and initial formation programs include developing pastoral responses to victims and survivors of abuse.	✓			

5.6.3	Seminary and initial formation programs identify how to avoid abuse of power and the development and/or reinforcement of clericalist attitudes and behaviours.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>Clergy and seminarians are required to undertake relevant training, including the Safeguarding and Safe Ministry Workshop, and additional training at clergy conferences. This includes seminarians.</li> <li>The Diocese has an arrangement with the Vin Diocese in Vietnam; currently the Diocese has at least 7 seminarians in formation from the Vin Diocese. There is a structured whereby young men in discernment about a religious vocation come to Australia, become familiar with the pastoral work, the Diocese and location, and then after their first year, if continuing with a religious vocation, they proceed to attend seminary in Sydney.</li> <li>During their time at seminary, they regularly return to the Diocese for pastoral engagement. Following their time at the seminary, they return to the Diocese for ordination and parish placement.</li> <li>The clergy from the Vin Diocese are supported with access to regular supervision and training (e.g., they must complete safeguarding training as a priority and before conducting any activities in the Diocese). Interviews undertaken during the audit indicated a strong commitment to clergy from the Vin Diocese; the Bishop is supportive and dedicated to ensuring that those from the Vin Diocese are supported during their formation. Those in formation are regularly monitored and supervised and all relevant background checks and visa arrangements are implemented.</li> <li>The Diocese is commended for their program with the Vin Diocese; it is clear that it has been a successful and enriching experience for those in formation and the Diocese more broadly. We would recommend that the Diocese develops a document outlining the program as a model to be used and explored by other Diocese's.</li> </ul>					
Criterion 5.7 – The movement and credentialling of those in active ministry is appropriately managed.		Developed & Embedded	Developed	Developing	Yet to Develop
5.7.1	A system is in place to assess the safeguarding credentials of all seminarians, clergy, religious and lay ministries and their movement between different seminaries, formation programs and other Church entities is in place.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>We refer to our observations above with respect to Indicator 5.6.</li> <li>Information gathered during interviews indicate that the safeguarding credentials of all seminarians, clergy religious and lay ministries is prioritised and monitored carefully.</li> </ul>					
Criterion 5.8 – Where clergy and religious from countries other than Australia are recruited to ministry, programs are in place to support their cultural awareness, screening, induction, professional supervision and development.		Developed & Embedded	Developed	Developing	Yet to Develop
5.8.1	Clergy and religious from countries other than Australia recruited to ministry, are screened and verification information is sought from the international Church Authority.	✓			
5.8.2	Clergy and religious from countries other than Australia participate in a safeguarding induction program which is documented and occurs as soon as possible after commencement of ministry.	✓			
5.8.3	Clergy and religious from countries other than Australia are supported with a suitable mentor for at least the first two years of their time in Australia.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> </ul>					

- We refer to our comments at Indicator 5.6.

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.		Developed & Embedded	Developed	Developing	Yet to Develop
6.1.1	Policies and procedures address mandatory reporting obligations.	✓			
6.1.2	There are clear procedures that provide step-by-step responses and action to be taken for different types of complaints, including: <ul style="list-style-type: none"><li>• breaches of Code of Conduct.</li><li>• disclosures, allegations, or concerns of current abuse of a child.</li><li>• an adult bringing forward a complaint of abuse suffered as a child; and</li><li>• an adult bringing forward a complaint of current or past abuse experienced as an adult.</li></ul>	✓			
6.1.3	The Complaint Handling Policy outlines how perceived or actual conflict of interests are managed.	✓			
6.1.4	The Complaint Handling Policy acknowledges that power imbalances 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 referral are recorded, and confidential information is stored, protected and retained according to the Privacy Act, and for 50 years.	✓			
<b>Observations:</b> <ul style="list-style-type: none"><li>• Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>• The Diocese has detailed and comprehensive policies/procedures dealing with mandatory reporting, breaches of the Code of Conduct, disclosures, and complaints. The suite of policies and procedures are consistent with and refer to one another. These policies/procedures include:<ul style="list-style-type: none"><li>○ The Safeguarding Policy;</li><li>○ The Code of Conduct;</li><li>○ Managing Complaints and Concerns Policy;</li><li>○ Managing Conduct and Performance Policy;</li><li>○ Record Keeping Policy;</li><li>○ Whistle-blower Protection Policy;</li><li>○ Management of Allegations Against Employees – Children &amp; Vulnerable Persons;</li><li>○ Management of Historical Claims Procedure;</li><li>○ Reportable Conduct Scheme Procedure.</li></ul></li><li>• The complaint managing policies/procedures cover conflicts of interest, power imbalances, and responsibilities of relevant personnel.</li></ul>					

<ul style="list-style-type: none"> <li>Complaints, incidents, allegations, disclosures, concerns are kept in accordance with the Privacy Act. This has been codified in the Record Keeping Policy.</li> <li>Interviews undertaken during the fieldwork aspect of this audit revealed a strong commitment by personnel to managing disclosures carefully. The Diocese is commended for the development of their Safeguarding Manual which has been provided to all parishes. The manual provides guidance on safeguarding procedures, including when someone makes a disclosure. The interviews conducted with clergy and parish personnel indicate that there is an embedded understanding of how to manage disclosures.</li> </ul>					
Criterion 6.2 - The Complaint Handling Policy is understood by children, adults, families, carers, and personnel, and focuses on the rights of children and adults at risk.		Developed & Embedded	Developed	Developing	Yet to Develop
6.2.1	The Complaint Handling Policy and procedures demonstrate how the safety and well-being of children and adults at risk are prioritised.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>The Complaints Management Policy and associated procedures (e.g., Management of Allegations Against Employees – Children &amp; Vulnerable Persons and Management of Historical Claims Procedure) detail procedures and responsibilities to prioritise the safety and well-being of children and adults at risk. This includes conducting risk assessments in line with the Risk Management Policy.</li> <li>Interviews undertaken during the fieldwork aspect of this audit revealed a strong commitment by personnel to managing disclosures carefully. The Diocese is commended for the development of their Safeguarding Manual which has been provided to all parishes. The manual provides guidance on safeguarding procedures, including when someone makes a disclosure. The interviews conducted with clergy and parish personnel indicate that there is an embedded understanding of how to manage disclosures.</li> </ul>					
Criterion 6.3 - Complaints are taken seriously and responded to promptly and thoroughly.		Developed & Embedded	Developed	Developing	Yet to Develop
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 or adults. Ongoing risk assessments are conducted throughout investigation processes.	✓			
6.3.3	Complainants are responded to promptly and kept informed as to the progress of dealing with their complaint.	✓			
6.3.4	Trauma-informed and victim-centred support and care is offered to any child or adult who has experienced abuse.		✓		
6.3.5	Sharing information relating to complaints adheres to the Australian Privacy Principles and relevant legislation.	✓			
6.3.6	The Complaints Handling Policy and procedures 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 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.	✓			
6.3.8	Where a clergy or religious is convicted of a canonical offence relating to child sexual abuse, the respondent is to be prohibited from the exercise of ministry until such times as the process for imposing a penalty is completed by the relevant dicastery.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>All policies, including the Complaints Handling Policy, are aligned and consistent.</li> <li>The Complaints Handling Policy and associated procedures outline in detail the requirement to undertake risk assessments when complaints are received. This is consistent with the Risk Management Policy.</li> <li>The Diocese of Bathurst has not received many complaints that can demonstrate this in practice; however, it is embedded in the policies and procedures.</li> <li>Information sharing is consistent with the privacy principles and legislation; we refer to the contents of the Recordkeeping policy in this regard.</li> <li>The Diocese undertakes a risk management process where there is a complaint of sexual abuse of a child or adult against a clergy; this includes in the civil and canonical jurisdictions. The Complaints Handling Policy and associated procedures outline where clergy or employees are prohibited from exercising their role when a complaint has been made.</li> </ul>					
Criterion 6.4 - The Complaints Handling Policy includes the process of reporting complaints and concerns to relevant authorities, requiring cooperation with any statutory or contractual processes.		Developed & Embedded	Developed	Developing	Yet to Develop
6.4.1	The Complaints Handling Policy requires that: <ul style="list-style-type: none"> <li>concerns and complaints of child abuse occurring within the entity be reported to the appropriate statutory authorities, in accordance with regulations.</li> <li>any concerns and/or complaints of a criminal against adults be reported to statutory authorities; and</li> <li>personnel cooperate with law enforcement procedures and directives.</li> </ul>	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>The Complaints Handling Policy and associated procedures outlining the reporting requirements, including to NSW Police, DCJ, and the OCG. These practices are outlined in detailed in the Reportable Conduct Procedure.</li> </ul>					
Criterion 6.5 – The Church Authority ensures mechanisms are in place to support complainants of child and adult sexual abuse.		Developed & Embedded	Developed	Developing	Yet to Develop
6.5.1	Appropriate pastoral care is provided to complainants.		✓		
<b>Observations:</b> <ul style="list-style-type: none"> <li>With respect to pastoral care for complainants, it is the practice of the Diocese to refer individuals to Centacare for any support that is required. In the case of any redress claims, the DPR links go directly to Centacare.</li> </ul>					



Criterion 6.6 - The Church Authority ensures respondents facing allegations are supported and monitored.		Developed & Embedded	Developed	Developing	Yet to Develop
6.6.1	Appropriately trained personnel engaged in consultation with the respondents 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.		✓		
<b>Observations:</b> <ul style="list-style-type: none"> <li>With respect to pastoral care for complainants, it is the practice of the Diocese to refer individuals to Centacare for any support that is required. Support is overseen by Centacare.</li> <li><b>Recommendation 4: The Diocese should account for these procedures in relevant policies, including the Complaints Managing Policy and associated procedures. At this stage, this referral process is not formally accounted for or reflected in any relevant policies.</b></li> <li><b>We also refer to Recommendation 1 - The Diocese should continue to monitor the progress of its agencies, including Centacare, and their alignment with the NCSS.</b></li> </ul>					

Standard 7		Ongoing education and training			
Personnel are equipped with knowledge, skills and awareness to keep children and adults safe through information, ongoing education and training.					
Criterion 7.1 - Personnel are trained and supported to implement the safeguarding policies and procedures.		Developed & Embedded	Developed	Developing	Yet to Develop
7.1.1	Personnel are provided regular education and training on safeguarding policies and procedures.	✓			
7.1.2	The entity's induction and refresher Safeguarding of Children and Adults training must as a minimum cover: <ul style="list-style-type: none"><li>• Code of Conduct.</li><li>• Safeguarding risk management.</li><li>• Safeguarding Policy and procedures.</li><li>• Complaints Handling Policy and procedures.</li><li>• reporting obligations; and</li><li>• e-safety training.</li></ul>	✓			
7.1.3	Records are maintained to ensure all personnel attend induction training and participate in refresher safeguarding training at least every three years.	✓			
7.1.4	All personnel with specific safeguarding responsibilities receive ongoing support and professional development to their role.	✓			
<b>Observations:</b> <ul style="list-style-type: none"><li>• Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>• The Diocese previously administered training through the Safe Church Awareness Workshops. As of 2025, the Diocese's training is now the 'Safeguarding and Safe Ministry Workshop.' In addition, they administer training modules via Sentrient. Records are kept and monitored via Sentrient of personnel who are required/have completed the training.</li><li>• Additional training was provided to clergy at the 'September Clergy Seminar.'</li><li>• Additional training was provided to parish secretaries at the 'Parish Secretaries Seminar.'</li></ul>					

<ul style="list-style-type: none"> <li>Additional training was provided by the Project Manager to parish staff, on the implementation and use of the 'Safeguarding Manual.'</li> <li>New employees undertake several induction training requirements from the Safeguarding and Safe Ministry Workshop, Sentrient online Child Protection module and additional Sentrient modules.</li> </ul>					
Criterion 7.2 - Personnel are supported to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child.		Developed & Embedded	Developed	Developing	Yet to Develop
7.2.1	<p>Education and training programs include materials addressing factors that may place children at risk of abuse, building knowledge to:</p> <ul style="list-style-type: none"> <li>understand the nature and impact of child abuse.</li> <li>understand the nature, factors, and impact of institutional abuse.</li> <li>identify risk factors, such as grooming behaviours; and</li> <li>understand, identify, and respond to abusive behaviours by a child towards another child.</li> </ul>	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>Training includes modules on factors that may place children at risk of abuse. Additional training is provided to clergy at Clergy Seminars.</li> <li>Information is also provided to Youth Ministers through RISE training and handbook.</li> <li>Interviews undertaken during the fieldwork aspect of this audit revealed a strong commitment by personnel to managing disclosures carefully. The Diocese is commended for the development of their Safeguarding Manual which has been provided to all parishes. The manual provides guidance on safeguarding procedures, including when someone makes a disclosure. The interviews conducted with clergy and parish personnel indicate that there is an embedded understanding of how to manage disclosures.</li> </ul>					
Criterion 7.3 – Personnel are supported to recognise the factors that contribute to adult abuse, with a focus on adults at risk.		Developed & Embedded	Developed	Developing	Yet to Develop
7.3.1	<p>Education and training programs include materials addressing factors that may place adults at risk of abuse, building knowledge to:</p> <ul style="list-style-type: none"> <li>understand the nature and impact of adult abuse.</li> <li>understand the nature, factors, and impact of institutional abuse.</li> <li>identify risk factors, such as abuse of power, and exploitation.</li> <li>recognise how adults and institutions can be groomed, including power imbalances can be exploited; and</li> <li>understand what could make specific adults at increased risk of abuse.</li> </ul>	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>Training includes modules on factors that may place adults at risk of abuse. Additional training is provided to clergy at Clergy Seminars.</li> <li>Particular modules include subjects such as power imbalances and risk factors for adults at risk of abuse.</li> <li>This training was viewed during visits to the Chancery. Interviews conducted with relevant personnel demonstrated a commitment to and well-developed understanding of the training requirements.</li> </ul>					

Criterion 7.4 - Personnel have the information and skills to respond effectively to safeguarding risks, concerns, disclosures, and allegations of abuse.		Developed & Embedded	Developed	Developing	Yet to Develop
7.4.1	Education and training programs equip relevant personnel to appropriately respond to and support anyone bringing 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 reporting obligations under Commonwealth/State/Territory legislative and canon law, which includes: <ul style="list-style-type: none"> <li>reporting suspected criminal behaviour to police.</li> <li>mandatory reporting to child protection authorities.</li> <li>Reportable Conduct Scheme.</li> <li>reporting to other regulatory authorities or government departments; and</li> <li>Canonical reporting requirements.</li> </ul>	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>The Safeguarding and Safe Ministry Workshop/training modules delivered via Sentrient includes training on how to appropriately respond to and support anyone bringing forward concerns, disclosure, and allegations of abuse. The training also covers record keeping and privacy, and reporting obligations in NSW. Clergy are provided with additional training at the Clergy Seminar.</li> </ul>					
Criterion 7.5 - Personnel receive training and information on how to build culturally safe environments for children and adults.		Developed & Embedded	Developed	Developing	Yet to Develop
7.5.1	Cultural safety training is provided to equip personnel to create, culturally safe environments for Aboriginal and Torres Strait Islander people.	✓			
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.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>Diversity is covered in the Safeguarding and Safe Ministry training Workshops. It also been launched for all employees via Sentrient.</li> <li>Further, there was evidence provided during parish visits of a commitment to building culturally safe environments for children and adults. For example, at the Orange Parish, they conduct multicultural events for all members of the parish to attend.</li> </ul>					

Standard 8	Safe physical and online environments				
<i>Physical and online environments promote safety and contain appropriate safeguards to minimise the opportunity for children and adults to be harmed.</i>					
Criterion 8.1 – The Safeguarding Risk Management Strategy addresses both physical and online risks, without compromising the individual’s right to privacy or wellbeing.	Developed & Embedded	Developed	Developing	Yet Develop	to

8.1.1	<p>Both physical and online risks are addressed within the provision of ministry and/or services including risks arising from:</p> <ul style="list-style-type: none"> <li>• one-to-one interactions between an adult and a child;</li> <li>• ministries and/or services such as counselling, home visits, outreach, one-to-one tuition, the sacrament of reconciliation, spiritual direction and mentoring;</li> <li>• potential physical contact between the penitent and the confessor where the sacrament of reconciliation is celebrated;</li> <li>• one-to-one interaction with adults at risk;</li> <li>• child-to-child interactions.</li> <li>• adult-to-child interactions;</li> <li>• adult-to-adult interactions (with consideration to power imbalances); and</li> <li>• the nature of physical spaces.</li> </ul> <p>Wherever possible, these interactions are conducted in an open or visible space, or within clear line of sight of another adult.</p>		✓		
8.1.2	The entity's policies require the safe use of online applications for children and adults to learn, communicate and seek help.	✓			
8.1.3	Personnel are involved in identifying and mitigating physical and online risks to children and adults.	✓			

**Observations:**

- The Diocese is commended for its detailed 'Acceptable Use of Electronic Communication Systems and Devices Policy'. The Policy requires the safe use of online communication in safeguarding children and adults at risk and is wholly consistent with the Safeguarding Policy and Code of Conduct.
- The Diocese has distributed E-Safety material to parishes, families and communities. E-Safety Resources are easily accessible via the Safeguarding menu on the website.
- Risk assessments are undertaken with respect to the online and physical environments (e.g., risk assessment provided of the Debutante Ball at Cowra). Parishes are supported in undertaking risk assessments and can request support from the Project Manager and/or Safeguarding Coordinator.
- Reconciliation for children is conducted in open spaces and visible to others (i.e., not in Confessionals). For example, reconciliations at the Blayney Parish are conducted on the altar/sanctuary when involving children. We do note that some parishes had different practices with respect to reconciliation; for example, Gilgandra conducts adult reconciliation practices in an old-style confessional. At Blayney Parish, adult reconciliation is held in a glass see-through room. Notwithstanding this, there is a common ad embedded practice that child reconciliations are conducted in an open space visible to other adults.
- During discussion with one Parish, it was identified that the parish priest's living quarters is in the presbytery, which also houses the parish office. The parish undertakes all possible measures, including locking the door between the office and the presbytery, to ensure that these spaces remain appropriately separated.
- At another parish, it was identified that the parish priest's living quarters is located in the presbytery which also houses the parish office and is occasionally used to conduct meetings (i.e., meetings are conducted in the lounge room). These meetings do not include children. We recommend that further measures are implemented to ensure there is a clear separation between these spaces.
- A further example is the Prison Ministry. We note that robust measures are in place to safeguarding interactions between clergy participating in the prison ministries and those who are incarcerated. Clergy undertaking this program have to comply with the policies and procedures of both organisations (i.e., the Diocese and the entity conducting the prison) and are required to undertake professional supervision, ongoing training and update professional learning arrangements.
- **Recommendation 5: The Diocese should continue to ensure that reconciliation is conducted in a safe and open environment for children. Noting slight inconsistencies across parishes in relation to adult reconciliation, we would recommend that the Diocese continues to monitor the practices in parishes and considers implementing a**

<b>uniform/documented approach to reconciliation across the Diocese that aligns with best practice.</b>					
<ul style="list-style-type: none"> <li><b>Recommendation 6: The Diocese should review the living quarters of the parish priest (as discussed above) to ensure that it is appropriately separated from the parish office.</b></li> </ul>					
Criterion 8.2 - The online environment is used in accordance with the Code of Conduct and Safeguarding policy.		Developed & Embedded	Developed	Developing	Yet to Develop
8.2.1	Personnel access and use online environments in line with the entity's Code of Conduct, Privacy Act and relevant communication protocols.	✓			
8.2.2	The online environment is monitored, and breaches are managed in accordance with disciplinary, or other relevant policies and reported to the leadership.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>The Diocese is commended for its detailed 'Acceptable Use of Electronic Communication Systems and Devices Policy'. The Policy requires the safe use of online communication in safeguarding children and adults at risk. This Policy is consistent with the Code of Conduct and the Privacy Act, as well as best practice.</li> <li>Breaches of the online environment are dealt with under the Acceptable Use of Electronic Communication Systems and Devices Policy and the Code of Conduct.</li> </ul>					
Criterion 8.3 - Risk management plans address the range of settings, activities, and physical environments in which ministry and/or service occur.		Developed & Embedded	Developed	Developing	Yet to Develop
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.	✓			
<b>Observations:</b> <ul style="list-style-type: none"> <li>Requirements of the indicators are in place. No recommendations for improvement noted.</li> <li>The Safeguarding Policy, Risk Assessment Policy and Code of Conduct outlined the processes in place to assess and manage risk if the Diocese becomes aware of the presence of someone who poses an unacceptable risk to others within their ministry and/or service. Other relevant policies and procedures include: <ul style="list-style-type: none"> <li>The Managing Complaints and Concerns Policy;</li> <li>The Management of Allegations against Employees procedure;</li> <li>The Management of Historical Claims procedure;</li> <li>The Reportable Conduct Scheme procedure.</li> </ul> </li> <li>During fieldwork, the Diocese was able to demonstrate practices they implement where they become aware of someone who poses an unacceptable risk. This included the implementation of risk assessment and safety management plans.</li> </ul>					
Criterion 8.4 – Where facilities and services are contracted to and from third parties, contractual arrangements specify safeguarding considerations.		Developed & Embedded	Developed	Developing	Yet to Develop
8.4.1	If a third party provides services or uses the organisations facilities appropriate safeguarding policies and practices are in place.		✓		
<b>Observations:</b> <ul style="list-style-type: none"> <li>There is limited occurrences of a third party providing a service or using the Diocese's facilities. However, during a visit to a Parish, it was identified that a music tutor uses an old convent building to conduct tutoring. While there is a third party</li> </ul>					

agreement in place, it was non-specific to safeguarding. Following the audit, the Diocese has modified the third-party agreement template to include safeguarding. The Project Manager and Safeguarding Officer will be meeting with Parishes to support them in establishing third party agreements where necessary.

- **Recommendation 7: The Diocese should ensure that all third parties (e.g., music tutors) are made aware of the changes to third party agreements, including the expectations and requirements with respect to safeguarding.**

Standard 9		Continuous improvement			
Entities regularly review and improve implementation of their systems for keeping children and adults safe.					
Criterion 9.1 - The safeguarding practices for the protection of children and adults at risk are regularly reviewed.		Developed & Embedded	Developed	Developing	Yet to Develop
9.1.1	The Safeguarding Implementation Plan outlines how safeguarding practices are monitored and reviewed, and how this information is reported.	✓			
9.1.2	The Church Authority monitors the implementation of the National Catholic Safeguarding Standards and co-ordinates annual local self-assessment checks.			✓	
9.1.3	The Safeguarding Policy is subject to review at least every three years and outcomes of this review are documented.	✓			
<b>Observations:</b> <ul style="list-style-type: none"><li>• The Safeguarding Implementation Plan is commended. It is detailed and includes features such as priorities, actions, responsible persons, target complete date, and status/comments.</li><li>• The Safeguarding Policy is subject to review following the recommendations from this audit, or otherwise July 2027 (three years).</li><li>• In relation to Standard 9.1.2: We note that the Church Authority is strongly committed to and promotes the NCSS. At this stage, there are no coordinated annual local self-assessment checks in place. Throughout this audit process, the Project Manager and other personnel undertook quality assurance checks in the Parishes, and actively collaborated with the Parishes to develop and implement a safeguarding manual.</li><li>• <b>Recommendation 8: Consistent with the implementation plan, we would recommend that the Diocese formalises a coordinated annual self-assessment check to ensure continued compliance with the NCSS.</b></li></ul>					
Criterion 9.2 – Concerns and complaints are analysed to identify causes and systemic failures in safeguarding practices.		Developed & Embedded	Developed	Developing	Yet to Develop
9.2.1	All individual incidents or complaints relating to safeguarding practices and/or failures are considered by the leadership to identify systemic patterns and support continuous improvement.	✓			
<b>Observations</b> <ul style="list-style-type: none"><li>• Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>• The Diocese maintains records of complaints/incidents and undertakes risk assessments.</li><li>• The Diocese provided the auditor with examples where they have implemented changes following complaints, however they have not been repeated here to ensure confidentiality.</li><li>• Complaints and/or failures are tabled at the Safeguarding Advisory Panel meetings, and are responded to accordingly. For any urgent matters, the Diocese undertakes proactive steps to mitigate risks to any children or adults at risk.</li></ul>					
Criterion 9.3 - The Church Authority reports on the findings of its safeguarding reviews.		Developed & Embedded	Developed	Developing	Yet to Develop

9.3.1	The findings of relevant reviews of safeguarding policies, procedures, and practices to are reported to stakeholders.	✓			
9.3.2	The findings of audits or reviews undertaken or validated by ACSL are made public.	Not applicable – this is the first audit by ACSL			
<b>Observations:</b> <ul style="list-style-type: none"><li>• Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>• The Terms of Reference of the Safeguarding Advisory Panel include the requirement to issue formal reports. Formal reports are to be issued at the end of 2025, following one year of formation. An article is being prepared for the December Catholic Observer summarising the work completed to date.</li><li>• Information about this audit process has been made public and transparent, including via bulletins/newsletters to Parishes.</li></ul>					

Standard 10		Policies and procedures support the safety of children and adults			
Policies and procedures document how the entity is safe for children and adults.					
Criterion 10.1 - Policies and procedures address the National Catholic Safeguarding Standards.		Developed & Embedded	Developed	Developing	Yet to Develop
10.1.1	All relevant policies and procedures reference appropriate safeguarding approaches, requirements and responsibilities.	✓			
Observations:					
<ul style="list-style-type: none"><li>Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>The Safeguarding Policy, Code of Conduct, Risk Management Policy and Complaint Handling Policy reference to appropriate safeguarding approaches, requirements and responsibilities. For example, the Safeguarding Policy is consistent with the NCSS, covers the need for screening for employees (e.g., WWCC, National Criminal History Checks), online communication, and reporting requirements.</li></ul>					
Criterion 10.2 - Policies and procedures are accessible and easy to understand.		Developed & Embedded	Developed	Developing	Yet to Develop
10.2.1	The policies and procedures relevant to safeguarding are readily available and accessible to all personnel.	✓			
Observations:					
<ul style="list-style-type: none"><li>Requirements of the indicators are in place. No recommendations for improvement noted.</li><li>Policies and procedures are relevant to safeguarding and are readily available to all personnel/the public via the Diocese’s website. Further, policies are distributed to all staff via Sentrient, which includes a ‘read and acknowledged’ feature.</li></ul>					
Criterion 10.3 - Best practice models and stakeholder consultation inform the development and review of policies and procedures.		Developed & Embedded	Developed	Developing	Yet to Develop
10.3.1	There are processes in place to monitor how safeguarding policies and procedures are being implemented.	✓			
10.3.2	There is a process in place to develop and review safeguarding policies and procedures.	✓			
Observations:					
<ul style="list-style-type: none"><li>Requirements of the indicators are in place. No recommendations for improvement noted.</li></ul>					



- A detailed implementation plan has been drafted and is continuing to be updated by relevant personnel.
- Policies and procedures are reviewed in accordance with ACSL guidelines/best practices, or as required. All policies and procedures include a 'version tracker' on page 1, to monitor what changes have been implemented.
- Parishes or ministries can escalate issues to the Advisory Panel for consideration, or they can contact the Safeguarding Coordinator. Parishes can also request support for issues such as specific events and risk assessments. This process triggers reflection and review of the need to incorporate changes or implement initiatives to support parishes.
- The Diocese has developed a 'Policy Approval Process Chart' to demonstrate policy review processes.
- The Project Manager maintains a strong collaborate relationship with their counterparts from other agencies (such as Education and Centacare) and they meet regularly to share information.

Criterion 10.4 - Church leaders champion and model best practice implementation of the National Catholic Safeguarding Standards.		Developed & Embedded	Developed	Developing	Yet to Develop
10.4.1	The Church Authority and leaders promote the NCSS and enact all policies and procedures relevant to safeguarding.	✓			

**Observations:**

- Requirements of the indicators are in place. No recommendations for improvement noted.
- Policies are available on the Diocesan Website.
- The Safeguarding Statement is available on the Diocesan Website.
- Safeguarding articles are featured in the Catholic Observer and Parish Bulletins, including promotion of the 'Safeguarding Sunday Events.'
- Interviews undertaken with Bishop McKenna and other Church personnel revealed a strong commitment to and promotion of the NCSS standards.

Criterion 10.5 - Personnel understand and implement the policies and procedures.		Developed & Embedded	Developed	Developing	Yet to Develop
10.5.1	Personnel are encouraged to reflect on their understanding and practical implementation of policies and procedures and provide feedback.	✓			

**Observations:**

- Requirements of the indicators are in place. No recommendations for improvement noted.
- Personnel have been distributed all policies via Sentrient and are required to read, review, and acknowledge the policies via Sentrient.
- Communication to personnel regarding new documents, policies, and procedures include support offer for anyone who may require assistance in understanding the content.
- During the September Clergy Seminar and Parish Secretaries Seminar, personnel were provided with an overview of the relevant policies. The Project Manager also provided additional training to Parish staff on the implementation and use of the Safeguarding Manual.



## 5. DETAILED FINDINGS

Recommendation #1		Priority 2
1.3.1	Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for the safeguarding of children and adults is clear.	
Details of finding	<p>The following points were noted:</p> <ul style="list-style-type: none"><li>• We note that Centacare leadership was subject to this audit (however, Centacare services were not). We understand that Centacare is compliant with the Child Safe Standards and are currently in the process of ensuring alignment with the NCSS.</li><li>• Centacare has commenced by implementing the Diocesan Code of Conduct and in the process of mapping their current policies with the requirement of the NCSS.</li><li>• The development of Centacare has been prioritised in the Implementation Plan.</li></ul>	
Recommendation	The Diocese should continue to monitor the progress of its agencies, including Centacare, and their alignment with the NCSS.	
Agreed Action	The Diocese should continue to monitor the progress of its agencies, including Centacare, and their alignment with the NCSS. Formalised processes should be implemented to alignment with the NCSS.	
Responsibility	Diocesan and Centacare Leadership.	
Due date	June 2026	

Recommendation #2		Priority 3
1.5.1	The Risk Management Plan considers the needs of children and adults at risk, 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.	
Details of finding	The following points were noted: <ul style="list-style-type: none"><li>• The Risk Management Plan is detailed and comprehensive. It has incorporated procedures to assess, evaluate, review, and oversee safeguarding practices, especially with respect to ministry and/or service.</li><li>• Notwithstanding this, the Risk Management Plan is focused on child-related risks.</li></ul>	
Recommendation	The Risk Management Plan is comprehensive with respect to child safeguarding. We recommend the Diocese considers updating the Risk Management Plan to refer to adults at risk.	
Agreed Action	The Risk Management Plan is comprehensive with respect to child safeguarding. We recommend the Diocese considers updating the Risk Management Plan to refer to adults at risk.	

<b>Responsibility</b>	Safeguarding Officer/Project Manager
<b>Due date</b>	April 2026

Recommendation #3		Priority 3
4.1.2	The Complaints Handling Policy and practices address barriers that may prevent a disclosure of abuse being made and that hinders personnel from recognising and responding appropriately.	
Details of finding	<p>The following points were noted:</p> <ul style="list-style-type: none"><li>The Diocese as conducted training with relevant personnel on barriers that may prevent a disclosure of abuse being made and that hinders personnel from recognising and responding appropriately. However, this is not codified in the Complaints Management Policy.</li></ul>	
Recommendation	We recommend that an amendment is made to the Complaints Management Policy and associated procedures to ensure that it addresses barriers that may prevent a disclosure of abuse being made.	
Agreed Action	The Diocese should codify the training provided to relevant personnel, that deals with barriers that may prevent disclosure being made.	
Responsibility	Safeguarding Officer/Project Manager	
Due date	April 2026	

Recommendation #4		Priority 2
6.5.1	Appropriate pastoral care is provided to complainants.	
6.6.1	Appropriately trained personnel engaged in consultation with the respondents 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.	
Details of finding	The following points were noted: <ul style="list-style-type: none"><li>With respect to pastoral care for complainants, it is the practice of the Diocese to refer individuals to Centacare for any support that is required. Support is overseen by Centacare. At this stage, this referral process is not formally accounted for or reflected in any relevant policies.</li></ul>	
Recommendation	The Diocese should account for these procedures in relevant policies, including the Complaints Managing Policy and associated procedures. At this stage, this referral process is not formally accounted for or reflected in any relevant policies.	
Agreed Action	The Diocese should account for these procedures in relevant policies, including the Complaints Managing Policy and associated procedures. At this stage, this referral process is not formally accounted for or reflected in any relevant policies.	
Responsibility	Safeguarding Officer/Project Manager	

<b>Due date</b>	February 2026
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<b>Recommendation #5</b>		<b>Priority 2</b>
<b>8.1.1</b>	Both physical and online risks are addressed within the provision of ministry and/or services including risks arising from: <ul style="list-style-type: none"> <li>one-to-one interactions between an adult and a child;</li> <li>ministries and/or services such as counselling, home visits, outreach, one-to-one tuition, the sacrament of reconciliation, spiritual direction and mentoring;</li> <li>potential physical contact between the penitent and the confessor where the sacrament of reconciliation is celebrated;</li> <li>one-to-one interaction with adults at risk;</li> <li>child-to-child interactions.</li> <li>adult-to-child interactions;</li> <li>adult-to-adult interactions (with consideration to power imbalances); and</li> <li>the nature of physical spaces.</li> <li>Wherever possible, these interactions are conducted in an open or visible space, or within clear line of sight of another adult.</li> </ul>	
<b>Details of finding</b>	The following points were noted: <ul style="list-style-type: none"> <li>Reconciliation for children is conducted in open spaces and visible to others (i.e., not in Confessionals). For example, reconciliations at the Blayney Parish are conducted on the altar/sanctuary when involving children. We do note that some parishes had different practices with respect to reconciliation; for example, Gilgandra conducts adult reconciliation practices in an old-style confessional. At Blayney Parish, adult reconciliation is held in a glass see-through room. Notwithstanding this, there is a common and embedded practice that child reconciliations are conducted in an open space visible to other adults.</li> </ul>	
<b>Recommendation</b>	The Diocese should continue to ensure that reconciliation is conducted in a safe and open environment for children.	
<b>Agreed Action</b>	Noting slight inconsistencies across parishes in relation to adult reconciliation, we would recommend that the Diocese continues to monitor the practices in parishes and considers implementing a uniform/documented approach to reconciliation across the Diocese that aligns with best practice.	
<b>Responsibility</b>	Safeguarding Officer/Project Manager	
<b>Due date</b>	April 2026	

<b>Recommendation #6</b>		<b>Priority 2</b>
<b>8.1.1</b>	Both physical and online risks are addressed within the provision of ministry and/or services including risks arising from:	

	<ul style="list-style-type: none"> <li>one-to-one interactions between an adult and a child;</li> <li>ministries and/or services such as counselling, home visits, outreach, one-to-one tuition, the sacrament of reconciliation, spiritual direction and mentoring;</li> <li>potential physical contact between the penitent and the confessor where the sacrament of reconciliation is celebrated;</li> <li>one-to-one interaction with adults at risk;</li> <li>child-to-child interactions.</li> <li>adult-to-child interactions;</li> <li>adult-to-adult interactions (with consideration to power imbalances); and</li> <li>the nature of physical spaces.</li> </ul> <p>Wherever possible, these interactions are conducted in an open or visible space, or within clear line of sight of another adult.</p>	
<b>Details of finding</b>	<p>The following points were noted:</p> <ul style="list-style-type: none"> <li>At another parish, it was identified that the parish priest's living quarters is located in the presbytery which also houses the parish office and is occasionally used to conduct meetings (i.e., meetings are conducted in the lounge room). These meetings do not include children. We recommend that further measures are implemented to ensure there is a clear separation between these spaces.</li> </ul>	
<b>Recommendation</b>	The Diocese should review the living quarters of the parish priest (as discussed above) to ensure that it is appropriately separated from the parish office.	
<b>Agreed Action</b>	The Diocese should review the living quarters of the parish priest (as discussed above) to ensure that it is appropriately separated from the parish office.	
<b>Responsibility</b>	Safeguarding Officer/Project Manager	
<b>Due date</b>	February 2026	

Recommendation #7		Priority 2
8.4.1	If a third party provides services or uses the organisations facilities appropriate safeguarding policies and practices are in place.	
Details of finding	<p>The following points were noted:</p> <ul style="list-style-type: none"><li>There are limited occurrences of a third party providing a service or using the Diocese's facilities. However, during a visit to a Parish, it was identified that a music tutor uses an old convent building to conduct tutoring. While there is a third party agreement in place, it was non-specific to safeguarding. Following the audit, the Diocese has modified the third-party agreement template to include safeguarding. The Project Manager and Safeguarding Officer will be meeting with Parishes to support them in establishing third party agreements where necessary.</li><li>The Project Manager and Safeguarding Officer will be meeting with Parishes to support them in establishing third party agreements where necessary.</li></ul>	
Recommendation	The Diocese should ensure that all third parties (e.g., music tutors) are made aware of the changes to third party agreements, including the expectations and requirements with respect to safeguarding.	

<b>Agreed Action</b>	The Diocese should ensure that all third parties (e.g., music tutors) are made aware of the changes to third party agreements, including the expectations and requirements with respect to safeguarding.
<b>Responsibility</b>	Safeguarding Officer/Project Manager
<b>Due date</b>	April 2026

Recommendation #8		Priority 3
9.1.2	The Church Authority monitors the implementation of the National Catholic Safeguarding Standards and co-ordinates annual local self-assessment checks.	
Details of finding	The following points were noted: <ul style="list-style-type: none"><li>In relation to Standard 9.1.2: We note that the Church Authority is strongly committed to and promotes the NCSS. At this stage, there are no coordinated annual local self-assessment checks in place. Throughout this audit process, the Project Manager and other personnel undertook quality assurance checks in the Parishes, and actively collaborated with the Parishes to develop and implement a safeguarding manual.</li></ul>	
Recommendation	Consistent with the implementation plan, we would recommend that the Diocese formalises a coordinated annual self-assessment check to ensure continued compliance with the NCSS.	
Agreed Action	Consistent with the implementation plan, we would recommend that the Diocese formalises a coordinated annual self-assessment check to ensure continued compliance with the NCSS.	
Responsibility	Diocesan Leadership	
Due date	June 2026	

## Appendix A

### Maturity Assessment

	General	Processes & Systems	People & Resources
<b>Yet Develop to</b>	As an entity we are unable to demonstrate that the requirements of the indicator are in place and will implement the necessary strategies developed through the Standards Action Plan.	Processes may be in place however the specific requirements of the indicator have not been addressed. The actions generated through the Standards Action Plan will be implemented.	At an entity level resources have yet to be assigned. The people and resources will be determined and allocated in the Standards Action Plan.
<b>Developing</b>	Our entity has begun to address the requirements of the indicator, however processes are developing and not universally applied.	Some relevant processes have been implemented which align with the requirements of the indicator, however they are: <ul style="list-style-type: none"> <li>• siloed; and/or</li> <li>• undocumented; and/or</li> <li>• inconsistent; and/or</li> <li>• lack clarity.</li> </ul>	Personnel capabilities vary across the entity and resources and responsibility are not formally assigned. This will be addressed in the Standards Action Plan.
<b>Developed</b>	Our entity is addressing the indicator and is in the process of implementing its requirements. The gaps will be highlighted and addressed through the Standards Action Plan.	Relevant processes and systems have been defined and developed but are yet to be implemented across the full operations of the entity. A plan is being developed to fully implement processes and systems.	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. This will be remediated through the Standards Action Plan.
<b>Developed and embedded</b>	The entity can demonstrate that indicator requirements are formally embedded. Processes are operating effectively, and opportunities provided for continuous improvement.	Relevant processes are integrated and coordinated, including remote operations and reviews/audits of activities.	Personnel are trained to detect and report on deviations or break downs in processes.  Resources have been assigned to monitor and address requirements.

## Appendix B

### Audit finding priorities

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

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

## 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.

<b>Abuse</b>	when used throughout the NCSS document this is an inclusive term covering both child and adult abuse
<b>Abuse of Power</b>	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.
<b>Accessible language</b>	means information is provided in multiple formats for individuals with different levels of English literacy and proficiency, modes of communication, languages, and cognitive abilities.
<b>Adult</b>	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.
<b>Adult abuse</b>	<p>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.</p> <p>There are several categories of abuse of adults, such as:</p> <ul style="list-style-type: none"> <li>• Sexual abuse*</li> <li>• Physical abuse*</li> <li>• Emotional/psychological abuse*</li> <li>• Neglect*</li> <li>• Elder abuse*</li> <li>• Financial abuse*</li> <li>• Exploitation*</li> </ul> <p>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.</p>
<b>Adult at risk</b>	means any person aged 18 years and over who is at increased risk of experiencing abuse, such as people:



	<ul style="list-style-type: none"> <li>• who are elderly.</li> <li>• with a disability.</li> <li>• who suffer from mental illness.</li> <li>• who have diminished capacity.</li> <li>• who have cognitive impairment.</li> <li>• who have suffered previous abuse.</li> <li>• who are experiencing transient risks.</li> <li>• who in receiving a ministry or service are subject to a power imbalance.</li> <li>• who are from a culturally or linguistically diverse background/</li> <li>• who are of diverse sexuality/</li> <li>• who have any other impairment or adversity that makes it difficult for them to protect themselves from abuse.</li> </ul>
<b>Allegation</b>	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”.
<b>Audit</b>	means a mechanism to assess how a Church Authority, ministry or entity governed by a Church Authority, is implementing the National Catholic Safeguarding Standards.
<b>Australian Catholic Bishops Conference</b>	means the assembly of Bishops of Australia exercising together certain pastoral offices for the Catholics of Australia.
<b>Bishop</b>	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
<b>Canon law</b>	means the revised code of canon law promulgated by His Holiness Pope John Paul II in 1983 and the Code of Canons of the Eastern Churches as promulgated in 1990 and any other universal or legislation promulgated by the competent ecclesiastical authority.
<b>Canonical Offence</b>	<p>means canonical crimes<sup>1</sup> of sexual abuse committed by clerics and religious are:</p> <ul style="list-style-type: none"> <li>• forcing someone, by violence or threat or through abuse of authority, to perform or submit to sexual acts.</li> <li>• performing sexual acts with a minor or a vulnerable person.</li> <li>• 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.</li> </ul> <p><sup>1</sup> The canonical crimes/delicts/offences committed by clerics or religious as stated in Art. 1 §1 a) of <i>Vos Estis Lux Mundi</i>.</p> <p><sup>2</sup> Definition of vulnerable person as stated in Art. 1 §2 b) of <i>Vos Estis Lux Mundi</i>: “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.</p>
<b>Catholic Religious Australia</b>	CRA is the conference of major superiors comprising leaders of religious institutes and societies of apostolic life within the Catholic Church in Australia.

<b>Certification</b>	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.
<b>Child/ren</b>	means individuals under 18 years of age.
<b>Child abuse</b>	<p>There are different legal definitions of child abuse in Australia. Definition sourced from the Australian Institute of Family Studies:</p> <p><a href="https://aifs.gov.au/cfca/publications/reporting-abuse-and-neglect">https://aifs.gov.au/cfca/publications/reporting-abuse-and-neglect</a></p> <p>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.</p> <p>Child abuse and neglect is commonly divided into five subtypes:</p> <ul style="list-style-type: none"> <li>• physical abuse</li> <li>• emotional/psychological abuse</li> <li>• neglect</li> <li>• sexual abuse</li> <li>• exposure to family violence</li> </ul>
<b>Church Authority</b>	<p>means:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• the competent authority, howsoever titled, exercising the ministry of governance for religious institutes in Australia in accordance with their Constitutions; or</li> <li>• for ministerial PJPS the competent authority in accordance with the statutes.</li> <li>• for any other Church entity, the senior authority within the organization in accordance with its rules.</li> </ul>
<b>Church Protocols</b>	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.
<b>Civil Standard</b>	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).
<b>Clergy</b>	includes bishops, priests and deacons.
<b>Clergy and religious from countries other than Australia</b>	means any cleric or member of a religious institute who is specifically recruited or welcomed from overseas by a Church Authority or entity.
<b>Cleric</b>	a member of the clergy.
<b>Clericalist/ism</b>	means an attitude toward clergy/religious characterised by an excessive deference and an assumption of their moral superiority. Pope Francis has said 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”.
<b>Cognitive impairment</b>	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: <a href="https://www.healthdirect.gov.au/cognitive-impairment">https://www.healthdirect.gov.au/cognitive-impairment</a>
<b>Complainant</b>	means any person who makes a complaint that may include any allegation, suspicion, concern, or report of a breach of the entity’s Code of Conduct. A complaint may also include disclosures made to an institution that may be about, or relate to, abuse in the entity’s context.
<b>Conflicts of interest</b>	means situations (perceived or actual) where a conflict arises between a person’s official duties and their private interests, which could influence the performance of those official duties. Such conflict generally involves opposing principles or incompatible wishes or needs and may occur when personnel function in multiple roles.
<b>Consecrated Life/Institute of Consecrated Life</b>	is an association of faithful in the Catholic Church erected by canon law whose members profess the evangelical counsels of chastity, poverty, and obedience by vows or other sacred bonds (as defined in the Code of Canon Law under canons 573–730).  Apart from being a member of an institute, consecrated life may also be lived individually; the Catholic Church recognises, as forms of individual consecrated life that are not members of institutes, namely that of hermits and consecrated virgins.
<b>Cultural safety</b>	means an environment that is safe for people of all ethnicities and cultural identities: where there is no assault, challenge, or denial of their identity, of who they are and what they need. It is about shared respect, shared meaning, shared knowledge, and experience, of learning, living and working together with dignity and truly listening.
<b>Dicastery</b>	means a department of the Roman Curia.
<b>Dignity or Right to Risk</b>	refers to enabling individuals the right (or dignity) to take reasonable risks. It recognises that restricting this right can stifle the individual’s growth, self-esteem 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 risk-taking. Inhibiting an individual’s ability to take risks erodes their dignity. Dignity of risk is therefore the principle of allowing an individual the dignity afforded by risk-taking, subsequently enhancing their personal growth and quality of life.’  (Joseph E Ibrahim and Marie-Claire Davis, ‘Impediments to Applying the “Dignity of Risk” Principle in Residential Aged Care Services: “Dignity of Risk” in Residential Aged Care’, Australasian Journal on Ageing 32, no. 3 (September 2013): 188–93)

<b>Diminished capacity</b>	<p>means if an adult needs to make a decision and is unable to carry out any part of this process (as listed below), they have impaired decision-making capacity.</p> <p>There are three elements to making a decision:</p> <ul style="list-style-type: none"> <li>• understanding the nature and effect of the decision;</li> <li>• freely and voluntarily deciding; and</li> <li>• communicating the decision in some way.</li> </ul>
<b>Diocese</b>	means a diocese, archdiocese, ordinariate or personal prelate of the Latin Church and an eparchy of an Eastern Church.
<b>Disability (persons with)</b>	means those who have physical, mental, intellectual, or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. (Article 2, United Nations Convention on the Rights of Persons with Disabilities.)
<b>Diversity</b>	means a range of people who have various racial, ethnic, socioeconomic, and cultural backgrounds and various lifestyles, experience, and interests.
<b>Diverse sexuality</b>	refers to all the diversities of sex characteristics, sexual orientations, and gender identities, without the need to specify each of the identities, behaviours, or characteristics that form this plurality.
<b>Elder abuse</b>	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.
<b>Emotional abuse (adults)</b>	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.
<b>Emotional abuse (children)</b>	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.
<b>Entity</b>	means a diocese, religious institute, ministerial PJP (including their agencies) or association recognised as Catholic in accord with canon law.
<b>Exploitation</b>	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.
<b>Exposure to family violence</b>	is generally considered to be a form of psychologically abusive behaviour, where a child is present (hearing or seeing) while a parent or sibling is subjected to physical abuse, sexual abuse, or psychological maltreatment, or is visually exposed to the damage caused to persons or property by a family member's violent behaviour.
<b>Financial abuse</b>	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.
<b>Formation/program</b>	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.
<b>Good Standing</b>	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.
<b>Grooming (child)</b>	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.
<b>Grooming (adult)</b>	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.
<b>Guardian</b>	refers to the person(s) who has the legal authority to care for the personal and property interests of another person.
<b>Institutional abuse</b>	<p>means abuse or poor care within an institution or specific care setting. Possible causes of institutional abuse include:</p> <ul style="list-style-type: none"> <li>• a "closed" culture within an organisation where transparency is discouraged.</li> <li>• lack of flexibility and choice for people using the service.</li> <li>• failure to properly check the backgrounds and interview staff.</li> <li>• inadequate training.</li> <li>• lack of safeguarding policies and procedures.</li> <li>• lack of support of staff by management.</li> <li>• poor supervision; and</li> <li>• poor standards of care.</li> </ul>
<b>Lay/lay person</b>	means members of the Catholic Church and Church personnel other than bishops, priests, deacons and religious.
<b>Leaders</b>	means personnel who are responsible for important governance decisions within a Church entity and/or who lead and coordinate Church improvement initiatives.
<b>Mentor</b>	means an experienced and trusted advisor or a person who gives a younger or less experienced person help and advice over a period.
<b>Ministerial PJP</b>	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.
<b>Ministry</b>	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.
<b>NDIS Worker Screening Check</b>	The NDIS Worker Screening Check is an assessment of whether a person who 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 <a href="https://www.ndiscommission.gov.au/about/ndis-worker-screening-check">https://www.ndiscommission.gov.au/about/ndis-worker-screening-check</a>
<b>Neglect (adult)</b>	is the failure of a carer to provide the necessities of life to a person for whom they are caring.
<b>Neglect (child)</b>	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.
<b>Offender</b>	means a person who has admitted abuse or whose responsibility for abuse has been determined by a court of law (criminal or civil), statutory or Church procedure.
<b>Organisation</b>	means a ministry and/or service operating under the governance of a recognised authority (such as a legal entity) and/or a Church Authority.
<b>Pastoral care</b>	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.
<b>Personnel (Church personnel)</b>	means a cleric, religious or other person who is employed by the entity or engaged on a contract, subcontract, voluntary or unpaid basis.
<b>Physical abuse</b>	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.
<b>Professional/pastoral supervision</b>	means a professional activity in which personnel are engaged in reflection and 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.
<b>Protective behaviours program</b>	Is a type of abuse prevention program and means an age-appropriate structured education program to equip children and young people with the skills and knowledge to enhance their personal safety.
<b>Reflective practice</b>	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.
<b>Religious institute</b>	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.
<b>Religious</b>	means a member of an institute of consecrated life or a society of apostolic life.
<b>Respondent</b>	means a person against whom a complaint is made.
<b>Review</b>	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.
<b>Risk-based audit and Review Framework</b>	means a framework for assessing the implementation of the National Catholic Safeguarding Standards that reflects a proportionate response based on the risk profile of the Church Authority.
<b>Risk Profile</b>	means an assessment against key safeguarding risk factors.
<b>Safeguarding</b>	refers to proactive measures designed to protect the health, wellbeing, and human rights of individuals. These measures allow children, young people and adults to live free from abuse, harm and neglect. Within the life of the Church, safeguarding includes pastoral, liturgical and spiritual responses through engagement in the Sacraments and the life of the Church.
<b>Safeguarding Committee</b>	means a committee established to advise and support the Church Authority on all matters relating to safeguarding, including the development and implementation of a Safeguarding Implementation Plan and 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.
<b>Safeguarding Culture</b>	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.
<b>Safeguarding Commitment Statement</b>	means a Commitment Statement describing an entity's commitment to keep children and adults safe from harm. It informs the entity's safeguarding culture.
<b>Safeguarding Co-ordinator</b>	means an individual who champions safeguarding and co-ordinates the implementation of the National Catholic Safeguarding Standards within an entity.
<b>Safeguarding Implementation Plan</b>	means a documented plan which articulates actions to be taken across the entity to ensure safeguarding practices are in place. It includes actions, strategies, responsibilities, delegations, and accountabilities, and tracks review and progress. It is overseen by the Safeguarding Committee.
<b>Safeguarding policies and procedures</b>	means any policies or procedures of the entity that address elements of safeguarding children and adults. For example, but not limited to:



	<ul style="list-style-type: none"> <li>• recruitment.</li> <li>• risk management.</li> <li>• complaint handling; and</li> <li>• acceptable use of online applications.</li> </ul>
<b>Seminarian</b>	a student in a theological formation and education centre preparing for ordination as a priest.
<b>Seminary</b>	means a centre for the formation and education of students preparing for ordination.
<b>Sexual abuse (adult)</b>	Sexual abuse is a form of sexual assault. Sexual abuse includes rape, indecent assault, sexual harassment, and sexual interference. Sexual activity with an adult who is incapacitated by a mental or physical condition (such as dementia) that impairs his or her ability to grant informed consent, is defined as sexual assault/abuse. Sexual assault/abuse includes where through force, threats or abuse of authority, an individual commits a canonical offence or forces someone to perform or submit to sexual acts. Sexual assault is a crime.
<b>Sexual abuse (child)</b>	refers to exposing a child to any form of sexual activity. This may or may not involve physical contact. This may take the form of taking sexually explicit photographs or videos of children, forcing children to watch or take part in sexual acts and forcing or coercing children to have sex or engage in sexual acts with other children or adults.
<b>Spiritual abuse</b>	means abuse of a person that invokes a person's religious beliefs and faith to perpetrate harm. Spiritual abuse can occur as a secondary experience of abuse when abuse is perpetrated by someone in a position of spiritual authority and trust within the Church a
<b>Substantiated complaint</b>	means under the civil standard of proof an allegation of abuse for which the investigator finds that sufficient evidence exists to believe that the alleged conduct more likely than not occurred.
<b>Third parties</b>	means any individual, group or legal entity outside the Church entity who contract services and facilities to or from the Church entity.
<b>Transient Risk</b>	<p>means short-term risk, experienced by people at different stages in their life: e.g. when someone is vulnerable due to:</p> <ul style="list-style-type: none"> <li>• grief</li> <li>• bereavement</li> <li>• relationship breakdown</li> <li>• homelessness</li> <li>• unemployment</li> <li>• financial hardship</li> </ul>
<b>Trauma-informed and victim-centred support</b>	is a strengths-based framework which is founded on five core principles – safety, trustworthiness, choice, collaboration, and empowerment. Trauma-informed services do no harm: they do not re-traumatise or blame victims for their efforts to manage their traumatic reactions, and they embrace a message of hope and optimism that recovery is possible. In trauma-informed services, trauma survivors are seen as unique individuals who have managed their responses to the experiences as best that they could.



<b>Validation</b>	means an assessment by ACSL of any self-assessment, review or audit, undertaken to achieve ACSL Certification status.
<b>Working With Children Check</b>	means generic term used in the National Catholic Safeguarding Standards to denote the statutory screening requirement for people who work or volunteer in child-related work. There is not yet a single national framework setting out requirements for 'working with children' checks. Each State/Territory in Australia has its own system. They are one part of a Church entity's recruitment, selection, and screening practices.
<b>Working with Vulnerable People Check</b>	<p>means the Working with Vulnerable People (Background Checking) Act 2011 in the Australian Capital Territory which requires those working with children (and other vulnerable groups) to complete a Working with Vulnerable People Check and be registered before they can commence employment.</p> <p>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.</p> <p>To date, only the ACT and Tasmania have this requirement.</p>