# CATHOLIC DIOCESE OF SALE

# DIOCESAN SAFEGUARDING POLICY

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## Definitions

**Adults at risk:** This is the new term for 'vulnerable adults' which is recommended by the National Catholic Safeguarding Standards Version 2 as the focus is on risk factors rather than on the individual. These are adults with diverse circumstances and experiences that increase the risk of abuse which include being elderly, having a disability, having mental illness, having cognitive impairment, having diminished capacity, being culturally and linguistically diverse, experiencing transient risks such as bereavement or relationship breakdown or having an impairment that makes it difficult for that person to protect themselves from abuse, harm, or exploitation.

**Child:** a person who is under the age of 18 years. Throughout this document, any reference to either 'child' or 'children' is a reference to a person or persons under the age of 18.

**Church personnel**: Clergy, Members of Religious congregations, Diocesan and Parish employees (or contractors) and Parish volunteers (see definition below).

**Clergy:** Bishops, Priests and Deacons

**Cyberbullying:** Bullying behaviour using digital technology including mobile phones and social media

**Grooming:** When an adult communicates with a child or adult at risk with the intention of facilitating an emotional connection in order to gain trust for the purposes of sexual abuse or exploitation. Grooming does not necessarily involve any sexual activity or even discussion of sexual activity. Signs may be paying special attention to a child or adult at risk, offering gifts or money and may be directed to those close to them including family members or carers.

**Online grooming:** Online 'grooming' is where an adult sexual predator tries to lower a person's inhibitions and will use all forms of digital technologies such as instant messaging programs, forums, and chat rooms to communicate and to gain the trust of a child and/or adult at risk,

**Parish Safeguarding Officer (PSO):** A person of high integrity appointed by the Parish to work collaboratively with the parish priest and the Diocese to ensure a safe and supportive environment for people of all ages. A Position Description can be obtained from the Diocesan Safeguarding Officer.

**Parish volunteers:** These are people who volunteer and whose Parish ministry includes:

a. Directly involving children or adults at risk. Children's ministries such as Altar Server training, Sacramental Training, RCIC and Children's Liturgy. Adult ministries including parish outreach ministries such as Soup Kitchens, Parish visitations etc.

b. Leaders or coordinators. The leaders or coordinators of all Parish Ministries including all members of the Parish Finance Committee and Parish Pastoral Council.
c. Volunteers in published lists. Those listed by name in published parish rosters or bulletins/newsletters in ministries such as Special Ministers of the Eucharist, Readers, Lectors, Welcomers, Sacristans, Choir or Collectors.

**Professional Standards:** The qualities essential for the ethical and safe practices of pastoral ministry.
**Safeguarding:** Measures to protect the health, well-being and human rights of individuals, which allow people — especially children, young people and adults at risk to live free from abuse, harm and neglect. (Definition from NSPCC, UK retrieved 25 Jan 2022).
**Social media:** Websites and computer programs that allow people to communicate and share information on the Internet using a computer or mobile phone. These include blogs, podcasts, Facebook, Twitter, Instagram, YouTube and others.

## Abbreviations

| | |
|---|---|
| ACBC | Australian Catholic Bishops Conference |
| ACSL | Australian Catholic Safeguarding Limited |
| CDS | Catholic Diocese of Sale |
| CRA | Catholic Religious Australia |
| CEO Sale | Catholic Education Office Sale |
| CPSL | Catholic Professional Standards Limited (replaced by ACSL in 2021) |
| DSO | Diocesan Safeguarding Office or Officer |
| DOSCEL | Diocese of Sale Catholic Education Limited |
| NCSS | National Catholic Safeguarding Standards |
| PSC | Professional Standards Committee |
| PSO | Parish Safeguarding Officer |
| WWCC | Working with Children Check |

## History of Updates to Policy

| Name given for this Policy | Doc No | Version | Description |
|---|---|---|---|
| Child Safety Policy on the Care, Protection and Safety of Children and Vulnerable Adults | 30 | | Original Policy - Approved by the Professional Standards Committee, Nov 2016 |
| Diocesan Safeguarding Policy | 36 | Draft | Overhauled/re-written Policy: submitted to PSC September 2022 |
| Diocesan Safeguarding Policy | 43 | 1.0 | Completed and approved by PSC 6.12.2023. Released 9.2.2024. Date of next review – 9.2.2025 |

# 1. INTRODUCTION

## 1.1 Commitment

The Catholic Diocese of Sale (CDS) is committed to a safe and nurturing culture for all people in our Church. Our commitment is drawn from the heart of the Gospel, where inherent in the teaching and mission of Jesus Christ, is love, justice and the sanctity of each human person. The CDS has adopted *Integrity in our Common Mission* as part of our ongoing commitment to put safety at the centre of mission. The CDS Statement of Commitment encapsulates our ongoing commitment to creating safe environments for all those who engage with Church personnel and our Parishes.

We are committed to the practices of:

- Safeguarding: measures to protect the health, well-being and human rights of individuals, which allow people — especially children, young people and adults at risk to live free from abuse, harm and neglect.
- Professional Standards: the qualities essential for ethical and safe practices for all work and engagement within the Diocese.

## 1.2 Changing context in which safeguarding operates

The original Safeguarding Policy that the Diocese released in 2016 (known as the Child Safe Policy) has now been replaced by this Policy. This new Policy incorporates the evolving context for safeguarding and professional standards following the Royal Commission into Institutional Responses to Sexual Abuse which occurred from 2013 to 2017. The release of the Final Royal Commission Report in 2017 has resulted in a plethora of initiatives at the national, state and by the Catholic Church in Australia.

## 1.3 Purpose and Structure of the Safeguarding Policy ("the Policy")

This Diocesan Safeguarding Policy ("the Policy") is the overarching governance document or control framework across all safeguarding objectives in the Diocese. Integrity in our Common Mission the national code for the Catholic Dioceses in Australia underpins the Policy, consisting of three interdependent principles – culture,

relationships, and formation. In addition, the Safeguarding Policy seeks to balance confidentiality, transparency and accountability.

Safeguarding in the CDS is embedded into the Diocese's leadership, governance and culture. It aims to arrive at a transformed safeguarding culture throughout the Diocese, working as one Church.

This involves educating, advising and fostering cultural change throughout the Church. The work with parishes and the various ministries is often creative and responsive, reflecting the diversity of ministries, and acknowledging the importance of cultural competence in this work.

The approach taken in creating and maintaining safe environments set out in this Policy is directly aligned to the framework of the CDS Strategic Plan ("the Plan") for Safeguarding Children and Adults at Risk.

The Plan has four components consisting of Safe People, Safe Practices, Safe Places and Safe Data. The centre of the Plan is Safe People who are supported and informed by Safe Practices, Safe Places and Safe Data.

1. **Safe People** is about changing culture through training, skills and staffing.
   Training both face to face and online is aimed at changing the overall culture around safeguarding and developing awareness of inappropriate behaviour and understanding the signs of abuse. It also includes training on how to respond to and report abuse.

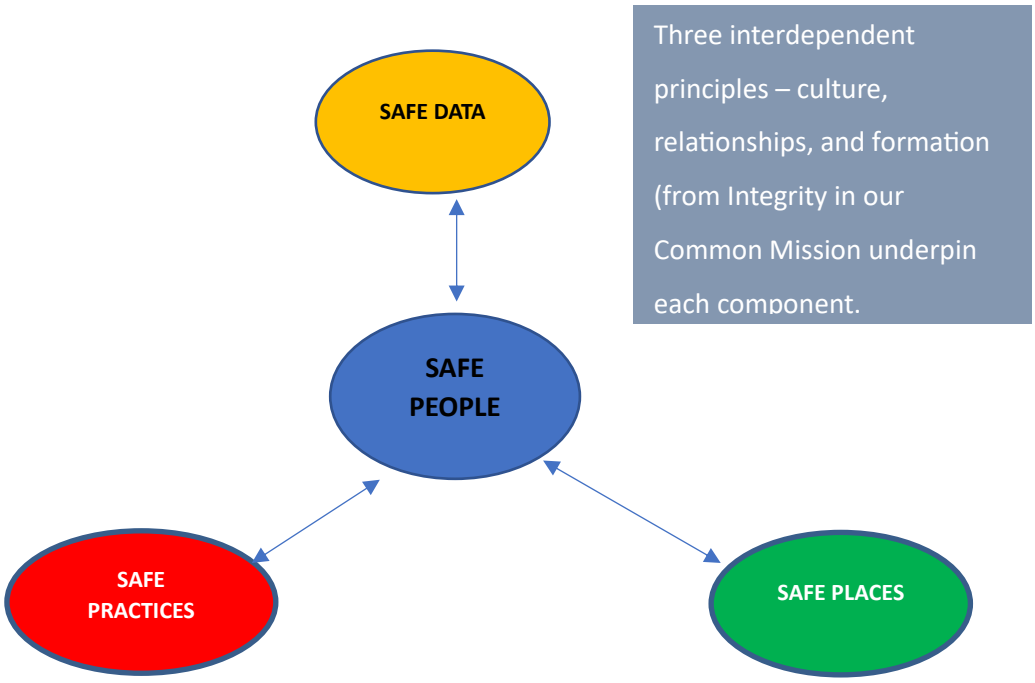
2. **Safe Practices** is about policies, practice and the operational model.
   It includes prevention strategies such as Codes of Conduct, Risk assessments, Guidelines, Policies and Procedures, of which this document is part.

3. **Safe Places** is about managing risks.
   It includes Guidelines in managing risks in the physical locations of Church, parish ministry and in the online environment.

4. **Safe Data and Information** is about information management.
   It includes the provision of robust, secure and confidential management of information which supports the reporting of abuse in all its forms, be it recording concerns, observations, allegations, formal complaints and any other matters.

Each parish within the CDS will have its own Parish Safeguarding Policy which will reference the Policy (see Appendix 2). Each Parish is unique and has specific ministries and activities that may not apply to other parishes.

**Structure of the CDS Strategic Plan (which this Policy is aligned to)**




## 1.4 Audience

The primary target audience for this Policy are Church personnel across the CDS. However, this Policy has been written for any entity or person interested in how the Diocese responds to and complies with legislative requirements, strategies and frameworks which apply both nationally and at a state level.

Church personnel are expected to be familiar with, and comply with the contents of, and support this policy and guidance through their attitudes and practice.

Church personnel are made up of:

- Clergy
- Religious brothers and sisters
- Diocesan employees

- Parish employees
- Parish safeguarding officers
- Parish volunteers. (This is a mixed group of people. Please refer to the Definition on page 3).
- Contractors engaged by the CDS.

## 1.5 Difference between Safeguarding Policy and the Safeguarding Handbook

To assist Church personnel to implement this Policy practically to their specific circumstances, a Safeguarding Handbook has been produced, primarily as an instruction manual for Parish Safeguarding Officers (PSOs). It sets out detailed requirements for safeguarding in parishes as carried out by PSOs.

The Policy addresses 'what to do' and 'why' the Diocese has set out specific rules on how ministry occurs. This is distinct from that of the Safeguarding Handbook which addresses how to implement the Policy i.e., it is a 'how to do' and 'when to do' document.

For further detail and guidance, please refer to the CDS Safeguarding Handbook.

## 1.6 National Catholic Safeguarding Standards

The publication of the first edition of the National Catholic Safeguarding Standards (NCSS) in 2019 was a significant milestone for the Catholic Church in Australia. It provides a framework which guides safeguarding in our Diocese and demonstrate compliance with Church Standards.

This Policy has been written to address NCSS Edition Two which includes adults at risk, which was approved by ACBC and CRA on 6th December 2022.

In summary, there are ten NCSS standards which have been carefully aligned with the recommendations of the RC Final Report. This incorporates changes in a number of areas including the wider national context, the Australian

Government's National Strategy to Prevent and Respond to Child Sexual Abuse (2021-2030) and new Safeguarding Canon law changes released in 2021.

The work in specifying the standards is the responsibility of the Australian Catholic Safeguarding Limited (ACSL). The NCSS provides the target framework that the Diocese will need to work to and demonstrate compliance to interested parties. Therefore, this Policy has been developed in response to NCSS.

### 1.7 Victorian Child Safe Standards (VCSS)

The revised Victorian Child Safe Standards (VCSS) came into effect in Victoria on 1 July 2022. There are 11 standards which came into effect in Victoria.

The VCSS and the NCSS have been aligned and addresses all the required legislation.

## 2. SAFE PEOPLE

**Safe People** is about changing culture through training, skills and staffing. Inculcating a culture of safeguarding is realised by lifelong formation through relevant education, training and development. It also includes professional / pastoral supervision.

Critically, Safe People requires to be supported by Safe Practices (refer to section 3), Safe Places (refer to section 4) and Safe Data (refer to section 5) in order to be realised.

These include the practice of robust screening processes for all Church personnel, continual review of these practices and ensuring ongoing engagement with codes of conduct.

### 2.1 Lifelong Formation in Safeguarding for all Church personnel

The Diocese of Sale is committed to ensuring all Church personnel are equipped with the knowledge, skills and awareness to keep children and adults at risk safe, through ongoing education and training.

The training, education and professional development needs of all Church personnel are documented in the CDS Training Strategy (available on request from the Diocesan Safeguarding Office, DSO).

Not everyone has the same formation needs. Professional development will be commensurate to the role that is being performed, skills required and the role/ level of responsibility of the individual.

Safeguarding professional development will be provided in a number of ways: face to face in large groups at the parish or Diocese level, provided by the DSO or by appointed contractors, as well as those conducted in smaller groups at the parish level by Parish Safeguarding Officers (PSOs). In addition, there is an online module offered which is specifically tailored for the CDS known as the *Safeguarding Children module* (Safetrac platform) in which all Church personnel are strongly encouraged to undertake as a minimum requirement.

All Church personnel are required to undertake the following:
i) *induction training* when they first are identified as requiring training:

- Newly arrived international clergy and newly ordained clergy and religious are required to (i) attend specific induction known as 'Integrity in our Common Mission, Parts 1 and 2', and (ii) undertake Victorian Mandatory Reporting training.
- Newly appointed church personnel and in particular volunteers are required to undertake the *online Safeguarding Children module*. Refer to above re Safetrac.

ii) *annual refresher* training*:*

- Face to face training, either conducted by the DSO, appointed contractors, and / or the respective PSO
- The DSO may design and develop training material for PSOs to deliver:
    - to their volunteers to foster a culture of safeguarding of children, young people and adults at risk.
    - to targeted leaders of Parish ministries, to foster a culture of safeguarding adults at risk.

Workshops with leaders of youth ministries and those who work with children are provided to upskill them in safeguarding and risks, including the online environment.

Formal induction training will include:

- Professional Standards Safeguarding Policy (including Code of Conduct), and
- Statutory reporting obligations.
- Basic safeguarding awareness, including information about child development and developmental needs, how to recognise safeguarding risks, signs of harm and abuse in children and adults at risk, and Grooming and Grooming Behaviours.
- How to respond to allegations, disclosures or concerns.
- Knowledge and skills on responding in culturally appropriate ways to children who disclose or show signs that they are experiencing harm or abuse. Training includes identifying culturally appropriate pathways to respond to concerns, disclosures or allegations.

## 2.2 Screening and monitoring of movement

All church personnel are required have a current Working with Children Check (WWCC):

- All clergy and religious are registered with the Australian Catholic Ministry Register and will have the associated WWCC and other references to be on this Register.
- All employees and volunteers who participate in any church ministry are required to have a WWCC as per the blanket policy of the Diocese enunciated in the WWCC Protocol.

Participants in parish ministries who are not required to have a WWCC:

- Youth who have just turned 18 years of age who are participants in youth ministry are not required to have a WWCC unless they are appointed as supervisors or facilitators.

Clergy and religious are required to be registered on the Australian Catholic Ministry Register (ACMR), which is managed by ACSL. There is a documented process to be adhered to in the movement of clergy from one Church jurisdiction to another if the person does not have an AMCR number.

## 2.3 Engagement with Codes of Conduct

The Code of Conduct outlines behaviours that maintain physical, sexual, emotional and psychological boundaries applicable to participation in ministry. Details of CDS Codes of Conduct can be found under **3.5 Safe Practices.**

All church personnel are required to abide by and sign a Code of Conduct, which is to be renewed every three years:

- Chancery staff are required to sign a Diocesan Code of Conduct
- Church personnel associated with parishes are required to sign a parish Code of Conduct.

Youth attending ministry events may be required to also sign a Code of Conduct appropriate to the circumstances of their youth group. These are found on the on the Diocesan website under Safeguarding Resources.

## 2.4 Governance Oversight of 'The L.A.M.P.' activities

'The L.A.M.P.' Youth Ministry is a loose coalition of five parishes in the Western Region of the Catholic Diocese of Sale consisting of Clyde North, Berwick, Narre Warren, Cranbourne and Pakenham[1]. Each parish takes it in turns to hold 'The L.A.M.P.' event in their parish which is open to all youth across the other parishes and potentially outside of these parishes (which may be from outside of the Diocese of Sale).

In order to reduce safeguarding risks in relation to conducting this event, 'The L.A.M.P.' Safeguarding Committee (TLSC) has been established by the Professional Standards Committee within the Diocese of Sale to provide governance and oversight across the activities of 'The L.A.M.P' Youth Ministry[2].

[1] The name 'The LAMP' has come about by a combination of the letters of their parish names: The – THE [St Thomas the Apostle, Clyde North]; L [Our Lady Help of Christians, Narre Warren], A [St Agatha's Cranbourne]; M [St Michael's, Berwick]; P [St Patrick's, Pakenham].

2 As of the writing of this Policy, this TLSC has yet to formally meet, as there have not been an L.A.M.P. events scheduled since March 2020 (due to COVID).

## 2.5 Expanding the scope of safeguarding to include Family Violence and Elder Abuse

Although safeguarding in the CDS was originally confined to sexual abuse of children and more recently extended to adults at risk, there are other forms of abuse which potentially comes under the scope of safeguarding as these broadly can be grouped as affecting 'adults at risk'.

In recent years, there have been three Royal Commissions being conducted which includes that of Aged Care, Family Violence and Veteran Suicide.

**Royal Commission into Family Violence**

Australia's first Royal Commission into Family Violence released their report in 2015 which made 227 recommendations. Recommendation No. 165 applies to Faith communities.

*Recommendation 165*
Faith leaders and communities establish processes for examining the ways in which they currently respond to family violence in their communities and whether any of their practices operate as deterrents to the prevention or reporting of, or recovery from, family violence or are used by perpetrators to excuse or condone abusive behaviour.

*Elder abuse*

The Royal Commission into Family Violence recognised elder abuse as a form of family violence featuring the unique dynamics between the older person and a family member such as an adult child. It can also present as short or long-term intimate partner violence, carer abuse or stress and long-standing family conflict. The focus for safeguarding for the CDS would be informed by the subsequent versions of the NCSS which is expected to address this.

**Royal Commission into Veteran Suicide**

The Final Report will not be released till 2024. The focus for safeguarding for the CDS would be informed by the subsequent versions of the NCSS which is expected to include this.

## Expanding scope

The scope of safeguarding could further be expanded to include appropriate behaviours in relation to the Change or Suppression (Conversion) Practices Prohibition Act 2021. Material has been gained by the DSO to provide training of clergy and volunteers if this is requested.

## 3. SAFE PRACTICES

**Safe Practices** embeds effective safeguarding policies and practices at all levels of governance and leadership in the Diocese and Parishes. **Safe Practices** include the implementation of Codes of Conduct, the use of Risk assessments, Risk and Issue Registers and highly responsive reporting of complaints, actions, behaviours.

A key principle that underpins all practices is that of balancing confidentiality, transparency and accountability.

**Safe Practices** ensures that:

- Policies and guidelines in relation to a ministry are adhered to
- safeguarding resources are easily available to all Church personnel.
- all Church personnel clarify personal and professional relationships and maintain physical, sexual, emotional and psychological boundaries applicable to their role and report any boundary violations.

### 3.1 Safeguarding Commitment Statement(s)

The CDS will embed Integrity in our Common Mission[3], into the policies, guidelines and resources related to safeguarding. The CDS has published a Safeguarding Commitment Statement which is available on the Diocese website.

### 3.2 Safeguarding Pledge

The CDS has produced a Safeguarding Pledge which is designed for volunteers to make a formal commitment to safeguarding. All volunteers are encouraged to re-commit to the Safeguarding Pledge periodically.

### 3.3 Governance involved in championing a safeguarding culture

The Diocese has championed a safeguarding culture from the top down, which at its highest level involves the Professional Standards Committee (PSC).[4]

[3] The Safeguarding commitment statement of the Australian Catholic Church, produced by ACSL.
[4] The Terms of Reference are available on application.

The PSC has been established by the Bishop as an advisory body which oversees and monitors policies, procedures and practices which safeguard children and adults at risk to ensure safeguarding functions are embedded in the governance structures and practices of the Diocese including DOSCEL.

As such all documents that constitute **Safe Practices** are subject to approval by the CDS Professional Standards Committee with most being publicly available on the Diocesan safeguarding website.

At the next level down, the Diocese has a dedicated Diocesan Safeguarding Officer (DSO) whose objective is to be a central point of safeguarding in the Diocese through the formulation and implementation of the Diocesan Strategic Plan for Safeguarding, which impacts the governance, practices and behaviours across the Diocese and Parishes.

At the Parish level, there are dedicated Parish Safeguarding Officer(s) (PSO) whose duties include (and not limited to):

- Working collaboratively with the Parish Priest/Administrators and the Diocese of Sale to implement safeguarding practices in accordance with the National Catholic Safeguarding Standards and state and federal legislation.
- Promote the policies and procedures for safeguarding children, young people and adults at risk.

Furthermore, at the Parish level, the Parish Finance and Pastoral Councils have a standing agenda item on safeguarding and have been provided with professional development to support safeguarding in the Parish.

All volunteers at the Parish level participate in a safeguarding induction and are expected to enrol in annual safeguarding refresher training to promulgate safeguarding as everyone's responsibility.

## 3.4 Governance documents

The following governance documents (policies, strategies, guidelines, protocols) have been produced to specifically address safeguarding in the CDS. These can be accessed from the Diocesan safeguarding website.

**Policies**
The following Policies have been produced:

- Complaints Handling and Reporting
- Parish Policy (standard template for parishes)
- Screening and Sign in
- Social Media and Websites
- Volunteers.

**Guidelines**
The following guidelines have been produced:

- Ministry for Children and Youth
- Parish Ministry online
- Risk Management in Parishes.

**Protocols**
The following protocol has been produced:

- WWCC Protocol.

## 3.5 Codes of Conduct

The Code of Conduct applies to all Church personnel and provides guidance on expected standards of behaviour. These standards are applicable to interactions with both children and adults.

The Diocese currently has 5 types of Code of Conduct:

- Code of Conduct applicable to Chancery staff
- Code of Conduct for Church personnel who participate in ministry at the Parish level
- Code of Conduct for those adults who facilitate youth ministry
- Code of Conduct for children who participate in youth ministry events
- Code of Conduct for all those who participate in online meetings / ministry.

Codes of Conduct are to be reviewed every three years. All Church personnel are required to recommit (abide by and sign) to the Code of Conduct every three years, irrespective of whether there has been any change to the Code of Conduct.

For families and children / youth, it is written in an accessible language. The Code incorporates the needs of children and families with a particular attention to Aboriginal and

Torres Strait Islander children, children with a disability, children from culturally and linguistically diverse backgrounds.

## 3.6 Resources

The following principles underpin the production of resources. Materials are to be:

- Accessible
- Inclusive
- Responsive to diverse needs, and
- In a format suitable for the audience.

For example, materials for children are written in a child-friendly format which promotes inclusion and informs children of their rights and provide them information on for example, how to make complaints.

The following resources have been produced by the DSO, which supports the strategies, policies and guidelines:

- Online safeguarding module – 'Safeguarding children' – via Safetrac
- Safeguarding Handbook (directed towards Parish Safeguarding Officers)
- Training material for face-to-face training on safeguarding – to be used by both the DSO and the PSOs.
- Posters (covering a range of areas including information on how to report)
- Videos (to support training of church personnel and parents/carers)
- Factsheets customised for different audiences – for both volunteers, families, children and adults at risk (to support training of safe people in the parishes).

## 3.7 Encounter and engagement with Children and Adults at Risk

The following principles underpin all practices that encounter and engage children and adults at risk:

- Pro-active engagement – they are consulted with respect to decisions that affect them. Processes are in place to engage families, carers and communities to obtain their views on policies and practices to keep children and adults at risk safe.
- They are made aware of their rights – they are informed about their right to be safe and how to inform and make known any concerns about their safety and the safety of their peers.

**Practices**

PSOs work actively in their parishes with those who lead children's ministries and other groups involving adults at risk. This includes ensuring that leaders and those who engage with children and adults at risk make safeguarding, and the principles that underpin these, central to their interactions.

The Child Safety Week initiative between the Diocese and DOSCEL provides an opportunity to encourage children to express what makes them safe and to be informed about safety. This is facilitated via a competition of drawings that invites children to express what makes them safe.

Resources provided by the DSO include age-appropriate information about safe and respectful relationships including through social media. Examples include Perth Archdiocese Safeguarding children's storybook,' *God gave Elizabeth Grace the Right to Feel Safe'*.

## 3.8 Diocesan Safeguarding Training Strategy

The Diocesan Safeguarding Training Strategy can be obtained directly from the DSO. It identifies seventeen different groups that require targeted safeguarding training. These include:

- Parish Safeguarding Officers – induction and ongoing refresher training.
- Clergy – those international clergy who have newly arrived or are newly ordained versus refresher training for those who have been in the Diocese for more than three years.
- Parish volunteers – both newly inducted and those who have been in the role for some time.
- Children – different age groups – under 9, 9 – 13 and over 13 – 17 years of age.
- Adults at risk – different cohorts.
- Families and carers of children – this includes encouraging families and carers to take an active role in monitoring safety when participating in activities. The focus is to conduct open dialogue through sessions designed to inform and support them to safeguard their children.

### 3.9 Recruitment of Church Personnel

Whether church personnel are employed or volunteers, there is a requirement to ensure that when they are recruited that:

- They have a WWCC, sign the code of conduct and undergo any other relevant screening. There is a WWCC protocol which is applicable across the Diocese for all church personnel.
- They are inducted into safeguarding via undertaking both the online safeguarding module and attending face to face training, as required.

If a volunteer does not renew or have a current WWCC, it is CDS policy that they are **not permitted to participate as a volunteer in any capacity in the parish**.

With respect to the Department of Justice (DOJ) system that administers the WWCC, it is important that WWCC details should only be recorded officially once the correspondence has arrived from the DOJ linking the volunteer to the respective parish.

Ongoing review of the currency, validity, sufficiency and completeness of WWCC is required of volunteers and staff. In order to ensure the ongoing validity of the WWCC, it is necessary practice for the parish to validate the WWCC of each volunteer with the DOJ every six months. This poses a challenge, not least when volunteers move from the parish and the PSO is not informed of this or if people choose no longer to volunteer and the PSO is not aware of this.

See **Safe Data** for details about record-keeping involved with these matters.

### 3.10 Ministries in the parish need to be registered with the Bishop's Office

It is required for Parishes to inform the Bishop's Office of new ministries and prayer groups being established in their Parish. These ministries are not permitted to be advertised in the parish bulletin without first notifying the Parish Priest and the Bishop's Office.

### 3.11 Annual performance reviews and professional / pastoral supervision

All clergy and religious in active ministry are required to undertake at least six hours of professional / pastoral supervision per year. All newly ordained clergy and newly professed religious are supported with a suitable mentor for at least five years post ordination or final profession.

### 3.12 Practice of continuous improvement

The DSO ensures that compliance of parishes with the National Catholic Safeguarding Standards is conducted annually. All parishes via their PSOs are expected to complete and update 'Potential Parish Audit Areas' (former CPSL audit document) and submit this to the DSO.

In addition, the DSO conducts systematic visits to parishes to ensure that safeguarding practices are being conducted. 'Internal audits' of parishes are conducted bi-annually either face to face by a visit or online audit by the DSO.

In addition, all parishes are required to submit the following artefacts annually to the DSO:

- WWCC records
- Volunteer register showing (i) the status (date of attendance) of training for each volunteer and (ii) codes of conduct being acknowledged and signed
- Risk Register
- Issue Register
- Risk assessments of particular activities.

## 4. SAFE PLACES

The focus of 'Safe Places' is to ensure safety in both the physical and the online environments so that potential risks of harm to both children and adults are mitigated[5].

### 4.1 Mitigating risks in the physical environment

In accordance with the National Catholic Safeguarding Standards (NCSS) and the Victorian Child Safe Standards, the Diocese of Sale is committed to identifying and assessing risks in the Diocese and Parish context and putting into place controls to mitigate these risks. Guidelines have been produced to assist in identifying risks and their management in the physical space of the Parish.

The Guidelines lists procedures to follow, particularly for Parish Safeguarding Officers (PSOs) who will use this to liaise with Church Personnel including the Parish Priest and Parish Council. Ongoing support and training are provided to PSOs to undertake these activities.

Potential risks, identified together with proposed mitigation actions, are addressed in the areas of:

- Leadership, Administration and Parish volunteers
- Altar servers
- Children in the Church environment
- Children's Liturgy, Sacrament Preparation/Catechises, Children's Youth Group
- Toilets / Change rooms
- Sacraments – Baptisms, Holy Communion, Confirmation, Weddings. Other Church events such as Funerals
- Parish Events/Community celebrations/Working bees/Parish Fete
- Visiting parishioners in their homes
- Third party users of parish premises - see 4.2.

[5] Mitigation is a general term for responses to risks which include: reducing the impact or the probability of the risk; seeking a fallback or contingency plan; transferring the risk to a third party via insurance; sharing the risk or accepting the risk by doing nothing.

All Parishes are expected to populate their Risk Registers for risks that they have identified, together with the mitigation actions and timelines to review these same risks periodically to determine how well the risk is being managed. Risk Registers are sent annually to the DSO.

In addition, all parish events and activities are required to undertake a Risk Assessment which is carried out by the Parish Safeguarding Officer. All risk assessments are sent through to the DSO for review and sign off before the actual scheduled event.

### 4.2 Third party contract agreements

A template has been drawn up to be used with third parties that use or hire out parish premises. This includes:

- The requirement to conduct due diligence
- Risk assessments (conducted by the Parish Safeguarding Officer and/or Parish Council) of the third parties' compliance with the CDS safeguarding practices.

### 4.3 Mitigating risks in the online environment

The impact of COVID-19 and the limitation placed on physical attendance has resulted in a number of parish ministries being conducted online. Any ministry which involves interaction and communication in the online environment will have the requirement to acknowledge required behaviours through the signing of the respective Code of Conduct. This applies to participating youth, adults at risk and their respective leaders and facilitators.

The Diocese has produced two documents to address risks in ministry in the online environment:

- Guidelines for Parish Ministry Online
    - This is a Principles based document.
- Policy on Social Media and Websites.
    1. This includes ensuring that the selected social media tool fits the purpose for which it is required.
    2. That approval is to be obtained first from the Parish Priest and then the Diocesan Business Manager for the creation of official social media accounts.

3. That an Agreement must be drawn up between the Parish Priest and Church personnel wanting to set up the social media facility.
4. Prior to any interaction on the platform occurring, there needs to be endorsement by the Business Manager that the Agreement has been made with the Parish Priest.
5. Church personnel wanting to set up the social media facility will be required to attend appropriate training before they can be authorised to manage official social media sites.

### 4.4 Implementation of Codes of Conduct supports the mitigation of risks

The practice of abiding by and implementing Codes of Conduct enable expected behaviours and communication protocols to be made explicit and provides direct guidance of safeguarding and addresses power imbalances in relationships for all Church personnel. In this way, risks in both the physical and the online environment are mitigated.

### 4.5 IT Systems and Practice

At the Diocesan level, blocking and filtering of inappropriate online activity is in place for Diocesan networked computers / devices.

Work is being conducted to ensure that this is also instituted at the parish level and needs to be implemented.

## 5. SAFE DATA

**Safe Data** is about information management. It includes the provision of robust, secure and confidential management of information which supports the reporting of abuse in all its forms, be it recording concerns, observations, allegations, formal complaints and any other matters.

It also provides the facility to store and easily retrieve accurate records of ministry across the CDS in relation to any enquiry or investigation in relation to **Safe People, Safe Practices** and **Safe Places**.

### 5.1 Information sharing and record keeping policy

The Diocese is working on an information sharing and record keeping policy and procedure, for the future.

### 5.2 Storage and retrieval of records

The Royal Commission[6] has recommended that all records are saved for at least 50 years.

Currently, the DSO obtains the following from parishes on annual basis. These are stored on the Diocesan server. This practice ensures that records from all parishes are saved in perpetuity as per the Royal Commission recommendations and is not dependent on the different systems and changes to systems that occur in parishes.

**The following annual records are obtained from Parishes:**

- WWCC records
- Risk registers
- Issue registers (which contain individual incidents and complaints)
- Risk assessments.

**The following annual records obtained from the Bishop's Office in relation to clergy:**

- Professional / Pastoral supervision of clergy and religious
- Ongoing professional development
- Annual performance appraisals for Chancery staff only

[6] 2013 – 2017 Royal Commission into Institutional Responses to Child Sexual Abuse

- Evidence that newly ordained and newly professed religious are supported by a suitable mentor.

## 5.3 Systems in place to regularly review and improve

The CDS has a clearly documented Safeguarding Implementation Plan which outlines monitoring and continual improvement of practices.
The annual retrieval of records from parishes is part of an annual assurance across the CDS to record information/ records of parish activities and data that may have a cumulative risk across the parishes in the Diocese. It also alerts the Diocese of interventions that need to occur and where the DSO needs to 'step in' to support parishes.

Procedures are in place by the DSO to analyse issues with respect to the data. Issues are a general term for:

- Individual incidents
- Complaints
- Systemic patterns.

The outcome(s) from the analysis then generates initiatives that would improve the effectiveness of safeguarding in the CDS. These initiatives would be implemented in a timeframe that suits the severity of the issue. Non-urgent yet important issues are addressed by initiatives that are documented in the subsequent Diocesan Safeguarding Strategic Plan for the following year.

## 6. CONCLUSION

This Policy seeks to support the CDS to achieve its commitment to safety and to demonstrate that the Diocese has placed safety at the centre of mission.

This Policy enables the CDS to successfully address the NCSS standards and the ensuing audit requirements of the ACSL.

APPENDIX 1 – Parish Policy template

- Introduction
  - *Purpose, Introduction, Context*
  - *Legislation, Parishioners, Parish staff, Volunteers, Children and Adults at risk*
  - *A Culture of Safeguarding for ALL*
    - *Establishing a culturally safe environment in which diverse and unique identities, experiences and backgrounds are respected*
  - *Safeguarding relationships where there may be power imbalances – Positive Relationships*
  - *Lifelong Formation*
- Parish Safeguarding responsibilities
  - *Parish Safeguarding Officers*
  - *Parish Priest and Assistant Priest*
  - *Parish Office*
  - *Parish Leadership - PPC – Terms of Reference*
  - *Parish Leadership - Parish Finance Council – requirement to have Safeguarding on agenda with a focus on risks (which if they occurred would cause financial consequences)*
  - *Parish Ministries*
- Guidelines for Church Personnel
  - *WWCC*
  - *Safeguarding Induction*
  - *Ongoing Training*
  - *Police checks for visitors to aged care homes and home visits*
- Code of Conduct
- Risks in the Parish setting (both physical and online)
  - *Risks that may occur - Safeguarding physical safety - Separate changing areas – clergy and altar servers*
  - *Risks that may occur - Safeguarding online safety -Filming and use of permission forms for images (photographs). Adherence to Guidelines to Parish Meeting ministry online*
  - *Risk Register*
  - *Risk Assessment of Parish activities – all parish events to have risk assessments, even if there are no safeguarding risks.*
- Issues (observations, concerns, complaints, any other?)
  - *Issue Register*
  - *Reporting to Authorities*

Online presence of the Parish

- *Diocesan Social Media and Website Policy*

Conducting Ministry Online

- *Grooming risks*
- *Livestreaming*

Information Sharing and Privacy Policy

- *Handling of Parishioner details – avoiding the risk of personal information being provided to a third party*
- *Commitment to safeguarding sensitive data*
- *Online activity*

Third Parties who use the Church – Third Parties Facilities User Agreement

Altar servers

Ministries involving children and youth

- *Guidelines for Children and Youth*
- *Code(s) of Conduct for different age cohorts*
- *Transitioning young people beyond the age of 17*
- *Listening to their Voices and involving them in decision-making (where applicable)*
- *Choirs with children*

Ministries involving adults at risk

- *Visits to homes – maximum of only three visits individually or visit in pairs*

High Risk Individuals who attend the Parish (physically and online)

Records to be kept

- *WWCC*
- *List of Approved Ministers to the Sick and at home*
- *Visitors to the Parish (including Contractors)*
- *Permission forms*

Approved by PSC 6.12.2023

Effective from 9.2.2024