# Archdiocese of Brisbane

Safeguarding Children and Vulnerable Adults
Prevention and Protection Policy

## Implementation and Accountability Strategies



# It takes a whole community

It is hard to think of a more basic and important task in the Church that the safeguarding and nurturing of children.  My own commitment to that is unequivocal, and I know that the commitment is shared by the many clergy, religious, employees and volunteers of the Archdiocese who work with children in many different ways.

This Safeguarding Children and Vulnerable Adults Policy is an important step in the right direction at a time when we need to change not only policies and procedures in the Church but even our culture which has failed in the past.  What you find here replaces our previous policy, and it seeks to prescribe best practice in preventing harm and ensuring that the young and vulnerable are able to flourish.  I wholeheartedly commend the policy to you.

The Code of Ethical Behaviour for employees and volunteers who work in service of the Church is an important part of this policy.  It makes clear the responsibility to report incidents should abuse of any kind be disclosed at any time.  It also leaves no doubt that training for implementation of the policy and regular auditing for compliance are essential.  I would ask each of you to accept responsibility on these points.

Many thanks for all you do in service of the Lord Jesus and his Church in the Archdiocese of Brisbane.  May the God of all mercy bless you and those entrusted to your care, especially the young and the vulnerable.

Archbishop of Brisbane

17 March 2017

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Materials developed by the National Board for Safeguarding Children in the Catholic Church, Ireland: *Safeguarding Children* and the Diocese of Austin: *Ethics and Integrity in Ministry* have been used with permission in this document.  The Archdiocese of Brisbane is deeply grateful for the generosity of these colleagues.

*Working with Children (Risk Management and Screening) Act 2000 (QLD)* requires that businesses, in our case parishes, have a Child and Youth Risk Management strategy.

Nothing in the policy affects the expectations of *Integrity in Ministry – a document of principles and standards for Catholic Clergy & Religious in Australia. (June 2004).*

## SCOPE

For consistency throughout the Archdiocese, in the approach to safeguarding children and vulnerable adults, the policy statement applies as follows to Clergy and Archdiocesan workers of:

- Parishes throughout the Archdiocese of Brisbane
- Episcopal Offices
- Financial Administrator's Office
- Clergy Support
- Archdiocesan Services (ADS)
- Archdiocesan Development Fund (ADF)
- Brisbane Catholic Education
- Centacare
- Evangelisation Brisbane

Centacare and Brisbane Catholic Education in addition will apply their own operational strategies in line with legislative and accreditation requirements that apply to their specific operations.

## CORE PRINCIPLES

In the implementation of the policy the Archdiocese of Brisbane is committed to the following principles:

- Children and vulnerable adults have a fundamental right to be respected, nurtured and protected from any harm;
- Recruitment, selection and induction requirements and procedures for all Archdiocesan workers will be designed to ensure unsuitable persons are excluded from appointment;
- All Archdiocesan workers will be required to commit to the Code of Ethical Behaviour which sets out clear expectations regarding behaviour;
- Appropriate education and training will be provided to all Archdiocesan workers to ensure child protection knowledge and skills are current;
- The Archdiocesan Safeguarding Officer will conduct internal monitoring and reporting on an annual cycle with each parish, to ensure policy objectives and strategies are being achieved;
- Independent external auditing of the policy objectives and strategies will be undertaken annually and the findings made public, through a report published on the Archdiocesan website and media release. The external audit cycle will see every parish externally audited within a five year period.

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The policy will be implemented in parishes using the strategies outlined below. Parish accountability will be assessed using the following twelve (12) implementation strategies.

### IMPLEMENTATION STRATEGY 1: A STATEMENT OF COMMITMENT

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| All Clergy, Religious, Archdiocesan workers are bound by the '*Safeguarding Children and Vulnerable Adults Policy'* statement:<br><br>*The Archdiocese of Brisbane holds that children and vulnerable adults are a gift from God with an intrinsic right to dignity of life, respect and security from physical and emotional harm. They are to be treasured, nurtured and protected from any harm.* | Evidence of compliance with this requirement is demonstrated by:<br><br>☐ Display of policy statement in the church, parish office, meeting rooms, hall office;<br><br>☐ Publish policy statement in the parish newsletter at least twice per year;<br><br>☐ Provide a copy of the policy statement to all new Clergy, Religious and Archdiocesan workers. |

### IMPLEMENTATION STRATEGY 2: A CODE OF CONDUCT

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| All Clergy and Religious are bound by and comply with *Integrity in Ministry*, the code of conduct established by the National Committee for Professional Standards.<br><br>At induction, all Archdiocesan workers are made aware of and are bound by the Archdiocesan *Code of Ethical Behaviour* and *Integrity in the Service of the Church*. | Evidence of compliance with this requirement is demonstrated by:<br><br>☐ Clergy and Religious indicate by signature that they have read and understand the requirements of *Integrity in Ministry;*<br><br>☐ Archdiocesan workers have received the Archdiocesan *Code of Ethical Behaviour;*<br><br>☐ Employees have signed their understanding of the document;<br><br>☐ Records relating to safeguarding training are kept in the parish Volunteer Register. Training includes practical examples of appropriate behaviour compared to inappropriate behaviour which is taught through scenarios. |

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| Employees are recruited through the Human Resources department of the Archdiocese.<br><br>Within six (6) months of new employees commencing they must undertake safeguarding training.<br><br>Safe recruitment and selection practices are to be implemented to assist in the recruitment and selection of volunteers including:<br>• A minimum of two (2) Referee checks;<br>• Interview with Parish Priest or delegate;<br>• Blue Card check (if required – depends on the tasks being undertaken);<br>• Police check (if required). | Evidence of compliance with this requirement is demonstrated by:<br><br>☐ Inclusion of the safeguarding recruitment statement in any advertising of positions, paid or volunteer, that involves working with children and/or vulnerable adults;<br><br>☐ Clergy adhere to roles as described in church documents: *Priest and the Parish School*, *Priest and the Parish Finance Council*, *Integrity in Ministry*;<br><br>☐ Use of specific interview questions designed to screen unsafe candidates;<br><br>☐ Minimum of two reference checks held on Archdiocesan workers' files;<br><br>☐ Existence of position descriptions for each position - employee or volunteer;<br><br>☐ Positive notice Blue Cards to be held by each employee or volunteer working with children;<br><br>☐ Police Checks are carried out for Archdiocesan workers visiting nursing homes, hospitals or private homes, e.g. extraordinary ministers of the Eucharist or Care and Concern ministry;<br><br>☐ Records of training held by HR, for employees, and held by the Parish, for its volunteers;<br><br>☐ Safeguarding training must be completed for ongoing employment to be confirmed before the end of the qualifying period (six months) for employees;<br><br>☐ Training in the mandatory reporting steps is provided to all clergy, religious, and Archdiocesan workers who have contact with children and vulnerable adults;<br><br>☐ Training to be undertaken every two years;<br><br>☐ Training undertaken for parish employees and the Local Safeguarding Representatives (LSR) in how to receive a disclosure of abuse. |
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| Clergy, Religious and Archdiocesan workers are required, by the Archdiocesan Safeguarding Children and Vulnerable Adults Policy (see Support Document), to mandatorily report incidents or suspicions of harm.  The policy's support document provides the steps in handling suspicion of harm and/or disclosure of harm.<br><br>The Archdiocesan Safeguarding Officer is available to assist with this process, as required. | Evidence of compliance with this requirement is demonstrated by:<br><br>☐   Ready access to the Safeguarding Reporting Form to record suspicion or disclosure of harm (hard or soft copy in parish office also available on the Archdiocesan website);<br><br>☐   Preparing a secure, confidential file within parish administrative procedures to retain copies of any Safeguarding Reporting Forms;<br><br>☐   Appointing a Local Safeguarding Representative who has been trained and is made known to the parish. |

IMPLEMENTATION STRATEGY 5:     A PLAN FOR MANAGING BREACHES OF SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

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| Any breach of this Safeguarding Children and Vulnerable Adults Policy by an Archdiocesan worker is to be addressed in a fair and supportive manner.<br><br>Concern for justice and healing requires full co-operation with applicable civil authorities and processes [*Integrity in Service of the Church*, p 5].<br><br>A **breach** is any action or inaction by any member of the church, including children and young people, that fails to comply with any part of *The Safeguarding Children and Vulnerable Adults Policy*.<br><br>This includes a breach in relation to:<br><br>• Statement of commitment to the safety and wellbeing of children and vulnerable adults and their protection from harm;<br><br>• The Archdiocesan Code of Ethical Behaviour for interacting with children and vulnerable adults; | Evidence of compliance with this requirement is demonstrated by:<br><br>☐   Applying natural justice to all persons involved in an alleged breach;<br><br>☐   Allowing those involved to provide their understanding of events;<br><br>☐   Making detailed notes in regards to the details of the breach and those involved. This may require completing the details on the Safeguarding Recording Form;<br><br>☐   Keeping all notes/records in an incident file and/or Archdiocesan employee's file;<br><br>☐   Maintaining confidentiality in matters related to the alleged breach;<br><br>☐   Ensuring an outcome will be provided within seven days. |

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| | Outcomes for breaches will depend upon the nature of the breach, and may include: |
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| • Procedures for recruiting, selecting, training and managing Archdiocesan workers;<br><br>• Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines;<br><br>• Risk assessment and management plans for high risk activities and special events;<br><br>• Safeguarding Agreement (Memorandum of Understanding) plan where a formerly convicted perpetrator seeks to rejoin a parish; and<br><br>• Strategies for communication and support. | ☐ Reminder re component of the Safeguarding Policy e.g. Code of Ethical Behaviour;<br><br>☐ Closer supervision;<br><br>☐ Further education/training;<br><br>☐ Mediation between those involved;<br><br>☐ Review of current policies and procedures and development of new policies and procedures;<br><br>☐ Disciplinary procedures, and report to Professional Standards Office;<br><br>☐ Notification of misconduct to police, Professional Standards Office and dismissal in the case of proof of harm having been caused;<br><br>☐ Review of risk assessments. |

IMPLEMENTATION STRATEGY 6: POLICIES AND PROCEDURES FOR COMPLIANCE WITH SCREENING REQUIREMENTS

| | Evidence of compliance with this requirement is demonstrated by: |
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| A Blue Card Register of Archdiocesan workers is kept by parishes. Expiry dates noted, re-applications made and an internal process is in place for tracking renewals.<br><br>A Police Check Register of Archdiocesan workers is kept by parishes. Expiry dates noted, re-applications made and an internal process is in place for tracking renewals. | ☐ Employee particulars, including Blue Card details entered into the Aurion HR system. This system is set to report upcoming expiry of licenses, such as Blue Cards and Police Checks;<br><br>☐ Parishes that use PACs , keep, all volunteers' particulars in PACs, including Blue Card and Police Check details. This system will report upcoming expiry of licenses, Blue Cards and Police Checks;<br><br>☐ Parishes that do not use the PACs are to keep a register of volunteers' particulars including Blue Card and Police Check details which are to be reviewed at least annually. |

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| The Parish Priest/Administrator is responsible to ensure that risk assessments are conducted on all activities involving children and vulnerable adults.  Those involved in the running of these activities are to understand the risk assessment requirements to mitigate identified hazards. | Evidence of compliance with this requirement is demonstrated by: |
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| | ☐ Consistent implementation of the Two Adult Rule; |
| | ☐ Follow best practice regarding photography of events involving children and vulnerable people as outlined in the policy; |
| | ☐ Follow best practice as outlined by the ACBC Social Networking policy https://www.catholic.org.au/world-communications-day-2015/social-networking-policy; |
| | ☐ Risk assessments completed using the Risk Calculator provided in the Resource Documents; |
| | ☐ Risk assessments are to be kept within the Work Health and Safety files and reviewed for currency on an annual basis; |
| | ☐ Special events, such as children's holiday activity programs should be risk assessed, covering all aspects of the program, including human factors. checklist available on the Archdiocesan Intranet (AI). |

IMPLEMENTATION STRATEGY 8:    OFFENDER RISK MANAGEMENT

| In keeping with the Safeguarding Policy and our Pastoral Mission, the Church will actively manage those who pose a risk to the safety of children and vulnerable adults in church communities.<br><br>Where a person is known to pose a risk, the Vicar General and the Safeguarding Officer will work with the parish to develop an appropriate Memorandum of Understanding (MOU) between the Parish Priest/Administrator and the offender. | Evidence of compliance with this requirement is demonstrated by:<br><br>☐ A Memorandum of Understanding (MOU) which keeps all parties safe;<br><br>☐ Archdiocesan leadership advising the Parish Priest/Administrator that a person posing a risk may be attending, and supporting the Parish Priest in the development of a MOU which keeps all parties safe; |

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| This agreement is required in circumstances where an individual intends worshipping within or being an active member of any Church community or setting, specifically: | ☐ Archdiocesan leadership with the Safeguarding Officer supporting the Parish Priest /Administrator to enact the MOU; |
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| • Where there are significant concerns, allegations or convictions which indicate a possible risk of harm to others; <br><br> • When a convicted sex offender or violent prisoner is released and intends to attend Church; <br><br> • Where members of the clergy or religious have been temporarily withdrawn from ministry pending conclusion of enquiries of a safeguarding matter; <br><br> • Where, post enquiry, concerns remain about a member of clergy or religious but not such that they should be dismissed; <br><br> • Where an individual is subject to any current investigation or assessment of risk for a safeguarding matter. | ☐ Archdiocesan leadership working closely with the Police/Probation Officer to implement the MOU. |

IMPLEMENTATION STRATEGY 9:    PROFESSIONAL DEVELOPMENT

| All Archdiocesan workers working with children and vulnerable adults are required to participate in regular education and training. | Evidence of compliance with this requirement is demonstrated by: <br><br> ☐    Training records that are maintained. |
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IMPLEMENTATION STRATEGY 10:    COMMUNICATION AND SUPPORT

| The Policy, Support Documents and Implementation and Accountability Strategies are communicated publicly. | Evidence of compliance with this requirement is demonstrated by: <br><br> ☐    *Archdiocesan Safeguarding Policy* is displayed in churches, parish offices, meeting rooms and parish halls; |
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| | ☐ Up-to-date copies of the Policy, Support Document and Implementation and Accountability Strategies are maintained on Archdiocesan website and intranet;<br><br>☐ Each parish has a Local Safeguarding Representative who is made known to, and offers support to the community independent of the Priest. |

IMPLEMENTATION STRATEGY 11:  MONITORING AND REPORTING

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| The implementation of the policy, strategies and actions are monitored by the Archdiocesan Safeguarding Officer and annual reports provided outlining the status of that implementation. | Evidence of compliance with this requirement is demonstrated by:<br><br>☐ The Archdiocesan website maintains data associated with the implementation of the policy, Implementation strategies and actions;<br><br>☐ A program of annual internal audits is undertaken and records kept. |

IMPLEMENTATION STRATEGY 12:  INDEPENDENT EXTERNAL AUDIT

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| The implementation of the Policy, guided by the implementation and accountability strategies, will be subject to independent external audit by an audit firm contracted for this purpose.<br><br>The audit cycle will see every parish externally audited within a ten year period. | Evidence of compliance with this requirement is demonstrated by:<br><br>☐ An independent external audit of the implementation of the policy, strategies and actions is conducted;<br><br>☐ The results of the audit are published on the Archdiocesan website and by media release. |

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## ASSOCIATED DOCUMENTS

Australian Catholic Bishops Conference and Catholic Religious, "*Towards Healing.* Principles and procedures in responding to complaints of abuse against personnel of the Catholic Church in Australia", National Committee for Professional Standards, January 2010.


Australian Catholic Bishops Conference and Catholic Religious, *Integrity in Ministry*. A document of principles and standards for Catholic Clergy and Religious in Australia, National Committee for Professional Standards, June 2004.

Australian Catholic Bishops Conference and Catholic Religious, *Integrity in the Service of the Church*. A resource document of principles and standards for lay workers in the Catholic Church in Australia, National Committee for Professional Standards, September 2011.


## LEGISLATION

*Child Protection Act (QLD) 1999*

*Child Protection Reform Amendment Bill 2014*

*Education (General Provisions) Act 2006 Privacy Law*

*Public Health Act (Qld) 2005*

*Working with Children (Risk Management and Screening) Regulation 2011*


## REFERENCES

Archdiocese of Brisbane *Privacy Policy*

Archdiocese of Brisbane Catholic Education Council *Student Protection Policy September 2011*
Carmody Report: *Taking Responsibility: A Road Map for Queensland Child Protection* (July 2013)

Child Wise http://www.childwise.org.au/

*Safeguarding Children*, Standards and guidance document for the Catholic Church in Ireland. September 2008
South Australian Catholic Church, *Child Protection Council Policy for the Care, Wellbeing and Protection of Children and Young People.*

Truth Justice and Healing Council, Child Safe Institutions *Issues Paper 3*

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