



Catholic Diocese of  
**TOOWOOMBA**

# SAFEGUARDING CHILDREN AND VULNERABLE ADULTS PREVENTION AND PROTECTION POLICY



*15 December 2014*

# Foreword

Dear friends,

The Church and indeed the community at large expect that children and vulnerable adults, while involved in any Church ministry, will be protected from all forms of harm including sexual, physical and psychological harm as well as ill-treatment and neglect.

Despite this expectation, I am saddened to read in the 2014 Interim Report of the Royal Commission into Institutional Responses to Child Sexual Abuse that they had received some 3,309 individual accounts (either in writing or in private hearings) of abuse and/or harm suffered whilst associated with an institution. Of the 1,719 institutions mentioned, I note that 703 (41%) were Catholic.

As Bishop of the Diocese of Toowoomba, I abhor such incidence of harm/abuse and wholeheartedly support the clergy, religious, employees and volunteers of the Diocese who daily demonstrate their commitment to the protection of children and vulnerable adults from preventable harm.

It is with a sense of achievement and purpose I approve this Safeguarding Children and Vulnerable Adults policy that prescribes contemporary best practice to enable the prevention of harm to, and the protection of children, young people and vulnerable adults. This policy meets the requirements of the Diocese's Child Safety Risk Management Strategy reissued to Parishes in January 2013.

I commend this revised and updated policy to Diocesan agencies and parishes as a valuable tool for your work with the vulnerable and young people.

The Code of Ethical Behaviour for employees and volunteers who work in service of the Church within this policy underlines our responsibility to report incidents should a disclosure of abuse be identified.

Training for the implementation of this policy, monitoring and regular auditing for compliance are important practices. I rely upon the clergy, religious, employees and volunteers of the Diocese who dedicate themselves to the service of the Church to do everything possible to ensure our success in this aspect of the Church's work.

May God bless you and those entrusted to your care.



Most Rev. Robert M. McGuckin DD MCL JCL

**Bishop of Toowoomba**

15 December 2014

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## ACKNOWLEDGEMENTS

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Diocese of Austin: *Ethics and Integrity in Ministry* have been used with permission

Diocese of Toowoomba *Child Safety Risk Management Strategy*

Dr. Majella Albion Professional Standards and Safeguards Committee Diocese of Toowoomba

Materials developed by the National Board for Safeguarding Children in the Catholic Church, Ireland: *Safeguarding Children*

Michele Vuleta, Safeguarding Children Officer, Archdiocese of Brisbane

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## INTRODUCTION

The Diocese of Toowoomba is committed to safeguarding children and the vulnerable. This document outlines policy and procedures to be adopted by Diocesan agencies and parishes. It is the next step in refining our long held practices of providing a safe environment and activities that respect and acknowledge the inherent dignity of each human being. Additional useful materials are provided in a separate **Resources Document**.

The policy applies to everyone whose work is of a pastoral nature within the Diocese. 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 Reprinted in April 2010).

The document meets the requirements of the Diocese's current Child Safety Risk Management Strategy and applies to clergy, religious, employees, students on placement, and volunteers in parishes and agencies of the Diocese.

It is intended to provide a uniform standard of best practice in safeguarding children and the vulnerable. It contains our policy statement that articulates the core principles, church documents and legislation upon which it is based. The safeguarding procedures are built around four key standards:

- safe recruiting and selection practices;
- code of conduct;
- safe activities and environments; and
- processes for responding to concerns about inappropriate behaviours of clergy, religious, employees, and volunteer workers.

The separate **Resources Document** offers practical examples and various administrative tools and forms that will assist parishes and agencies in adhering to this policy and meeting their obligations for implementing the policy standards, record keeping, and monitoring for compliance audit purposes.

## POLICY STATEMENT

*...for it is to such as these that the kingdom of God belongs.*

Mark 10:14

***Children 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 safeguarded.***

Catholic Social Teachings reinforce human dignity and emphasise that not only children but also the poor, the vulnerable and every human being who is created in God's image and likeness is valuable and worthy of respect.

This means that everyone in the Church must ensure that the fundamental rights of both children and the vulnerable are respected. This can be achieved through the development of respectful relationships and a commitment to safety embracing appropriate boundaries, behaviours, and practices, in accordance with the Diocese of Toowoomba's *Code of Ethical Behaviour* as well as adherence to the legislative imperatives of the State.

This policy statement is approved by Bishop Robert McGuckin for implementation by Church Parishes and Agencies throughout the Diocese of Toowoomba. It covers the measures needed to safeguard against abuse and supports the Diocese's aim to ensure that not one of its personnel engages in behaviour that could allow abuse to occur or take actions that could be interpreted by children, their families or other adults as constituting, or leading to, abuse. Every step possible to safeguard against abuse and harm must be taken.

## GOSPEL VALUES

The values of love, dignity, and justice as demonstrated by Jesus underpin this policy. Jesus especially showed care for the poor, powerless, and vulnerable. He particularly loved children in their purity and innocence: "*...for it is to such as these that the kingdom of God belongs...*" (Mark 10:14). All people are called to cherish and safeguard children and the vulnerable from anyone who would harm them.

## CORE PRINCIPLES

Children and the vulnerable have a fundamental right to be respected, nurtured and safeguarded by all.

The Diocese of Toowoomba is committed to taking the necessary steps to:

- demonstrate that the right to protection from harm of children and the vulnerable is paramount;
- safeguard children and the vulnerable;
- foster known best practice that contributes to a safe environment;
- demonstrate accountability through establishing effective structures and timely practices;
- ensure prompt responses to any concerns raised;
- support Diocesan organisations and personnel in safeguarding children and the vulnerable;

- uphold safe recruitment and selection practices for all Church personnel, including volunteers, as a positive demonstration of the Diocese's commitment to employ people who will keep children and the vulnerable safe from harm;
- uphold and maintain standards of conduct which set out clear guidelines regarding ethical behaviour as an essential part of keeping children and the vulnerable safe;
- maintain play and learning environments in a safe manner to ensure children's safety; and
- acknowledge cultural differences and, as appropriate, take these into account in assessing levels of risk and/or acceptable behaviour standards.

## DEFINITIONS

Agencies for the purposes of this policy include:

- Toowoomba Catholic Education Office;
- Centacare Toowoomba;
- Lourdes Home for the Aged;
- Diocesan Finance and Administration Department;
- Diocesan Councils, Committees and/or Commissions;
- Toowoomba Refugee and Migrant Services (TRAMS);
- James Byrne Centre;
- Special Religious Development for People with Intellectual Disability (SPRED); and
- all other Ministries including those providing support services to and in parishes and/or deaneries.

## Abuse

Abuse generally involves one or more of five main forms of abuse:

- domestic violence;
- emotional abuse;
- neglect;
- physical abuse;
- sexual abuse.

**It is essential to our understanding within the Diocese of Toowoomba that we recognise abuse is not just about sexual abuse.**

## Child

The *Child Protection Act 1999 Sect.8* defines a child as an individual less than 18 years of age.

## Child in need of protection

The *Child Protection Act 1999* (amended 2014) defines a child in need of protection as one who has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and, does not have a parent able and willing to protect the child from harm. This may include detrimental effects on the child's body or their psychological or emotional state that are evident or are considered to be likely to become evident in the future.



## Domestic violence

Domestic violence occurs when one person in an intimate relationship behaves in a way that causes fear or harm to another person. Exposure to such domestic and family violence can impact on the physical, psychological, spiritual and emotional well-being of those who are vulnerable.

## Emotional abuse

Emotional abuse is the persistent emotional ill-treatment of a child or a vulnerable person such as to cause severe, ongoing adverse effects on the person's emotional development. It may involve constant criticism, belittling, teasing, constant yelling, withholding praise and affection, exposure to domestic and family violence, or conveying that the person is worthless or unloved, inadequate or valued only insofar as s/he meets the needs of another person.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of reasonable exploration and learning, or preventing the child from participating in normal social interaction.

The various types of emotional abuse include:

- Verbal (insulting, swearing or yelling at someone);
- Put Downs (name calling, blaming them for everything, public embarrassment);
- Bullying (repeatedly saying or doing hurtful things to someone);
- Isolation (limiting contact or stopping someone from contacting other people); and
- Money (controlling or withholding someone's money, taking money, preventing someone from taking up work)

## Grooming

Child sex offenders use many strategies to get close to children (known as grooming). Grooming allows child sex offenders to form 'special' or 'power-based' relationships with children. It is also used to maintain secrecy so the child will not tell. Grooming can take place over days, weeks or even years.

Grooming behaviour is a process whereby an adult person may 'condition' and build rapport with children or a vulnerable person using tactics to establish trust, in order to reduce their resistance to inappropriate conduct. Grooming behaviour may be a precursor to sexual assault.

The grooming process can include strategies such as:

- persuading a child or a vulnerable person that a 'special relationship' exists;
- spending inappropriate special time with the person;
- inappropriately giving gifts;
- showing special favours to them but not other children or persons;
- allowing the child or vulnerable person to overstep the rules;

- testing of boundaries – in the case of children, undressing in front of them, allowing the child to sit on the lap, talking about sex, ‘accidental’ touching of genitals; or
- asking the child or a vulnerable adult to keep secrets from others including parents, siblings and friends. The secrets may not necessarily be sexual but may be used as a ‘test’ to establish if they can keep a secret. Shared secrets help to build a vulnerable person’s feelings of ‘being special’.

Individual incidents of the above behaviours may not be indicative of grooming if occurring in isolation, but if there is a pattern of behaviour occurring, this may be indicative of grooming.

## Harm

Harm is any detrimental effect of a significant nature on the person’s physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. It may be caused by a single act, omission, or circumstance; or a series or combination of acts, omissions or circumstances.

## Liturgy of the Word for CHILDREN (LWC)

LWC is ritual centred on the proclamation and breaking open of the scriptures in a manner that is accessible to children. The children do what the rest of the community is doing at this point of the Mass, usually in a location adjacent to the gathered assembly.

## Neglect

Neglect becomes apparent in different ways over a period of time rather than at one specific point. It is the persistent failure to provide the basic necessities of life such that an individual’s health and development are affected. Basic needs include: food, housing, health care, adequate clothing, personal hygiene, hygienic living conditions, timely provision of medical treatment, affection, adequate supervision. Neglect may occur during dysfunctional periods of a family’s life occasioned by circumstances such as loss of self-esteem, alcoholism, or substance abuse by a parent/carer.

## Parish Pastoral Council (PPC)

A group of parishioners gathered by means of discernment from the community, to ensure that the local church community has every possible opportunity to carry forward the mission of Jesus.

## Physical Abuse

Physical abuse is any non-accidental physical injury or injuries to a child or other person. This includes inflicting pain of any sort or causing bruises, fractures, burns, electric shock or any unpleasant sensation. Physical harm also may be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in another person.

Physical abuse, as well as being a result of an act of commission can also be caused through omission or the failure to act to protect.

Some level of emotional abuse is involved in all types of ill-treatment though it may occur alone.

## Risk

A risk is anything that can cause harm or loss to a child or a vulnerable person.

## Self-harm

Self-harm refers to harm that a person inflicts upon himself or herself. It may be by direct means including cutting and burning but could also be by engaging in serious risk-taking behaviours such as alcohol/substance abuse, recklessly dangerous physical activities and/or unsafe promiscuity. (Note: In some cases, self-harm may at times be an indication of sexual abuse.)

## Sexting

Sexting refers to the act of sending sexually explicit photographs or messages electronically.

## Sexual abuse

Sexual abuse includes sexual assault, sexual harassment, or any other conduct of a sexual nature that is inconsistent with the integrity of the relationship between a Church worker and those who are in their pastoral care.

Sexual abuse includes sexual behaviour involving a vulnerable person and another person in the following circumstances:

- The other person bribes, coerces, exploits, threatens or is violent toward the relevant person;
- The vulnerable person has less power than the other person;
- There is a significant disparity between the vulnerable person and the other person in intellectual capacity or maturity.

Sexual abuse involves forcing or enticing a person to take part in sexual activities including prostitution, whether or not that person is aware of what is happening.

The activities may involve physical contact including penetrative (e.g., rape, buggery, or oral sex) or non-penetrative acts (oral sex).

It may include non-contact activities such as involving a child or a vulnerable person looking at or participating in the production of pornographic material, watching sexual activities or encouraging such persons to behave in sexually inappropriate ways.

Such behaviour is not confined to a particular working group, class or individual. The vulnerable can be sexually abused by any male and/or female or by any other adult and/or child.

## Standards

Standards are those expectations and behaviours of clergy/religious and lay church workers/volunteers as articulated in the National Committee for Professional Standards publications: [Integrity in Ministry](#), [Integrity in the Service of the Church](#), and the Diocese of Toowoomba Code of Ethical Behaviour.

## The Vulnerable

The vulnerable are people aged 18 and over who may need care or services by reason of age, illness, frailty, mental disability, other disability, or their culturally and linguistically diverse background, and who therefore may be unable to take care of themselves or protect themselves against serious harm or exploitation.

## Vulnerability

Vulnerability, the susceptibility to harm, results from an interaction between the resources available to individuals and communities and the life challenges they face. Vulnerability results from developmental problems, personal incapacities, disadvantaged social status, inadequacy of interpersonal networks and supports, degraded neighbourhoods and environments, and the complex interactions of these factors over the life course. The priority given to varying vulnerabilities, or their neglect, reflects social values.

### ASSOCIATED DOCUMENTS

Diocese of Toowoomba Child Safety Risk Management Strategy. January 2013.

National Committee for Professional Standards, [Integrity in Ministry](#). A document of principles and standards for Catholic Clergy and Religious in Australia. June 2004 Reprinted in 2010.

National Committee for Professional Standards, [Integrity in the Service of the Church](#). A resource document of principles and standards for lay workers in the Catholic Church in Australia. September 2011.

National Committee for Professional Standards, [Towards Healing](#). Principles and procedures in responding to complaints of abuse against personnel of the Catholic Church in Australia. January 2010.

### LEGISLATION

[Aged Care Act 2010](#)

[Child Protection Act \(QLD\) 1999](#)

[Child Protection Regulation 2011](#)

[Child Protection Reform Amendment Act 2014](#)

[Disability Services Act 2006](#)

[Education \(General Provisions\) Act 2006](#)

[Education \(Accreditation of Non-State Schools\) Act and Regulation](#)

[Family and Child Commission Act 2014](#)

[Guardianship and Administration Act 2000](#)

## REVIEW

To be reviewed annually by the Executive Officer of the Diocesan Professional Standards and Safeguards Committee.

## SECTION 1: SCOPE INCLUDING ROLES AND RESPONSIBILITIES

*If we wish to lead a dignified and fulfilling life, we have to reach out to others  
and seek their good.*

*'The love of Christ urges us on.'* 2 Cor 5:14

Pope Francis in [Evangelii Guardium](#) (9) 2013

The Diocese of Toowoomba's Safeguarding Children and the Vulnerable Policy applies to clergy, religious, employees, students on placement, and volunteers who are responsible for safeguarding children and the vulnerable while in contact with or in the care of a parish/agency. The various parties involved in these relationships are expected to exercise their duties/responsibilities in a responsible and caring manner. They include:

### 1.1 PARISH PRIEST/SUPERVISOR/COUNCIL MEMBER

People in supervisory or leadership type roles play a key role in modelling expected behaviour and the training of employees and volunteers. People in such positions can minimise risks to children and the vulnerable by:

- adopting recruiting and selection practices which safeguard children and the vulnerable;
- ensuring that employees and volunteers who undertake activities with children and the vulnerable understand their duties and responsibilities and have clearly articulated and documented role descriptions;
- providing for employees and volunteers to be trained appropriately for working with children and the vulnerable and to understand their obligations in this regard;
- supporting and encouraging a safe and secure environment;
- monitoring and supervising subordinates' performance;
- dealing with inappropriate behaviour in a timely and immediate manner;
- responding to complaints, suspicions and/or allegations in a prompt and professional manner; and
- ensuring victimisation does not play a part in such processes.

### 1.2 LOCAL SAFEGUARDING REPRESENTATIVE (CHILDREN AND THE VULNERABLE)

Each Agency, Parish and/or Deanery and/or Ministry is to identify an individual who will be their local Safeguarding Representative (Children and the Vulnerable).

This role may be held by a parish employee, a parishioner on a voluntary basis, a Ministry Coordinator or a member of the faithful from the local parish school conversant with student protection and/or workplace health and safety. A member of the Parish Finance Committee or Pastoral Council (or their nominee) also may take on this task.

In larger Diocesan Agencies, an employee who is responsible for and/or familiar with Student Protection, Child Safety or Risk Management practices could undertake this activity. A Ministry coordinator

The Local Safeguarding Representative is responsible for:

- making sure that the parish/agency is aware of the importance of safeguarding children and vulnerable adults, through regular communications with staff/community members;
- promoting safe practices including acting as a point of contact to articulate what is appropriate and inappropriate behaviour; and,
- assisting in the administration of the Diocese's Safeguarding Policy as it applies to their location and/or area of work. A description of the tasks associated with a Local Safeguarding Representative (Children and Vulnerable Adults) can be found in *the*

[Resource Documents - Appendix 2.1](#). The Resources Documents folder and the accompanying policy can be readily sourced on the Diocese's website.

A Parish Newsletter/Bulletin also should be used to publicise the existence of the Diocese's Safeguarding Children and the Vulnerable Policy. Such publications can serve to:

- solicit expressions of interest in the position of a Local Safeguarding Representative (Children and Vulnerable Adults) along with the rationale for such a position (i.e., to assist the community to maintain and improve a culture of keeping children and the vulnerable safe and caring for their welfare). The wording used should reflect specific, local parish circumstances;
- announce opportunities for interested folk including children and young people within the community to meet their local Safeguarding Representative (e.g., Children's Liturgy of the Word occasions, Pastoral Council meeting, Youth Sundays, Post Mass social gatherings); and
- at or about the time the Parish completes and promulgates the results of an annual Financial Audit; enable the Safeguarding Representative to also report on how well the deanery/parish/ministry has complied with this policy.

A complementary measure, once a person is appointed as a Safeguarding Representative, is to print a bulletin insert or mount posters on notice boards with the Representative's photograph, name and contact number for parishioners' information.

### 1.3 EMPLOYEES, VOLUNTEERS AND STUDENTS ON PLACEMENT WORKING WITH CHILDREN AND THE VULNERABLE

Diocesan workers whether they are employees, volunteers or students need to be screened, prepared, nurtured and supported to undertake their ministry and/or agency activities.

There is an expectation that employees, volunteers and students on placement who work with the vulnerable including children will:

- report issues, activities, equipment, policies and work practices that are unsafe and potential areas of risk;
- engage in appropriate behaviour;
- use appropriate language and interactions that empower those they serve and/or work with;
- provide the highest standard of service provision;
- participate in professional training and development; and
- understand the requirements of their role.

To achieve the above outcomes volunteers and employees will need to participate in:

- a recruitment and selection process;
- an induction into the organisation;
- training in the role; and
- performance feedback or an appraisal system (as required).

Tools for recruitment, selection, induction, training and performance feedback for volunteers can be found in the Resources Document. For additional information and/or assistance contact the



#### 1.4 FAMILIES, CARERS AND OTHERS IN THEIR CARE

Families and carers can support a Parish/Agency's risk management approach by:

- providing the required support to participate in the various activities including teaching self-protective behaviours;
- taking part when appropriate in the planning, management and delivery of activities;
- reporting when a person be experiencing bullying or harassment whilst participating in an activity/service; and
- reporting when there is a suspicion that someone is being abused or harmed.

Where practicable, there is a need also to encourage children and the vulnerable in the diocese's care to contribute to a safe environment by:

- showing respect towards other children and adults;
- being mindful of situations that may place them at risk of harm; and
- speaking up when they may experience or observe inappropriate behaviour or unsafe situations.

## SECTION 2: PREVENTION AND PROTECTION PRACTICES

Research by the Truth Justice and Healing Council (August 2013) indicates that *the greater the number of organisational strategies implemented, the more safe children and the vulnerable will be in their contacts with the organisation*. In developing and extending a culture of care and support of children and the vulnerable, the Diocese supports a range of safety measures including:

- recruitment and selection practices that contribute to the identification of workers able to hold down positions of trust;
- adherence to a *Code of Ethical Behaviour* – e.g., having clear guidelines that set out what is and is not acceptable behaviour in an environment that aims to make children and the vulnerable safe from harm;
- the conduct of activities in a manner that provides a safe environment; and
- speedy reporting to appropriate authorities when a child or a vulnerable adult is and/or appear to be the subject of harm and/or abuse by another person irrespective of that person's status or relationship.

## 2.1 SAFE RECRUITMENT AND SELECTION PRACTICES

A key preventative strategy in safeguarding children and the vulnerable is to make it clear to all who are involved that it is a safe, protective and vigilant environment. Compliance with this strategy will be undertaken by Safeguarding Representatives; monitored and checked annually by the Executive Officer of the Diocese's Professional Standards and Safeguards Committee. An annual Protection and Prevention Compliance Checklist will be used for this purpose - **see [Resource Documents: Appendix 1](#)**.

While the vast majority of people who want to work with children and the vulnerable are well-motivated, effective recruitment and selection procedures will help screen out those who are not suitable, thus enhancing the prospects of identifying the best person for the job and preventing unsuitable people from working with children and the vulnerable in Parishes/Agencies. Recruitment of employees should follow established staff selection procedures developed for use by a Parish/Agency.

When recruiting employees or volunteers ensure safe practices by following the recommended steps of:

- having task descriptions for each of the roles;
- having the person complete an application/declaration form;
- asking recommended interview questions;
- ensuring that the candidate is not a disqualified person;
- presenting the selected person with an engagement letter;
- completing an induction process with the new person; and
- entering the volunteers' details into the volunteer register.

The [Resource Documents](#) section contains sample volunteer task descriptions and other volunteer forms to assist you in the recruitment and induction process.

### Sample Position Descriptions:

- Local Safeguarding Representative (Children and the Vulnerable) [Appendix 2.1](#)
- Children's Liturgy of the Word (CLOW) Leaders [Appendix 2.2](#)

- Sacramental Team Coordinator [Appendix 2.3](#)
- Sacramental Team members [Appendix 2.4](#)
- Altar Servers Trainer [Appendix 2.5](#)
- State School Religious Instruction Catechist [Appendix 2.6](#)
- Youth Worker [Appendix 2.7](#)

#### Other Forms for Volunteers:

- Volunteer Application/Declaration Form [Appendix 2.8](#)
- Interview Questions [Appendix 2.9](#)
- High Risk Indicators – Checklist when considering youth worker applicants [Appendix 2.10](#)
- Volunteer Engagement Letter [Appendix 2.11](#)
- Volunteer Induction Checklist [Appendix 2.12](#)
- Who needs a Blue Card and who is disqualified from holding a card? [Appendix 2.13](#)
- Volunteer Register [Appendix 2.14](#)

### **2.1.1 Positive Notice to Work with Children Check (Blue Card)**

Possession of a blue card is not a standalone strategy for safeguarding children. Protection of children requires that a suite of strategies be put into practice as outlined in this policy.

Information around initial application and renewal processes can be found on the Queensland Government's Public Safety Business Agency website. It is critical that the person responsible for maintaining the blue card register is aware of the agency's specific requirements.

This requires the development and implementation of an annual risk management strategy that takes into account screening requirements for volunteers and employees including those who:

- have begun employment pending outcome of Positive Notice to Work with Children Check (Blue Card);
- hold a Positive Notice to Work with Children blue card;
- are not required to hold a Positive Notice to Work with Children blue card; and
- are having their Positive Notice to Work with Children blue card reassessed.

The Positive Notice to Work with Children Check is a national check of a person's criminal history. Disciplinary information held by certain professional organisations or information from police investigations into allegations of serious child related sexual offences will also be considered.

Child Protection Reform Amendment Act 2014 prescribes child related regulated employment categories in which the Positive Notice to Work with Children Check (blue card) is mandatory.

All employers within the Diocese must warn all potential workers (paid employees, volunteers and students on placement) that it is an offence for a disqualified person to sign a Positive Notice to Work with Children (blue card) application. For example: *'I am legally obliged to warn you that it is an offence for a disqualified person to sign a Positive Notice to Work with Children blue card application form.'* The worker also must sign the declaration on the application form stating they

have been warned that it is an offence for a disqualified person to sign a Positive Notice to Work with Children blue card application. [Resources Documents – Appendix 2.13](#) lists who is a disqualified person. It is an offence for an employer not to provide the warning.

When a person submits an application and it is approved, a positive notice (letter) and a Positive Notice blue card will be issued. If an application is refused, a negative notice is issued. This prohibits the person from working in regulated employment categories as defined by the Act. (For more information refer to <http://www.bluecard.qld.gov.au/index.html> ). The work and activities undertaken with children within the Diocese either in a paid or voluntary capacity are governed by this legislative requirement. Therefore, employees (unless exempt) and volunteers working with children must apply for and obtain a Positive Notice to Work with Children blue card. It is the responsibility of the employee and/or volunteers to ensure that their Positive Notice blue card is maintained and current.

As part of the Parish/Agency Risk Management Strategy, a Positive Notice Blue Card Register is to be kept and maintained by individual Parishes and Services and reviewed annually. Local Safeguarding Representatives and/or the Executive Officer Professional Standards will conduct random audits of blue card registers from a selection of parishes/agencies annually.

### 2.1.1.1 Exemptions

There are some exemptions under the Act to holding a blue card. These include:

- parent volunteering their services or conducting activities through a Church, club or association when their child/children are involved in the same or similar activity; (However, the Diocese recommends that all parents obtain a Positive Notice blue card to cover events where their own children may not be in the particular group they are working with);
- children under 18 years who are volunteers – except students required to work in regulated employment as part of their studies;
- parents volunteering their services at the school that their child/children attends so long as the child is under 18 years of age;
- Police officers and registered teachers – they will need to apply for an **EXEMPTION CARD** when providing child-related services that are outside of their professional duties such as volunteering with a community organisation.

### 2.1.1.2 Paid Employees

All paid employees (unless exempt) who work with children will be required to hold a blue card when they work:

- eight consecutive days or more;
- once a week or more, each week over four weeks;
- once a fortnight or more, each fortnight over eight weeks; or
- once a month or more, each month over six months.

**Unless an employee holds a Positive Notice Blue Card or is able to certify s/he is eligible for such a card, they are unable to work with children.**

Parishes/agencies must submit an authorisation form to confirm a valid blue card application if they employ someone who already holds a blue card. This is mandatory for all employers and

ensures the Commission has current employment details for all blue card holders and that employers/organisations will be notified by the Public Safety Business Agency of any relevant change in status of the blue card holder.

### 2.1.1.3 Volunteers

Parishes/Agencies welcome people to volunteer their time to support individual ministries (e.g., liturgical activities involving children, assisting in the spiritual development of people with intellectual disability (e.g., SPRED) or showing care and concern for the vulnerable including refugees or the frail or elderly). It is the employer's responsibility to ensure compliance with relevant legislation and that a volunteer is appropriate for the role, by following the recommended recruitment and selection processes contained within this policy.

It is uncertain if and when a worker will encounter children in a person's premises (including that of a vulnerable adult).

**Given the potential for coming into contact with children, the Diocese supports a policy that, in their dealings with the vulnerable, a volunteer should hold a Positive Notice Blue Card or its equivalent.**

**In no circumstances, can a volunteer worker work directly with children without a Positive Notice Blue Card.**

## 2.2 CODE OF ETHICAL BEHAVIOUR

The nature of one's interpersonal relationship with others is a critical aspect of Christian life. In our various ministries, **the nature of such relationships is best characterised by collaboration, effective communication, consistency in approach with no intention to harm or allow harm to occur to others.**

Mindful of this requirement, Clergy and Religious are bound by the standards for ethical behaviour articulated in '*Integrity in Ministry.*'

The principles of conduct for any lay person who performs paid or unpaid work in the service of the Church (*Church Worker*) parallel those for religious and clergy and can be found in "*Integrity in the Service of the Church*".

Given its importance, the Bishop of Toowoomba has approved a *Code of Ethical Behaviour* for those who work as employees, volunteers or as students on placement within the Diocese of Toowoomba. This Code clarifies and affirms the standards of behaviour expected of such workers. Breach of this code will be regarded as serious misconduct and may result in appropriate disciplinary action being taken and, in the case of an employee, dismissal of their services.

For more information, the Diocese's Code of Ethical Behaviour is available in the [Resources Document – Appendix 3](#)

This Code requires workers to:

- 1. commit to justice and equity;**
- 2. uphold the dignity and right to respect of all people;**
- 3. commit to safe and supportive relationships;**

4. **respond with integrity to those who are not in a position of power or authority, poor, alienated or marginalised;**
5. **accept responsibility for the protection of children and the vulnerable;** and
6. **maintain appropriate professional boundaries in all physical and virtual contact settings.**

**Note:**

1. While mindful of these principles and the Diocese's code of conduct, agencies such as Catholic Education, Centacare Toowoomba, and Lourdes Home for the Aged also are bound by their respective agency's professional and complementary code of conduct.
2. An important aspect associated with the maintenance of a professional boundary involves how we handle personal information. This includes the Photography/Video Recording of Children and the Vulnerable.

Parishes/agencies can involve children and the vulnerable in a range of liturgical, pastoral and formational activities. For recording purposes, it is not uncommon for parents, carers and other family members to take photographs of these occasions. Given the possibility of such an occurrence, parishes/agencies must take actions to ensure that people who attend these activities take photographs or video footage only for appropriate purposes.

It is essential that the parish/agency makes clear to all in attendance that taking a photograph can be construed as obtaining personal information and therefore should be treated as any other item of personal, confidential information.

The responsibility for this notification lies with the Parish Priest/Pastoral Leader/Agency head but can be delegated, for example to the coordinator of the activity such as the Parish's Sacramental Preparation Coordinator or an Agency Coordinator.

The actions recommended for dealing with such instances including a template Media Consent Form are found in [Resource Documents - Appendix 4](#)

3. Workplace conduct deemed inconsistent with the Diocese's *Code of Ethical Behaviour* includes but is not limited to being engaged in activities or situations that can give the appearance of:
  - bullying;
  - sexual or other harassment;
  - exploitation;
  - sexual exploitation;
  - a conflict of interest;
  - abuse as defined in the Church's *Towards Healing* document;
  - possession or distribution of pornographic material;
  - abuse of alcohol, drugs or gambling that in any way interferes with the person's service and/or work on behalf of their Parish/Agency; as well as
  - any form of criminal conduct including stealing or any other form of theft or any form of assault.

## 2.3 SAFE ACTIVITIES - PLANNING ACTIVITIES FOR CHILDREN AND THE VULNERABLE

Those who work for Diocesan agencies such as Catholic Education, Centacare Toowoomba, SPRED, and Lourdes Home for the Aged must follow their agency's relevant policy/procedures that prescribe risk management planning practices in order to provide a safe environment for their students, vulnerable adults, patients, or clients.

The diocese's commitment to the safety of children and the vulnerable along with State and Commonwealth laws requires a parish/ministry to undertake risk assessments of activities undertaken and/or services provided. As part of the overall risk management strategy, the assessment of potential risks is a critical measure in minimising harm to a child or a vulnerable individual.

For this purpose, a risk is anything, including the behaviour of others that can cause harm or loss to children or the vulnerable.

In assessing any activity or service provision within the Diocese it is important to consider how harm might occur, why and when it could occur. Workplace Health and Safety Officers can advise and/or assist with assessing the level of risk associated with a given activity. Once the level of risk is determined, the risks can be prioritised and options that effectively control the situation can be considered for implementation.

Risk assessments must be conducted on all activities and services provided within the Diocese that involve children and the vulnerable. These assessments are to be kept on file and reviewed annually in light of the current circumstances. An example of a completed risk assessment can be found in [Resource Documents - Appendix 5](#)

The risk of harm to children and/or the vulnerable can be reduced by:

- ensuring that activities support the interests of children and the vulnerable;
- providing constant supervision by reliable and trained adults;
- knowing where such persons are at all times; and
- implementing appropriate risk mitigation strategies within the environment to keep people safe (e.g., installing glass windows into doors to provide for a line of sight into a particular space).

A checklist to assist with Identification of training needs for employees and volunteers can be found in the [Resource Documents - Appendix 6](#).

A practical checklist to assist with the planning of a special event or even a regular activity with children can be found in [Resource Documents - Appendix 7](#).

The completion of a planning checklist is imperative and in so doing, it is important to know who is in attendance at activities along with who has delivered and who has collected the child. In such circumstances, a sign in/sign out register is helpful. An example is found in [Resource Documents - Appendix 8](#).



### 2.3.1 Two Adult Rule

A well-regarded practice in activities involving children or the vulnerable is the application of the *Two Adult Rule*. This practice is often adopted by parish based St Vincent de Paul Conference members who undertake home visits.

This rule requires that wherever practical no fewer than two adults should be present at all times during any parish/agency sponsored program, event or ministry involving the vulnerable or children.

Furthermore, it is best that these two adults not be related.

#### **Why have this rule?**

Implementation of this rule:

- drastically reduces the risk of an incident of abuse (potential abuser will lose interest if they are constantly in sight of another adult);
- protects the adults against false allegations;
- reduces the possibility of a claim of negligence;
- increases the likelihood that parents and adults will volunteer to lead as they know they will have help on a regular basis;
- provides help if there is an accident or emergency; and
- sends a clear message to the person being supported that they are important and valued.

In essence, this practice serves to keep not only children and the vulnerable safe but also the adults serving them.

#### **What do we do if we are a small parish and have a hard time finding even one adult to volunteer for activities involving the vulnerable or children?**

Paucity of resources does not mean an abandonment of ministry activity and/or support of our members of Christ's community. Nonetheless, thought has to be given to how associated risks can be minimized by adopting measures such as:

- assigning an adult roamer who randomly might visit and/or participate as an additional helper in a known activity involving the vulnerable or children; and/or
- making use of any available open space (e.g., leaving doors open; meeting outside in the open, modifying premises by inserting a glass window in the doors of a meeting room).

Some Diocesan workers including Centacare counsellors, Catholic Education teachers and guidance officers also would find this two adult rule impractical given the nature of their one-on-one work with children and the vulnerable. While risks need to be minimised, it is acknowledged that the inherent requirements of their roles might prohibit the application of this rule.

### 2.3.2 Social Media

'Social media' is the term commonly given to web-based tools that allow users to interact with each other in some way – by sharing information, opinions, knowledge, and interests online. As

the name implies, social media involves the building of online communities or networks to encourage participation and engagement.

The underpinning principle for use of social media by Church personnel is Christ-centred love for others and respect for human dignity, both on-line and off-line, in both private and professional life.

Users of parish/agency networks also have a duty of care to maintain network security and are required to adhere to accepted policies and procedures for the professional use of electronic mail (Email) and the Internet.

This includes, but is not limited to:

- duty of care;
- ethical and appropriate use;
- the need to maintain privacy, confidentiality and the rights of individuals and copyright owners;
- cost-efficient use of the information services;
- adherence to considered and appropriate records management practices;
- appropriate use of systems, accounts, and passwords;
- compliance with the [‘Social Networking Protocol for the Catholic Church in Australia’](#) as issued by the Australian Catholic Bishops Conference.

Behaviour must comply with legislation not only prohibiting anti-discrimination and/or harassment but also provisions such as found in the following:

- [Intellectual Property Laws Amendment Act 1998](#)
- [Privacy Act 1988](#) and Privacy Amendment (Enhancing Privacy Protection) Act 2012
- [Electronic Transactions Amendment Act 2011](#)
- [Copyright Act 1968](#)

**SECTION 3:  
DISCLOSURE ACTIONS REQUIRED IN THE  
CASE OF INCIDENTS/CONCERNS OF ABUSE  
OR HARM (MANAGEMENT OF HARM AND  
ABUSE)**

The Diocese of Toowoomba expects that all concerns, allegations, suspicions and disclosures of abuse are taken seriously. It is critical that employees and/or volunteers know what is expected of them in these circumstances.

All reporting of allegations is highly sensitive and should be dealt with in a sensitive and confidential manner with respect for the privacy of the individual.

**The benefit of the doubt will always be in favour of the victim or the one reporting the harm.**

Catholic Education Diocese of Toowoomba staff must follow their Student Protection Processes and observe all requirements of mandatory reporting as required in the *Education (General Provisions) Act 2006*. The *Education (Accreditation of Non State Schools) Act 2001* and associated regulations and the *Child Protection Act 1999* (as amended 2014).

The legislative requirements that govern areas of service delivery and reporting protocols (e.g., Child Safety in Centacare and Aged Care in Lourdes Home for the Aged) also must be adhered to at all times. In the absence of such protocols, parishes and other agencies and/or ministries will follow this policy and associated procedures.

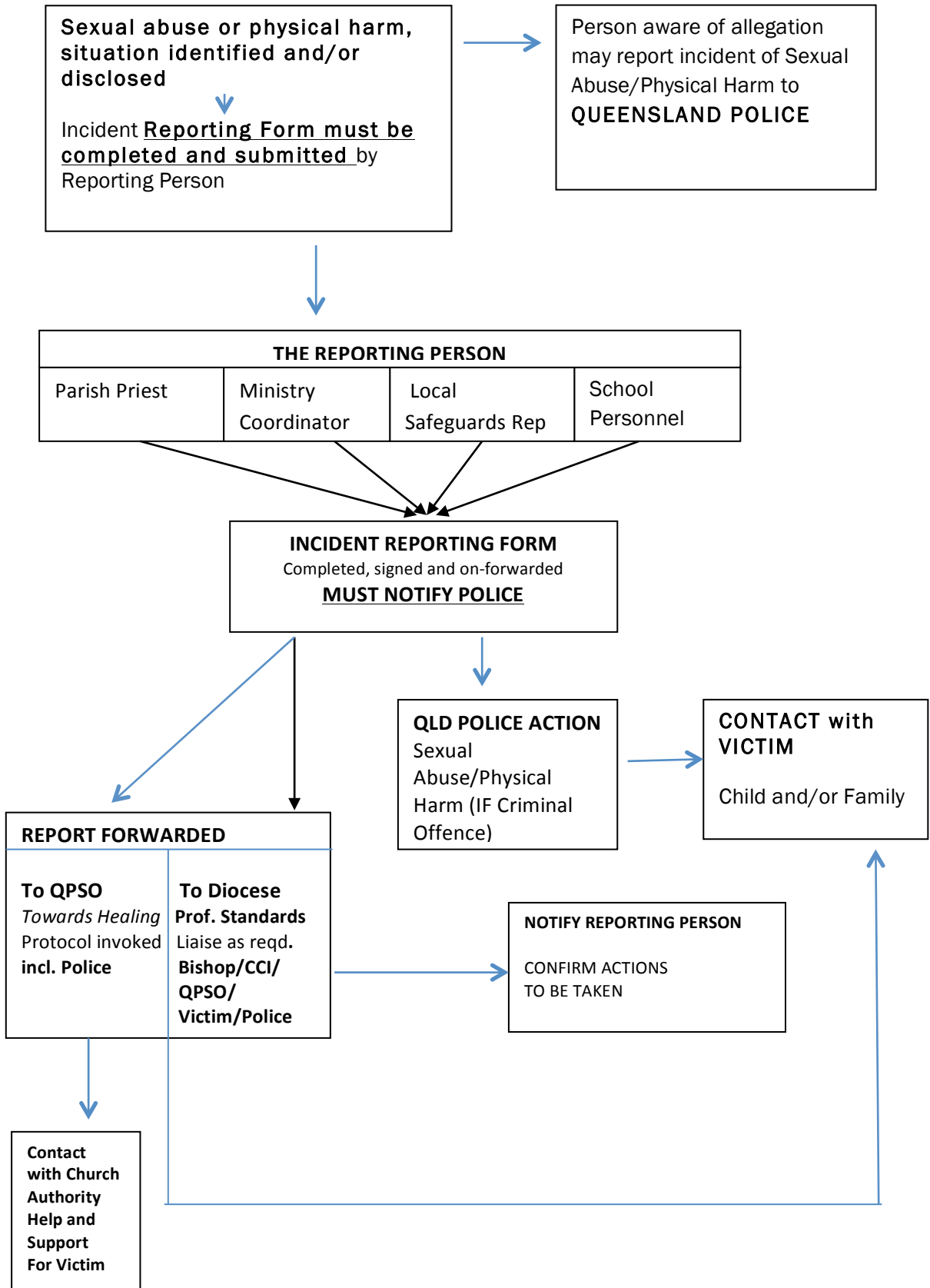
As required, harm or suspected harm cases will be reported to the Bishop of Toowoomba and/or the Diocese's Executive Officer – Professional Standards.

Set out below is the action that must be taken if any concern or suspicion arises, or an allegation or disclosure is made, whether current or historical, that indicates a Church employee/volunteer worker/parishioner (current or former) has:

- behaved in a way that has harmed a child, or may have harmed a child;
- committed a criminal offence against a child or related to a child; or
- behaved towards another person in a way that indicates s/he is unsuitable to work with children or the vulnerable.

The following schematics illustrate the procedures to be followed in the event a member of the Clergy, Religious, Church employees, Volunteers, and/or Students on Placement witness or form a belief that sexual abuse or some other form of physical or psychological harm/abuse has occurred involving a child or vulnerable adult.

**ACTION REQUIRED – IF/WHEN SEXUAL ABUSE and/or PHYSICAL HARM SITUATION ARISES**



**ACTION REQUIRED – FOR OTHER FORMS OF ABUSE/HARM**

**Neglect, financial/emotional abuse /harassment situation is disclosed**  
 Reporting Person **must**

- LISTEN
- ACKNOWLEDGE CONCERNS
- COMPLETE REPORTING FORM
- INFORM THE DIOCESE (PROFESSIONAL STANDARDS)

Person aware of allegation may report incident (e.g., Dept. Communities, Child Safety, Disability Services; Adult Guardian; Police)

<b>THE REPORTING PERSON</b>			
Parish Priest	Ministry Coordinator	Local Safeguards Rep	School Personnel

**INCIDENT REPORTING FORM**  
 FORMS BASIS OF DISCUSSION

**DISCERN COURSE OF ACTION**

DIOCESE + REPORTING ENTITY/PERSON TOGETHER

**DIOCESE (PROF. STDS.)**

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VALIDATE

FORMAL INVESTIGATION

REMEDIAL ACTIONS AND/OR OUTCOMES IDENTIFIED  
 incl. NOTIFY RELEVANT AUTHORITY

**(Circumstances will dictate)**

**AS REQUIRED NOTIFY RELEVANT AUTHORITY**  
 (e.g., Dept. Communities, Child Safety, Disability Services; Adult Guardian; Police)

CONTACT with  
 VICTIM

**NOTIFY REPORTING PERSON**  
 CONFIRM ACTIONS TAKEN  
 "FEEDBACK" as required

## **Note:**

Whether a child protection concern involves an active member of the faithful or not, it is still the responsibility of everyone in the Church (and its agencies) to make a report to ensure that children and the vulnerable who may need help and protection are not left at risk of abuse.

Reasonable grounds to suspect harm and to invoke reporting procedures include:

- a child or vulnerable individual discloses they have been harmed;
- someone else (e.g., family member of the vulnerable person, another child, parent or carer) discloses that harm has occurred or is likely to occur;
- a child or vulnerable individual discloses harm to their peer or acquaintance (it may be possible they are referring to themselves) who then passes this detail forward;
- significant changes in the behaviour or the presence of new unexplained and suspicious injuries on a child or a vulnerable person; and/or
- Directly witnessing actions that a reasonable person would deem to be harmful.

Safeguarding Reporting Procedures are summarised again in [Resource Documents - Appendix 9](#).

Whilst reporting is of paramount importance, professional discernment may indicate that children or the vulnerable who are the victims in such situations should be referred for counselling support. The Centacare Toowoomba office is well placed to provide such services.

The approval for such counselling support would need to be made by a responsible person in charge of parish, agency or ministry. Dependent on circumstances, such decisions also may involve consultation as needed with the person who reported the incident; the Office of the Queensland Director of Professional Standards and/or members of the Diocese's Professional Standards and Safeguards Committee.

### 3.1 PROTECTION FROM CIVIL LIABILITY

Legislation (for example, Section 22 of the Child Protection Act 1999) provides for protection from civil liability for persons who, acting honestly and reasonably, notify or give information about suspected harm to a child. Furthermore, and in accordance with accepted Government whistleblower practices, the Diocese of Toowoomba would support the reporting of improper behaviour and the protection of individuals who conscientiously make such disclosures concerning children or vulnerable adults.

### 3.2 REACTIONS IN THE EVENT OF SUSPICION OF HARM

Where there is a suspicion that a child or a vulnerable person is being harmed physically, sexually or emotionally, the following checklist guides your behaviour in responding to the disclosure:

- Listen;**
- Affirm;**
- Don't blame** – *'This is not your fault.'*
- Support** – *'Thank you for telling me, you are very brave.'*

- Safety** – *'I'm sorry this happened to you. I'll do everything I can to keep you safe. I will have to speak to other people in order to help'*;
- Document** – after speaking with the person make your own notes of the conversation. Ensure that the disclosure is recorded as fully as possible on the Safeguarding Children Recording Form (Appendix 10);
- Act** - report according to the Safeguarding Children Reporting Procedure below.

Record all details that support the suspicion. An Incident Recording Form can be found in Resources [Documents - Appendix 10](#). The record should be completed as soon as possible after becoming aware of an incident; signed; and, dated by the person filling in the form.

The record also would normally include:

- identifying information as far as it is known and as accurately as possible relaying only what one has seen or heard. This should include the name and address of the person who has raised the concern (as well as their date of birth, and parents'/carer's names and addresses when the person who has raised a concern/allegation is a child);
- the name of the individual against whom the concern/allegation is being raised and any other identifying information;
- as much information as possible about the circumstances that led to the concern/allegation being raised, why is the person reporting worried about the welfare and safety of the child or the vulnerable person ;
- dates when the concern arose, or when the incident(s) occurred;
- circumstances in which the concern arose, or the incident(s) occurred;
- any explanation offered to account for the risk, injury, or concern;
- the victim's own statement using the words they actually used to describe the events or incident(s), if possible. Do not make assumptions about the intended meaning of words used;
- details of any action already taken concerning the incident/concern/allegation; and
- any views expressed - by other family members, carers, parent(s) or guardian(s) about the matter.

In your recall of events, do not be selective. Include detail that may to you seem irrelevant. Such information may prove very useful should a subsequent investigation be deemed necessary.

At a later stage in an investigation, all records, including rough notes will be passed to the relevant designated officer within the Diocese (e.g., the Executive Officer – Professional Standards). As required, such written records also may be passed to the Police and/or the Diocese's legal advisers. In the case of sexual abuse/assault these records and notes also will go to the Director of Queensland's Professional Standards Office.

At all stages of a complaint of abuse and/or harm, any copies of records retained must be stored in a secure manner to maintain confidentiality.

It is important not to discuss the incident/concern with anyone other than those mentioned above.



### 3.3 MANAGING DISCLOSURE: POINTS TO REMEMBER

The following points inform your approach when a person discloses harm or abuse by someone else:

- Listen carefully to and support the child or vulnerable person and thank them for helping you to understand.
- Reassure the person it is right to tell someone about this.
- Don't be afraid of saying the 'wrong' thing.
- Give the person your full attention.
- Let them take his/her time in telling you the story.
- Let the person use his/her own words.
- Accept that such a child or vulnerable person will disclose only what is comfortable and recognise the bravery/strength of the person for talking about something that is difficult.
- Maintain a calm appearance with a listening style that is compassionate and reassuring. If the information given to you shocks, disgusts, or distresses you, do not allow these feelings to show. Such a reaction may inadvertently dissuade the person from giving any further information. **(If you are upset, reassure the person that you are not upset with them but with the fact that such things can happen).**
- Explain to the person what you intend to do next.
- Do not make promises you can't keep.
- Do not confront the accused.
- Record all details that support your concerns.
- Inform your Local Safeguarding Representative, Parish Priest or Ministry Coordinator and decide what action is to be taken. In the event that the accused is one of these role holders, contact the Bishop's Professional Standards Office.
- As appropriate or required, ensure reports are passed to the appropriate authorities including the Police, Department of Communities, Child Safety and Disability Services, <http://www.communities.qld.gov.au/childsafety/protecting-children/reporting-child-abuse>. Or Adult Guardian.
- Any transfer of information should be marked CONFIDENTIAL and should be made available only to relevant personnel.
- Do not undertake an investigation. This should be undertaken by the relevant authorities in accordance with the Diocese's Policy.

When there is a disclosure of an allegation of abuse and/or harm, only ask questions to confirm your understanding of the victim's situation and/or what might need to be reported to an appropriate authority.

When an employee, volunteer or parishioner witnesses or receives an allegation of harm and/or suspected harm, they must immediately report it to their Parish/Agency Supervisor, Priest Director or Parish Priest. If the allegation involves the immediate supervisor, take up the matter with the next most senior position holder. If a Priest, an agency's most senior executive or a Pastoral Leader is the alleged perpetrator, contact the Bishop of Toowoomba or his Executive Officer – Professional Standards in the first instance.

Further investigation and/or follow-up on this information may be required before an assessment of the situation and reporting requirements can be determined.

In situations where there is uncertainty, questions or concerns regarding the reporting of an allegation of harm, clarity will be sought from officers with the relevant expertise within Department of Communities, Child Safety and Disability Services, the Police or the Adult Guardian's Office. This can be undertaken with the assistance of the Diocese's Executive Officer – Professional Standards.

**Suspicion or allegations of harm that involve a criminal offence must be reported to the police.** They will undertake any necessary investigation.

When it is alleged that an employee or a volunteer is the perpetrator of harm against a child or a vulnerable person, the employee or volunteer will be stood aside from their normal duties until the allegation is investigated and/or resolved. Any such actions must be taken in a considered manner and taking into account accepted employment practices, laws and/or industrial agreements.

If the allegation is reasonably proven and/or probable, the employee's or volunteer's employment will be terminated immediately. In the course of making such a decision, legal or Para-legal advice from an industrial relations practitioner should be obtained.

Any further response to those proven guilty of abuse will be in line with Part Two Sections 27, 28 and 29 of *'Towards Healing'*.

### 3.4 DOCUMENTING THE DISCLOSURE

Notes must be taken when a disclosure is being made. Use the [Resources Documents - Appendix 10](#) Safeguarding Children Recording Form and guidelines as outlined in this section.

It is important to ensure that the child or vulnerable person is aware that documentation is or will occur and understands its importance. The explanation should be appropriate to the age and level of understanding of the person involved. If in completing the form, assistance is required, please refer to the [Contacts](#) Listed in [Resources Documents - Appendix 11](#).

In completing the Recording Form:

- Do not be selective. Record the actual comments/details as given to you. Include detail that to you may seem irrelevant. It may prove useful at a later stage in an investigation. All records, including rough notes must be passed to the appropriate persons including the Executive Officer –Professional Standards.
- Any copies of records retained must be kept secure and confidential.

An allegation involving children must be reported to the Department of Communities, Child Safety and Disability Services when:

- The alleged case of harm may be caused by a family member.
- The family is not acting to protect their child from harm.
- Disclosure of harm is related to shared family care.
- Disclosure of harm is related to residential services for a child.

**Disclosure of harm that indicates a criminal offence has taken place (for example, sexual or physical assault) must be reported to the Police.**

The Police will require the following details:

- the disclosure of harm;
- name, age and address of the child or person harmed;
- whereabouts of the child or person at that point in time;
- any identifying information of the alleged perpetrator; and
- details of the person reporting the harm.

Employees and/or volunteers who have been involved with disclosure and suspicion or allegation of harm can be debriefed and supported through the Centacare Toowoomba and its Employee Assistance Counselling Program – Phone [1300 477 433](tel:1300477433)

### 3.5 CONFIDENTIALITY

The circumstances surrounding suspected or alleged harm and/or abuse to children and the vulnerable are highly sensitive and must be treated in such a way. Any reports or documentation on disclosures must be kept secure at all times and only passed to appropriate authorities and/or individuals. Access should be strictly limited to those involved in the matter. The matter should only be discussed with relevant supervisors, managers or staff.

When disseminating such sensitive personal information, reasonable steps must be taken to protect personal information from the risk of unauthorised disclosure. Dependent on circumstances, the measures that might apply will include:

- redacting the identity of the complainant and any identifying information in any written material disseminated;
- delivering written material by hand to the intended recipient (rather than an email) in a sealed envelope marked “private and confidential”;
- ensuring that **ONLY** the people who really need to be involved in any decision making process relating to the sensitive information are provided with copies of the relevant documents; and
- if (and only if) sharing the identifying information is necessary (for example, for investigatory purposes), then ideally such information should be disseminated in person rather than in writing to reduce the risk of disclosure of the information.

If documents provided within the Diocese contain identifying information, then steps must be taken to destroy or permanently de-identify the information if it is no longer required. At all times the purpose for the disclosure must be kept in mind and once the purpose has been served the information ought to be destroyed. For example, participants in a meeting dealing with a sensitive case should return copies of background relevant personal information used in such meetings and these should be shredded or otherwise destroyed.

Any electronic copies of documents always should be securely stored with restricted access.

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