



## DIOCESE OF SALE GUIDELINES

### FOR PARISH MINISTRY MEETINGS IN THE ONLINE ENVIRONMENT

#### Context, purpose and audience

The restrictions of being able to meet physically in Victoria in 2020 has precipitated the need to utilise the online environment for parish ministry. The scope of these guidelines is limited to parish ministry meetings<sup>1</sup> conducted online. It excludes guidance on streaming masses.

The purpose of these guidelines is two-fold:

- i. to safeguard children, young people under 18 years of age and adults at risk<sup>2</sup> who participate in ministry that is conducted online under the auspices of Parishes
- ii. to ensure that Church personnel comply with Privacy legislation in the use and storage of personal information.

The target audience for these guidelines are all Church personnel including clergy, employees and volunteers who lead ministries in parishes in the Diocese of Sale.

#### Approach

As there are a broad range of online platforms<sup>3</sup> which will continue to grow into the future, these guidelines will remain elastic by being focussed on principles to be adhered to rather than being prescriptive as to exactly how to manage the specific online platform for video/ tele conferencing.

#### Risks

There are a number of risk factors. In relation to safeguarding, one of the risks is that of 'grooming'. Church personnel need to be alert for this and appreciate that the grooming of a child is a crime in Victoria<sup>4</sup>. Predators consider the Church to be a 'soft target'<sup>5</sup>. So, it is not only the child that is at risk of grooming but the grooming of the church more broadly. In addition, adults at risk pose a unique set of risk factors which include the need to safeguard them from manipulation, particularly in the area of financial exploitation.

Other risks include the lack of adherence to privacy and security of personal information as set out by the *Privacy and Data Protection Act 2014* (Vic.) by those who manage and host online meetings.

#### Principles

Principles are universal and provide flexibility to those who conduct online parish meetings. All eight principles need to be adhered to and are summarised as follows:

1. Undertake the pre-requisite requirements and post meeting actions
2. Every participant is to sign a 'Consent to Participate and a Code of Conduct' form
3. Treatment of personal information according to the Australian Privacy Principles
4. Clearance is required for guest speakers from the Bishop's Office
5. Adherence to ratios of screened adults to participants
6. Prevent external 'unauthorised' people attending online meetings
7. Be vigilant about 'interactions' between participants
8. Recordings should not be made.

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<sup>1</sup>Includes but not limited to Bible/Prayer/Rosary, RCIA, Choir, Family Groups, Youth Ministry, Parish Council.

<sup>2</sup> Adults at risk cover a broad range of areas including those suffering temporary risks like bereavement and marriage breakdown. This also includes those with cognitive impairment and those who have appointed guardians and powers of attorney to manage their financial affairs or medical appointments.

<sup>3</sup> Including Zoom, Google Meet, Skype, Microsoft Teams, Click Meeting, GoToMeeting to name a few.

<sup>4</sup> Crimes Amendment (Grooming) Act 2014 (Vic.)

<sup>5</sup> Carl Collins, Founder and Director of Child Protection Solutions, CPSL Webinar on 5 Aug 2020.



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#### Principle 1 –Undertake pre-requisite requirements and post meeting actions

Those hosting ministry online under the auspices of the Parish need to comply with the following pre-requisite requirements and post meeting actions.

##### *Pre-requisite requirements*

Every Host (and Co-host) needs to:

- Hold a valid Working with Children Check (WWCC).
- Have completed the Diocese of Sale's Online Safeguarding Children Module.
- Sign a Parish Code of Conduct<sup>6</sup> (valid for one year) and submit this to the Parish.
- Attend a 60-minute Preparatory Safeguarding Online session (valid for one year) with the Diocesan Professional Standards Officer.

##### *Post meeting actions:*

1. At the end of the meeting, scan and save the list of participants who attended. Send this information and any additional notes and observations of behaviours within 24 hours to the Parish Secretary or Parish Safeguarding Officer who will keep a Parish Event Log. Any other feedback received from participants should also be sent through.
2. If there are issues in the feedback provided by the participants or observations made by the Host, it is incumbent on the Parish Safeguarding Officer to record this in the Parish Issues Register and act on the issues that have arisen. All actions need to be recorded in this Issues register. A copy of this Issues Register and the Event Log is to be sent through to the Diocesan Professional Standards Officer every six (6) months.
3. Any urgent matters arising need to be raised with the Parish Priest and if these are safeguarding concerns, these need to be raised with the Diocesan Professional Standards Officer.

#### Principle 2 - Every participant is to sign a 'Consent to Participate and a Code of Conduct'

There are expectations held of those who participate online and these will be enunciated in a 'Consent to Participate and Code of Conduct' which will need to be signed<sup>7</sup>.

If participants are under 18 years of age or an adult at risk, then the parent, guardian or carer is required to consent to their attendance and ensure that the participant abides by the Code of Conduct by signing jointly with the participant the 'Consent to Participate and Code of Conduct'.

Consent and Codes of Conduct can be tailored for whether these refer to Family Groups or other target groups such as Youth Ministry and ministries involving children only.

Participants who are on a Parish Council or Finance Council are bound by their Terms of Reference. Similarly, parish staff and Parish Safeguarding Officers are bound by their Position Descriptions. Consequently, there is no requirement for them to sign a 'Consent to Participate and a Code of Conduct'. However, it is strongly advised that their Terms of Reference be reviewed to include the fact that since meetings are now online, confidential discussions should not be audible to other members of the household. A private room or headphones are recommended.

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<sup>6</sup> All current Parish Codes of Conduct need to be amended to include statements of conduct in online ministry.

<sup>7</sup> Signing can be facilitated by email or 'smart forms' so long as the participant acknowledges that they understand and abide by the Code of Conduct.



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#### Principle 3 - Treatment of personal information according to the Australian Privacy Principles

All privacy obligations are required to be complied with as per the *Privacy Act 1988* (Cth). According to the National Catholic Safeguarding Standards (NCSS<sup>8</sup>) Standard 6.4.7:

*Appropriate confidentiality is maintained with due regard for the Australian Privacy Principles and relevant legislation in relation to information sharing in the context of children and adults.*

Furthermore, NCSS 8.1 states that personnel are to mitigate risks in the online environment without compromising a child's or adult's right to privacy.

To be able to enact this, the following is required:

1. Do not allow participant's personal information (email address, full name, home address and mobile telephone number) to be accessible to others, including participants in the meeting.

Therefore, when sending out a meeting invitation to all participants, make sure that the email is sent as a blind copy (BCC) so that participants do not have the list of email addresses of all the participants.

There is an exception for those who are governed by a Terms of Reference (like a Parish Council) and employees and those who have a Position Description in the parish who work together who require access to this personal information in order to facilitate their work.

2. Personal information is to be stored securely and not shared inappropriately.

The Master list of personal information of participants is to be stored at the Parish Office. If a Host/Co-host is hosting a meeting from their home and has a copy of the personal information on their online system, the Host/Co-host will need to sign the Code of Conduct declaring adherence to privacy legislation. This is part of Principle 1.

#### Principle 4 - Clearance is required for guest speakers from the Bishop's Office

There is an existing clearance process for guest speakers, which applies to those from outside of the Diocese or those who are in the Diocese but not of the Catholic faith. Clearance is required from the Bishop's Office for these guest speakers even if they are 'attending' online.

#### Principle 5 - Adherence to ratios of screened adults to participants

If there are more than 10 people participating in an online meeting, the Host is to ensure there is a secondary person (a Co-host) who will monitor and support the Host and will need to fulfil the prerequisites stated for the Host. The Host and their Co-host need to be confident that they are able to look out for signs of risk (which will be discussed in the Preparatory session).

If the meeting has participants who are under 18 years of age, then there are to be a minimum of two screened adults as for a normal Youth group.

#### Principle 6 - Prevent external 'unauthorised' people attending online meetings

The online link is **not** to be published on a publicly available medium (social media, website, bulletins, etc.). There should be a waiting room facility to allow the host to authenticate/admit participants individually. They should block inappropriate contact.

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<sup>8</sup> Draft Version 2 of NCSS released in July 2020. Expected to be approved in November 2020.



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#### Principle 7 - Be vigilant about 'interactions' between participants

Moderate chat and comment functions. It is advisable to disable private Chat between participants. However, you can retain the ability to allow participants to send a message visible to all participants.

Be vigilant as to the interactions between participants, particularly when one is offering to help another in something. Help, per se, is an important part of the Christian life. However, if that leads to the exchange of personal details (mobile telephone numbers, email addresses etc) where the introduction was precipitated by the online session, then consideration needs to be taken as to whether one or both parties are young people under 18 or are adults at risk. This will be discussed in the Preparatory session.

There is no need to mute participants upon entry but this depends on preference.

It is advisable that the Host/Co-host remove the ability for individual participants to rename themselves during the session unless there is a good reason. First names used at meetings is preferable. It is advisable that the Host name each of the participants as first name only based on a list prepared before the session.

In addition, screen sharing by the Host and Co-host is permitted. Screen sharing should not be permitted by other participants.

Note that there are exceptions to this Principle in relation to office bearers in closed groups who work together under the governance of their Terms of Reference or Position Descriptions.

#### Principle 8 - Recordings should not be made

Unless there is a specific reason which is to be discussed with the Professional Standards Officer, recordings should not be made of the online session. The reasons for this will be explained in the Preparatory session.

#### Conclusion

Principles have been provided rather than prescriptive guidelines which supports parishes, providing them confidence to manage their ministries in the online environment into the future. However, it is the adoption of **all** eight of these principles which characterises whether a parish is adhering to the guidelines rather than the adoption of just some of them or the adoption of certain practices and documents.

Ultimately, it is about understanding 'the spirit' of these principles, so that rather than seeing this as a compliance exercise, parishes become part of the collective responsibility for safeguarding which is everyone's responsibility. Adherence to these guidelines recognises the Parish's contribution to a safe Church.