Response to Growing Child Safe Organisations in Queensland Consultation Paper

Queensland Catholic Education Commission

23 April 2021

1. The Queensland Catholic Education Commission (QCEC) welcomes the opportunity to provide comment on the *Growing Child Safe Organisations Consultation Paper* (the Consultation Paper)*.*

2. QCEC is the peak strategic body for Catholic education in Queensland. This submission is provided on behalf of five Diocesan Catholic School Authorities and 17 Religious Institutes and other incorporated bodies which, between them, operate a total of 309 Catholic schools that educate more than 156,000 students in Queensland.

PART 1: THE CHILD SAFE STANDARDS

3. Queensland Catholic schools have a strong commitment to ensuring the safety and well-being of children and young people in their care. In working to fulfil this commitment, it is recognised that the research, findings and recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse continue to play an important part in informing and guiding future actions. This includes the Ten Key Elements of Child Safe Institutions or National Principles for Child Safe Organisations (hereafter referred to collectively as the **Child Safe Standards** as per the approach of the Consultation Paper). The Child Safe Standards continue to provide important and useful direction for schools and other institutions in making sure they have in place the appropriate policy settings, systems and structures to keep children safe and minimise risks of harm.

The Catholic school context

4. As Catholic entities, all Catholic schools in Queensland (and Australia) are required to comply with the National Catholic Safeguarding Standards (the Catholic Safeguarding Standards) which are based on and align closely to the Child Safe Standards. This has been in place since 2019 and audit and other compliance activity is coordinated by the Australian Catholic Safeguarding Limited (ACSL), formerly Catholic Professional Standards Ltd (CPSL).

5. Additionally, as noted at page 8 of the Consultation Paper all Catholic schools must comply with a complex range of existing regulatory requirements including:
   a. The 'working with children check' requirements under the Blue Card System;
   b. Regulation and Accreditation under the *Education (Accreditation of Non-State Schools) Act 2017* and various other education related legislation and policy requirements;
   c. Quality Frameworks, including Child and Youth Risk Management Strategies where applicable;
   d. Legal obligations, including mandatory reporting obligations under the *Education (General Provisions) Act 2006*, the *Child Protection Act 1999* and (in the future) the Criminal Code, and existing civil legal responsibilities.

6. With respect to implementation of the Catholic Safeguarding Standards, the approach of the CPSL/ACSL for highly regulated agencies, such as Catholic schools, has been to map the Catholic Safeguarding Standards against existing accreditation and regulatory requirements. Catholic Schools have generally been able to achieve compliance with the Catholic Safeguarding Standards with significant reliance on existing accreditation and regulatory requirements.

7. The following figures compare the Catholic Safeguarding Standards to the Child Safe Standards.

Child Safe Standards	National Principles for Child Safe Organisations
1. Child safety is embedded in institutional leadership, governance and culture.	1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children participate in decisions affecting them and are taken seriously.	2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved.	3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld, and diverse needs are taken in to account.	4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children are suitable and supported.	5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints of child sexual abuse are child focused.	6. Processes to respond to complaints and concerns are child focused.
7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training.	7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments minimise the opportunity for abuse to occur.	8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the Child Safe Standards is continuously reviewed and improved.	9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the institution is child safe.	10. Policies and procedures document how the organisation is safe for children and young people.

Figure1: Child Safe Standards (page 6, *Growing Child Safe Organisations Consultation Paper*)

National Catholic Safeguarding Standards		2
Applying the Standards		4
Standard 1 Committed leadership, governance and culture	6	**Standard 6** Effective complaints management	17
Standard 2 Children are safe, informed and participate	9	**Standard 7** Ongoing education and training	20
Standard 3 Partnering with families, carers and communities	10	**Standard 8** Safe physical and online environments	22
Standard 4 Equity is promoted and diversity is respected	12	**Standard 9** Continuous improvement	24
Standard 5 Robust human resource management	13	**Standard 10** Policies and procedures support child safety	25

Figure 2: National Catholic Safeguarding Standards (see: https://www.cpsltd.org.au/safe-church/national-catholic-safeguarding-standards/)

8. Figure 3 also maps the Child and Youth Risk Management Strategy regulatory requirements under the *Working with Children (Risk Management and Screening) Act 2000* against the Child Safe Standards:
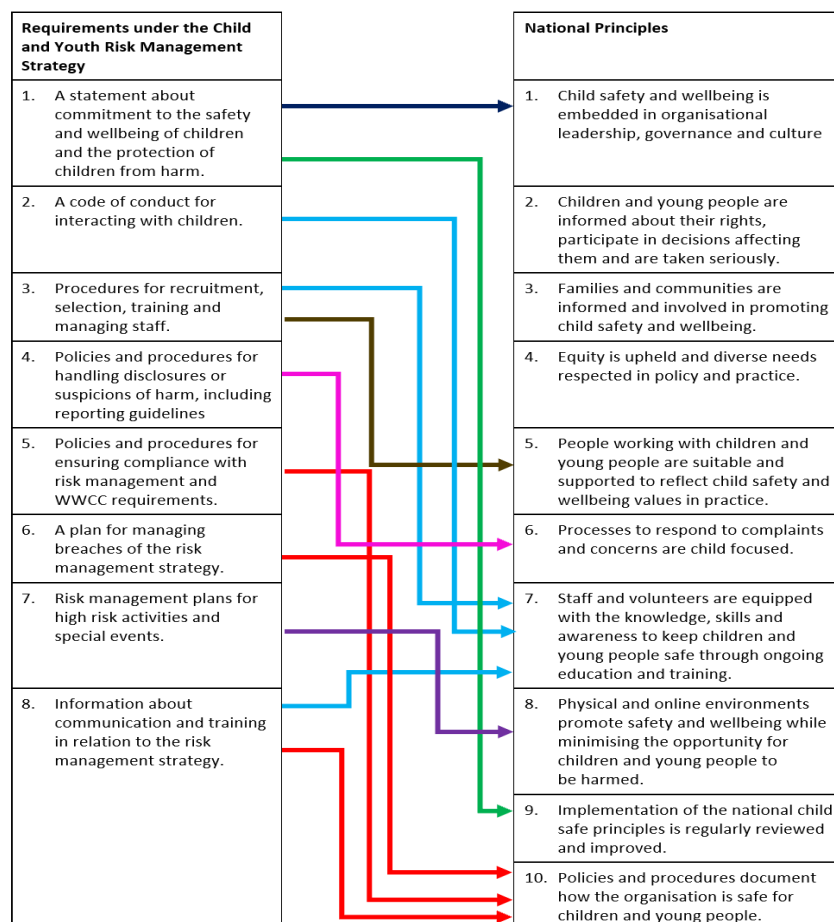

Figure 3: Child and Youth Risk Management Strategy vs Child Safe Standards

9. As a result of the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse, the Queensland Catholic Education Commission established a Royal Commission Implementation Taskforce in 2017. The work of this group culminated in the development of an implementation plan for Catholic Schools with respect to the Child Safe Standards. The table at **Annexure 1** seeks to map the requirements of the Child Safe Standards within the context of school environments. This material shows some of the steps likely to be taken by schools to comply with the Child Safe Standards (noting that some of these steps are required under existing regulatory requirements in any case). This plan was designed to assist Queensland Catholic School Authorities to map their current practice against the requirements so they could plan for changes and identify how improvements may be needed in the future.

10. The information contained in Annexure 1 shows that existing Catholic Safeguarding Standards and regulatory requirements impose on Catholic schools' compliance with many of the key aspects of the Child Safe Standards. However, the ability of schools to completely implement the Child Safe Standards will ultimately depend on the nature of the model adopted, and the nature, role, and expectations of any regulators. Catholic schools have experience and a degree of maturity with developing systems which support child safe standards within their organisations. However, they will nevertheless require support and time to implement the Child Safe Standards if this is to be done in the most effective and optimal manner.

11. Within this context and against this background QCEC provides the following responses to the questions raised in Part 1 of the Consultation paper:

Response to Part 1 Questions

Question 1: Are there other principles or elements, not currently referred to in the child safe standards and National Principles that will achieve safer organisational environments in the Queensland context?

QCEC response

12. The Child Safe Standards appropriately reflect the ten child safe standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse and are an appropriate vehicle for giving effect to those recommendations. The Child Safe Standards go beyond child sexual abuse to cover other forms of potential harm to children and young people and aim to provide a nationally consistent approach to creating organisational cultures that foster child safety and wellbeing.

Question 2: Do the categories recommended by the Royal Commission appropriately represent those that should be subject to a potential child safe standards system? Is this scope too broad or narrow and why?

QCEC response

13. From a schooling perspective, the Child Safe Standards are appropriately directed at education providers. Given its purpose, it is important that all organisations that provide services to children are captured under this system. Equally, it is important that associated regulatory systems have inherent flexibility to appropriately manage competing considerations. One example is the role of volunteer parents in schools. The Royal Commission's recommendation was that 'parents or guardians who volunteer for the services or activities that are usually provided to their children, in

respect of that activity, are exempt from screening, except in respect of overnight excursions or stays, and providing services to children with disabilities, where the services involve close, personal contact with those children.'

Question 3: If a regulatory response to child safe standards is implemented, should some sectors be subject to regulation and oversight before others? Why, or why not?

QCEC response

14. Given the existing accreditation regimes of regulated sectors such as education and childcare, it may be beneficial to promoting the safety of children to develop regulation and/or oversight of unregulated or under-regulated sectors as a priority. This would ensure higher risk areas were addressed first.

Question 4: Is the voluntary compliance model or mandatory compliance model likely to be the most appropriate for Queensland? If you consider a particular model is more preferable why is that the case?

QCEC response

15. A mandatory compliance model is preferable as it achieves consistency in the application of the standards across all sectors, increases the likelihood of creating a shared understanding of what a child safe organisation is and, in the longer term, achieves appropriate, positive cultural change across all relevant organisations. Existing regulatory regimes and legislative frameworks can be changed to incorporate compliance with the child safe standards.

16. One approach to implementation may be to consider amending the current 8 areas required in the Child and Youth Risk Management Strategy under the *Working with Children (Risk Management and Screening) Act 2000* to incorporate the 10 Child Safe Standards.

17. There are inherent risks associated with a voluntary compliance model which relies on self-regulation potentially without oversight or appropriate expertise.

18. For the standards to be implemented effectively, organisations also need to be supported by the Queensland Government resourcing implementation appropriately.

19. Given that the standards are outcome based rather than input based, specific information and guidance should be provided to assist organisations understand what compliance with the standards will entail on a practical basis. The standards articulate an aspirational goal for child safety in particular areas, without specifying how each goal is to be achieved and how the achievement is to be assessed and confirmed. Clear stipulation of compliance requirements in sector specific guides will greatly assist organisations to ensure that they are taking the appropriate steps to implement the standards in their own operational context, as **Annexure 1** attempts to do for Catholic schools.

Question 5: If a co-regulation approach was adopted, which existing peak bodies or regulatory mechanisms may be suitable to co-regulate the child safe standards?

QCEC Response

20. At an external level, for Catholic Schools in Queensland this would potentially involve the Non-State Schools Accreditation Board or Blue Card Services (if the Child Safe Standards were incorporated into the existing Child and Youth Risk Management Strategy requirements). Internally this will continue to involve governing bodies and ACSL which manage compliance and adherence to the existing Catholic Safeguarding Standards.

Question 6: Which sectors do not have existing peak bodies, oversight bodies or sector regulators that could take a role in requiring implementation of the child safe standards?

QCEC Response

21. We are not able to comment with authority on other sectors. It is noted that in many instances peak entities, by nature of their governance arrangements, do not have any regulatory, oversight or supervisory role or powers over constituent bodies, which would make their involvement in a co-regulatory model very problematic.

Question 7: Should there be a staged approach to implementing child safe standards focusing on awareness and capacity building before imposing regulation and oversight functions?

QCEC response

22. A staged approach focussed initially on capacity building would ensure that organisations are appropriately engaged and prepared and have the opportunity to develop or enhance present systems to give them the best chance of achieving compliance with the requirements of the Child Safe Standards (so that they are implemented in the most optimal and effective manner).

Question 8: How prepared is your organisation or sector to implement the child safe standards?

QCEC Response

23. QCEC is a peak entity for a diverse set of Catholic School Authorities. Due to the requirements unique to Catholic agencies under existing Catholic Safeguarding Standards, Catholic schools are generally aware of the Child Safe Standards and have in place measures to effect implementation. However, Catholic School Authorities will vary in their preparedness for implementation, reflecting the inherent diversity within the sector. Generally Catholic School Authorities are at least 'somewhat prepared' for implementation. However, preparedness will ultimately depend on the model adopted, and the nature, role, and expectations of any regulators.

24. By way of example, many Catholic School Authorities will already have in place the following steps:
    a. leadership commitment to being child safe and this commitment is embedded in governance structures
    b. public commitment/statement to being child safe
    c. adults associated with the organisation take shared responsibility for protecting all children
    d. annual mandatory student protection training of all staff, specialist/advanced training of staff designated as Student Protection Contacts.
    e. staff routinely report departures from child safe procedures

f. volunteers and other personnel in schools required to complete Student Protection and Code of Conduct training.
g. policies, procedures, processes, and systems to receive, respond and report abuse/harm to students and behaviour of staff that a student considers inappropriate.
h. structures/platforms, processes and opportunities for students to express their views and participate in decisions affecting their educational experience
i. online environments are closely monitored and moderated
j. pre-employment checks for new staff involve multiple layers.

Question 9: What will your organisation need to do to implement the child safe standards? DIAGRAM

QCEC Response

25. As the model for implementation is better understood, staff and leaders within the Catholic system will need to continue to receive appropriate training, have access to resources and will need to seek expert support to enable a shared understanding of safeguarding and any related governance requirements. This will ensure every functional area within an organisation can articulate and act on their safeguarding responsibilities.

Question 10: How much time would your organisation need to implement the child safe standards (if you started today)?

QCEC response

26. Preparedness and time for implementation will ultimately be guided by the nature of the model adopted, and the nature, role, and expectations of any regulators.

27. Without certainty as to the model and any associated resource support from Government, it is difficult to answer this question with precision. Given the diversity that exists within the sector, our best estimate is that implementation timeframes would be a minimum of 12 months (and in some cases 1-2 years) for most Catholic School Authorities. This estimate assumes the continued effective management of other factors which may impact implementation timeframes (e.g. disruptions or remote learning requirements associated with COVID-19).

Question 11: How could an oversight body target monitoring and compliance activities to where they are most needed?

QCEC response

28. An oversight body could target its resources to areas where oversight is most needed by prioritising capacity building and compliance activity in unregulated or under-regulated environments where contact with children is a central focus of the service.

29. Designing a co-regulation model that leverages existing regulatory requirements and the work of bodies that currently monitor schools may also achieve efficiencies. For example, implementation could occur by amending the current eight areas required in the Child and Youth Risk Management Strategy under the *Working with Children (Risk Management and Screening) Act 2000* to incorporate the 10 Child Safe Standards. The existing requirements should be familiar to organisations delivering services to children.

30. In the longer term, issues of non-compliance should result in system reviews to better understand factors that positively and negatively impact on compliance.

Question 12: Which monitoring, and enforcement powers would be most effective in ensuring compliance?

QCEC response

31. A range of monitoring and enforcement powers will enable flexibility and a proportionate response having regard to the operating and regulatory context of the organisation (e.g. lower risk environments vs higher risk environments).

32. The Child Safe Standards note that it is important that monitoring options include the opportunity for children and young people to express their views/perceptions and offer ideas for system improvements as safeguarding strategies are aimed at improving the safety for children and young people who are the consumers of the service. For example, safeguarding audits in an educational context may also include the feedback/views of students.

33. While compliance is important, it is equally, if not more important, to understand the factors that contributed to issues of non-compliance. Understanding why the system/processes to keep children safe from harm were not adhered to, or were not sufficiently effective, enables organisations to look for ways to change the system to improve safeguarding. Therefore, building in a focus on conducting a system review which focuses on organisational learning and improvement and, where relevant, the prevention of the reoccurrence of similar incidents and ultimately assure compliance.

PART 2: REPORTABLE CONDUCT SCHEMES

Response to Part 2 Questions

Question 13: In your sector, which bodies have a role to play in the regulation and oversight of the handling of employee-related child protection matters (such as allegations of child sexual abuse) How could these functions align with a separate body overseeing a reportable conduct scheme?

QCEC response

34. This is managed by Queensland Police Service (per mandatory reporting obligations under the *Education (General Provisions) Act 2006*) and the Queensland College of Teachers (QCT) under s76 and s77 of the *Education (Queensland College of Teachers) Act 2005*. QCT is the disciplinary/ professional registration body overseeing the professional regulation of teachers.

35. It would be problematic - and lead to administrative inefficiencies and duplication - if the existing requirements under s76 and s77 of the *Education (Queensland College of Teachers) Act 2005* to report investigations and outcomes to QCT had to be duplicated with another external body. The preferable way to manage any overlap between the role of the QCT and a body overseeing a reportable conduct scheme would be via an agreed protocol between that body and QCT requiring QCT to manage but report back on matters under its jurisdiction.

36. It is noted responsibilities of QCT apply only to teachers and do not cover the breadth of employees in the education sector.

37. In respect of alignment of complaints and allegation handling processes and an external overseeing body, duplication of processes and multiple reporting of incidents or allegations should be avoided where possible or kept to a minimum. This will assist organisation in effectively managing complaints and allegations, rather than diverting resources and time to double handling and uncertainty of approach.

Question 14: How prepared is your organisation or sector to implement a reportable conduct scheme?

QCEC Response

38. Given the diversity that exists within our sector, preparedness will vary across Catholic schools. Generally Catholic schools will be 'somewhat prepared' for a reportable conduct scheme given existing regulatory requirements, but again preparedness ultimately depends on the nature of the model adopted.

Question 15: How mature are your organisation's or sector's complaints and investigative processes for responding to allegations of employee or volunteer conduct that raises child protection concerns?

QCEC response

39. Given the existing regulatory requirements in the education sector, Catholic schools are generally mature to very mature in managing complaints or responding to allegations of employee or volunteer conduct that raise child protection concerns.

40. With respect to investigations, mandatory reporting requirements require staff to report matters concerning allegations of child sexual abuse or suspected child sexual abuse to police. In some other cases, a reportable suspicion within the meaning of the Child Protection Act may also require reporting to the Department of Children, Youth Justice and Multicultural Affairs. In this context the legal obligation of mandatory reporters is to 'report' rather than 'investigate'.

41. Additionally, there are matters where QCT notifications are necessary.

42. Finally, accreditation requirements also stipulate that Catholic schools have in place well developed policies for managing complaints against staff or volunteers concerning allegations of harm. Designated staff (student protection contacts) are experienced and received advanced training to ensure they can appropriately identify, respond and (where appropriate) investigate (or engage experts to investigate) allegations of harm. Some of the larger systemic Catholic School Authorities also have qualified investigators on staff or may access qualified investigators via QCEC to examine associated disciplinary issues when appropriate to do so.

Question 16: What will your organisation or sector need to do to implement and comply with a reportable conduct scheme?

QCEC response

43. Catholic schools will need to undertake further training of staff and access support and resources from Government and external bodies to comply with the introduction of a Reportable Conduct scheme. The extent of additional training will depend on the nature of the model finally adopted.

Question 17: How much time would your organisation or sector need to develop policies and procedures that implement a reportable conduct scheme?
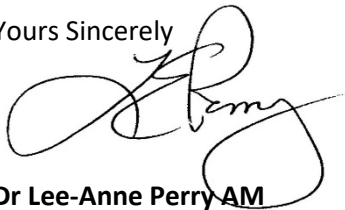
QCEC response

44. This is difficult to answer without having a clearer understanding of the complexity and alignment of the scheme with existing structures, as well as the required training as outlined above. It will depend on the final model adopted and the nature, role and expectations of the regulator.

Conclusion

Thank you for the opportunity to provide comment on the *Growing Child Safe Organisations Consultation Paper*. QCEC is happy to discuss further the feedback provided and looks forward to ongoing dialogue concerning the development and finalisation of the Child Safe Standards and Reportable Conduct Scheme. For further information, please contact Mr Chris Woolley, Chief Operating Officer by email chrisw@qcec.catholic.edu.au or phone (07) 3316 5827.

Yours Sincerely

Dr Lee-Anne Perry AM
Executive Director

Child Safe Standards – National Catholic Safeguarding Standards Implementation Plan

STANDARD 1	
Royal Commission	**Child safety is embedded in institutional leadership, governance and culture**
National Catholic Safeguarding Standards	**Committed leadership, governance and culture** **The leadership and governance of Church entities promotes an inclusive, welcoming environment for children and provide the foundation for transparent, accountable and risk-based approaches to ensure child safety.**
Implementation plan	**The School Authority publicly commits to child safety and leaders champion a child safe culture**
	Student Protection Processes and Guidelines are in place that clearly explain how children will be kept safe, are publicly available and comply with relevant legislated requirements.
	The School Authority has a formally approved policy statement that provides for a public commitment to ensuring child safety and requires schools to comply with the requirements of the *Student Protection Processes and Guidelines*.
	A commitment to child safety as a key value of Catholic education is referenced in duty statements and performance agreements for all staff, including senior leadership positions.

Implementation plan	**Child safety is a shared responsibility at all levels of the School Authority**
	Leadership fosters a strong culture of child safety, for example, through explicit statements of expectations, priorities and principles.
	All staff and volunteers understand their roles and obligations in promoting child safety.
	The Code of Conduct sets out clear expectations in respect of child safety.
Implementation plan	**Governance arrangements facilitate the implementation of the child safe elements and accountabilities are set by School Authority leaders, at all levels of the School Authority's Governance Structures**
	The School Authority ensures that all relevant policies and procedures include appropriate student protection approaches, requirements and responsibilities, and are current and accessible.
	Staff and volunteers are trained in the understanding and following their obligations as set out in the School Authority's Student Protection Processes and Guidelines.
Implementation plan	**Risk management strategies focus on preventing, identifying and mitigating risks to children**
	The School Authority has in place a documented Child and Youth Risk Management Strategy as required by the *Working with Children (Risk Management and Screening) Act 2000*.
	The risk management strategy has a preventative focus in respect of child safety and appropriate controls to identify, assess and address risk.
Implementation plan	**Staff and volunteers comply with a Code of Conduct that sets clear behavioural standards towards children**
	The School Authority conducts training in respect of its Code of Conduct that explores and explains issues relevant to student protection, for example, professional boundaries.
	The Code of Conduct clearly sets out appropriate behaviour standards for staff and volunteers in their interactions with students.

Implementation plan	Staff and volunteers understand their obligations on information sharing and record keeping
	As part of their student protection training, staff and volunteers are informed of the principles to be followed in relation to confidentiality, information sharing and record keeping.
	The School Authority's Student Protection Processes and Guidelines document requirements in respect of confidentiality, information sharing and recording keeping.

STANDARD 2	
Royal Commission	Children participate in decisions affecting them and are taken seriously
National Catholic Safeguarding Standards	Children are safe, informed and participate Children are informed about their rights, and given the opportunity to participate in decisions which affect them and their views are taken seriously
Implementation plan	Children are able to express their views and opportunities are provided to participate in decisions that affect their lives.
	Feedback is sought from students on student protection arrangements and approaches, including whether they feel safe, know who to contact if they have concerns and any changes they would recommend.
	Student input is taken into account in reviewing school student protection arrangements and approaches.
Implementation plan	The importance of friendships is recognised and support from peers is encouraged, in helping children feel safe and be less isolated
	Student wellbeing programs and systems are in place to help students feel safe and less isolated, such as house and buddy arrangements and general pastoral support.
	Student peer support is promoted and encouraged.

Implementation plan	**Children can access sexual abuse prevention programs and information**
	Students are actively made aware of their right to be safe from abuse and know who to contact if they have concerns.
	Student safety curriculum resources are used, for example the Daniel Morcombe Child Safe Curriculum.
Implementation plan	**Staff and volunteers are attuned to signs of harm and facilitate child friendly ways for children to communicate and raise their concerns.**
	Training is provided in relation to recognising the signs of abuse and harm and dealing with disclosures.
STANDARD 3	
Royal Commission	**Families and communities are informed and involved**
National Catholic Safeguarding Standards	**Partnering with families, carers and communities** **Families, carers and communities are informed and involved in promoting child safety**
Implementation plan	**Families have the primary responsibility for the upbringing and development of their child and participate in decisions affecting their child**
	Families are supported and encouraged to act in partnership with schools and take an active role in monitoring students' safety.
	Information and learning opportunities are provided for families in relation to pro-active steps to ensure student safety, for example, cyber safety presentations and discussions.
Implementation plan	**The institution engages in open, two-way communication with families and communities about its child safety approach and relevant information is accessible**
	Information on student protection arrangements and approaches is available for families and community members in a variety of accessible forms, for example, on the school website, in newsletters or in fact sheets.

	Feedback from families and community members is welcomed and encouraged.
Implementation plan	**Families and communities have a say in the institution's policies and practices**
	Input from families and community members is taken into account in assessing the effectiveness and appropriateness of student protection arrangements and approaches.
	Student protection complaints and responses are analysed to determine how improvements or adjustments can be made.
Implementation plan	**Families and communities are informed about the institution's operations and governance.**
	Communication and consultation with school communities are given high priority.
	Information on School Authority organisational structures, included specified roles and responsibilities, is made publicly available in an accessible form.
STANDARD 4	
Royal Commission	**Equity is promoted and diversity respected**
National Catholic Safeguarding Standards	**Equity is promoted and diversity is respected** **Equity is upheld and diversity needs are respected in policy and practice**
Implementation plan	**The institution actively anticipates children's diverse circumstances and respond effectively to those with additional vulnerabilities.**
	Student protection policies and procedures are applied in a manner that ensures that all students, regardless of circumstances and background, are treated in a respectful and safe manner.
	Student protection training takes into account the need for staff and volunteers to be aware of students' diverse circumstances and backgrounds.

Implementation plan	**All children have access to information, support and complaints processes**
	The School Authority works to ensure that all students, regardless of circumstances and background, have full understanding and access to student protection processes and complaints procedures.
Implementation plan	**Particular attention is paid to the needs of Aboriginal and Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds.**
	As well as providing a safe environment for all students, focused attention is provided to the needs and circumstances of students that may be more vulnerable due to their particular circumstances or background.
STANDARD 5	
Royal Commission	**People working with children are suitable and supported**
National Catholic Safeguarding Standards	**Robust human resource management** **Church personnel are suitable and supported to implement safeguarding in practice**
Implementation plan	**Recruitment, including advertising and screening, emphasises child safety**
	Child safe recruitment processes are followed, particularly the checking of references and interview question on issues such as unexplained gaps in work history and frequent changes of employment.
	A commitment to child safety as a key value of Catholic education is referenced in duty statements and performance agreements for all staff, including senior leadership positions.
	Recruitment processes emphasise the importance of compliance with the School Authority's Code of Conduct and Student Protection Processes and Guidelines.
Implementation plan	**Relevant staff and volunteers have working with children checks**
	Teacher registration or possession of a current Blue Card (or valid exemption) is required for all staff and volunteers in contact with students.

	Screening procedures include appropriate verification of potential staff and volunteers' identity, qualifications and professional registration.
Implementation plan	**All staff and volunteers receive an appropriate induction and are aware of their child safety responsibilities, including reporting obligations**
	Staff and volunteers are trained in understanding and following their obligations as set out in the School Authority's Student Protection Processes and Guidelines.
	All new staff and volunteers are provided with a timely and appropriate induction referencing Code of Conduct and child protection obligations and responsibilities.
Implementation plan	**Supervision and people management has a child safety focus.**
	The School Authority's people management processes ensure appropriate oversight from a child safety perspective.
STANDARD 6	
Royal Commission	**Processes to respond to complaints of child sexual abuse are child focused**
National Catholic Safeguarding Standards	**Effective complaints management** **Processes for raising concerns and complaints are responsive, understood, accessible and used by children, families, carers, communities and Church personnel**
Implementation plan	**The institution has a child focussed complaint handling policy which clearly outline roles and responsibilities, approaches to dealing with different types of complaints and obligations to act and report.**
	Documented complaints processes are in place that are publicly available and meet the requirements of section 7 of the *Education (Accreditation of Non-State Schools) Regulation 2017*.
	The complaints processes set out clearly the steps to be taken in dealing with complaints and allocates responsibilities for ensuring that each step in the process in undertaken appropriately.
	The complaints processes are student friendly and easily assessible.

Implementation plan	**Effective complaint handling processes are understood by children, staff, families and volunteers.**
	Information on the complaints processes is provided in an accessible and easily understood manner.
Implementation plan	**Complaints are taken seriously, responded to promptly and thoroughly, and reporting, privacy and employment law obligations are met.**
	Tracking of complaints is documented to ensure appropriate management.
	All compliance requirements are met in the processing of complaints.
STANDARD 7	
Royal Commission	**Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training**
National Catholic Safeguarding Standards	**Ongoing education and training** **Church personnel are equipped with knowledge, skills and awareness to keep children safe through information, ongoing education and training**
Implementation plan	**Relevant staff and volunteers receive training on the nature and indicators of child maltreatment, particularly institutional child sexual abuse**
	In accordance with legislated requirements under the *Education (Accreditation of Non-State Schools) Act 2017*, annual child protection training is provided to all school staff.
	Volunteers are provided with student protection training in a manner that is deemed appropriate, for example, online training.
Implementation plan	**Staff and volunteers receive training on the institution's child safe practices and child protection.**
	Staff and volunteer training explain responsibilities and reporting obligations in accordance with the School Authority's Student Protection Processes and Guidelines.

Implementation plan	Relevant staff and volunteers are supported to develop practical skills in protecting children and responding to disclosures.
	Staff and volunteers are provided with training and professional development to ensure their skills are appropriate when dealing with students.
STANDARD 8	
Royal Commission	Physical and online environments minimise the opportunity for abuse to occur
National Catholic Safeguarding Standards	Safe physical and online environments Physical and online environments promote safety and contain appropriate safeguards to minimise the opportunity for children to be harmed
Implementation plan	Risks in the online and physical environment are identified and mitigated without compromising a child's right to privacy and healthy child development
	As part of schools' overall risk management plans, consideration is given to how physical and online environments may relate to student protection issues.
	Risk assessment of physical environments should include consideration of visibility and natural surveillance.
Implementation plan	The online environment is used in accordance with the institution's Code of Conduct and relevant policies.
	The Code of Conduct provides clear and documented standards of use for the online environment.
	The Code of Conduct includes specific reference and requirements in relation to staff and volunteers interacting with students via the online environment.
	Education and training are provided to students, staff and volunteers is respect of safe and appropriate use of the online environment.

STANDARD 9	
Royal Commission	**Implementation of child safe standards is continuously reviewed and improved**
National Catholic Safeguarding Standards	**Regular improvement** **Church entities regularly review and improve implementation of their systems for keeping children safe**
Implementation plan	**The institution regularly reviews and improves child safe practices**
	There is a documented strategy for evaluating and reviewing student protection arrangements and approaches on a periodic basis.
	Compliance with legislated student protection requirements is demonstrated as part of school's cyclical review by the Non-State Schools Accreditation Board.
	The School Authority promotes a culture of continual awareness and improvement in relation to student protection.
Implementation plan	**Complaints and concerns are analysed to identify causes and systemic failures to inform continuous improvement.**
	Documented processes are in place for review and analysis of student protection complaints and incidents.
	Upon review, actions are taken to address issues and causes identified through reviews.

STANDARD 10	
Royal Commission	**Policies and procedures document how the institution is child safe**
National Catholic Safeguarding Standards	**Policies and procedures support child safety** **Policies and procedures document how the Church entity is safe for children**
Implementation plan	**Policies and procedures address all child safe organisation elements**
	Approved Student Protection Processes and Guidelines are in place.
	A Child and Youth Risk Management Strategy is implemented in accordance with the *Working with Children (Risk Management and Screening) Act 2000*.
Implementation plan	**Policies and procedures are accessible and easy to understand**
	The School Authority's Student Protection Processes and Guidelines and other student protection policies and procedures clearly explain how children will be kept safe and are publicly available.
Implementation plan	**Stakeholder consultation informs the development of policies and procedures**
	The views of students and parents are taken into account in the development and review of student protection policies, processes and procedures.
Implementation plan	**Leaders champion and model compliance with policies and procedures**
	School Authority and school leadership take responsibility for ensuring the propagation and implementation of all student protection policies and procedures.
Implementation plan	**Staff and volunteers understand and implement the policies and procedures.**
	Staff and volunteers are trained in their student protection obligations in an ongoing and self-reflective manner.