

ARCHDIOCESE OF BRISBANE

COMPLIANCE AUDIT REPORT RECOMMENDATIONS
8 SEPTEMBER 2016

FINAL REPORT



Most Rev Mark Coleridge
Archbishop of Brisbane
GPO Box 282
Brisbane Qld 4001

Your Grace,

We have completed our audit of compliance with the policy for "Safeguarding Children and Vulnerable Adults" for the Archdiocese of Brisbane ("Archdiocese") for the period ended 30 June 2016. Our compliance audit report in respect of our audit is enclosed for your reference.

In accordance with our professional responsibilities, we have detailed in this report certain matters and recommendations that we consider should be brought to your attention.

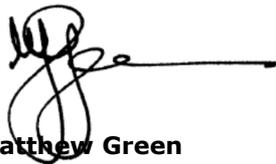
In the accompanying schedules, we make 12 recommendations for consideration by the Archdiocese. Some of these recommendations will be comparatively easy to implement, indeed one has already been actioned by the Safeguarding Team. However, some of these recommendations may necessitate considerable planning and investment and we offer these types of recommendations as longer-term solutions to some of the weaknesses we observed during our audit (e.g., application of technology solutions to documentation issues).

We would like to take this opportunity to extend our appreciation to you for the opportunity to work with the Archdiocese on this important project and for the assistance of the dedicated staff and volunteers of the Archdiocese that we encountered during our audit.

We would be pleased to discuss with you any matters mentioned in this report.

Yours sincerely

HANRICK CURRAN AUDIT PTY LTD



Matthew Green
Director

8 September 2016

RECOMMENDATIONS

INTRODUCTION

In accordance with our normal practice and our professional and ethical standards we take this opportunity to communicate with you certain matters concerning the conduct of our audit procedures and matters that came to our attention during the provision of our services.

Included below are our comments in respect of the implementation of the Policy in the parishes of the Archdiocese. We consider that these matters will provide an opportunity for improvements in implementation of the Policy in the Archdiocese.

We have been engaged by the Archdiocese of Brisbane to undertake an audit of the activities of the Archdiocese with the objective of assessing the compliance of parishes with the policy and strategies of the Archdiocese for the "Safeguarding Children and Vulnerable Adults Policy" (the "Policy"), version 2.0 as issued January 2015.

We note that the Archdiocese has released an updated version of the policy, version 2.2, effective from July 2016. We have reviewed version 2.2 of the Policy and its accompanying Strategies and resource material and consider that this material will be beneficial to the implementation of the aims of the Policy.

In respect of our audit inspections, we make the following observations.



RECOMMENDATIONS

1. DOCUMENTATION & RECORD KEEPING

- 1.1. As noted in our "Report on Compliance of the Archdiocese of Brisbane with the Requirements of the Policy for Safeguarding Children and Vulnerable Adults" (dated, 8 September 2016), we identified weaknesses in recording keeping that were common among the parishes visited during the audit program.
- 1.2. Documentation weaknesses were observed in a number of areas, including in respect of:
 - a) Preparing and recording interview questions and responses for the appointment of key volunteers and parish staff.
 - b) Preparing and retaining risk assessments for parish activities that involve children and vulnerable adults.
 - c) Issuing, recording and retaining volunteer acceptance of the Code of Conduct of the Archdiocese.
 - d) Documenting and retaining training records for the parish volunteers.
 - e) Issuing and recording publication of the details regarding the Policy in the parish newsletters.
- 1.3. We accept that the Policy does not mandate any of the above matters and that these items disclosed above are resources contained within the Policy and Strategies that assist a parish in ensuring compliance with the Policy.
- 1.4. We **RECOMMEND** consideration of operational strategies that can work to improve the documentation and record keeping across parishes in the Archdiocese. Such strategies might include:
 - a) Preparation of a standard "safeguarding" folder for use in each parish. Such a folder could be prepared with sections to cover each of the required areas in which records can be maintained to show compliance with the Policy.
 - b) Implementation of a dedicated "Safeguarding" element in the parish provided Parish Administration and Communication System ("PACS") software.
 - c) Development of mobile technology based solutions to resolve the issues noted during the audit.



RECOMMENDATIONS

2. INCONSISTENT DEFINITION OF VOLUNTEER & APPLICATION OF REQUIREMENTS

- 2.1 During our compliance visits, we noted an inconsistent definition of the term "Volunteer" resulting in differences of interpretation as to who would be covered by the requirements of the Policy. The Policy provides for diversity in application and does not define the role of volunteer.
- 2.2 For example, the following are some examples of the definition that we encountered in practice:
- a) All persons contributing to the parish in an unpaid manner were required to obtain a Blue Card and complete all of the relevant volunteer documentation included in the Strategies and supporting Resource Documents.
 - b) Volunteers were taken to mean only those persons contributing to the parish in an unpaid manner, outside the Mass / Liturgy, and these persons were required to obtain a Blue Card and complete the volunteer documentation.
 - c) Volunteers were taken to mean only those persons involved in the parish who would have involvement with Children and Vulnerable Adults. As a result, the preparation of volunteer documentation was only required for these persons (as well as a Blue Card). Examples of persons excluded from the need to complete volunteer forms in this example included those persons involved in the ministry of driving parishioners to church each week.
- 2.3 We accept that each parish will have a different approach to the requirements of the Policy, however, we understand that the Archdiocese is working to minimise the risk of harm to Children and Vulnerable Adults throughout the Archdiocese.
- 2.4 We **RECOMMEND** that as the minimisation of harm is the goal, the Archdiocese should work to ensure a consistent and wide application of the Policy through the implementation of a wide definition of volunteer for the purpose of the Policy.
- 2.5 We **RECOMMEND** that the Archdiocese define the term "volunteer" in the Policy revision that is identified in version 2.2 as being due in January 2017.
- 2.6 We **RECOMMEND** that the Archdiocese clarify the requirement for application of the Policy and preparation of relevant forms from the Resource Document



RECOMMENDATIONS

3. INCONSISTENT DOCUMENTATION FOR VOLUNTEERS

- 3.1 Our inspections identified inconsistency in the preparation and documentation retained for each volunteer. For example, each parish established a register of volunteers, however, each register was developed independently (but based on the guide in the Resource Documents) and accordingly each parish was using a different implementation of the volunteer register. Another example is that each parish had different approaches to retaining documentation around each volunteer acknowledging the Code of Conduct for the Archdiocese.
- 3.2 We **RECOMMEND** that minimum documentation standards for volunteer appointments are specified in the Policy and that the use of example records included in the Resource Documents are mandated in the Policy.
- 3.3 We **RECOMMEND** that the PACS system be considered for use as the system for keeping all relevant information in respect of volunteers and that if appropriate, that its use by parishes be mandated.

4. AWARENESS AND ADVERTISING OF POLICY

- 4.1 Our inspections identified that in some parishes there had not been any significant advertising of the existence of the Policy or an appointed safeguarding representative, either by the display of the Policy statement in Church properties or by inclusion of relevant information in the parish newsletter.
- 4.2 We also noted that most parishes displayed the Policy Statement provided by the Archdiocese in at least some of the meeting rooms in the Church property, however, we did determine that the Policy was not displayed at every church we visited or in each property in each parish.
- 4.3 We accept that the Policy does not mandate the requirement for the parish to display or publish such information.
- 4.4 We **RECOMMEND** that the Policy be amended to require the publication of specific information regarding the Policy in a defined timeframe.
- 4.5 We **RECOMMEND** that the Policy be amended to require the display of specific information concerning the Policy in each Church property.



RECOMMENDATIONS

5. APPOINTMENT OF SAFEGUARDING REPRESENTATIVE

- 5.1 Our inspections identified an inconsistent approach to the appointment of a safeguarding representative in each parish.
- 5.2 In four of the parishes visited, the safeguarding representative was also the parish administration officer.
- 5.3 In two of the parishes visited, the safeguarding representative had been appointed by the parish council, or a council of parishioners had been formed to address the implementation of the Policy.
- 5.4 We consider that the use of a parish employee to act as the safeguarding representative provides a convenient resource who is also able to address the many time-consuming paperwork requirements that arise from the Policy. However, we question whether the use of a parish employee as a safeguarding representative provides for the best framework for the mitigation of risk.
- 5.5 We **RECOMMEND** that the Archdiocese consider the requirements for appointment of a safeguarding representative. Where the safeguarding representative is also a parish employee, we suggest that a second volunteer also be appointed as a joint safeguarding representative so that the parish is served by two safeguarding representatives.

6. PROFESSIONAL DEVELOPMENT COORDINATION

- 6.1 Our inspections identified that parishes reported difficulty in coordinating training for volunteers in the requirements of the Policy. These difficulties were reported to arise from a lack of information regarding safeguarding training being held in proximity to the parish.
- 6.2 We also identified that parishes generally lacked adequate records regarding the attendance of volunteers at training sessions for safeguarding requirements.
- 6.3 We **RECOMMEND** that the PACS system is used for the tracking of safeguarding training and that training records be updated from the Human Resources Office of the Archdiocese, directly into the PACS system.
- 6.4 We **NOTE** that our recommendation for the coordination of a training calendar has already been actioned by Mr Tornabene in his role as the Safeguarding Officer for the Archdiocese.



RECOMMENDATIONS

7. DEALING WITH HARM

- 7.1 Our inspection process included asking the parish safeguarding representative how they would respond to a situation in which they were provided with disclosure regarding harm to a child or vulnerable adult. These questions were designed to test the understanding of the safeguarding representative in dealing with circumstances of harm and the knowledge of the safeguarding representative in the requirements of the Policy.
- 7.2 At one parish, a suspicion of harm had been identified, documented, investigated and resolved in accordance with the requirements of the Policy.
- 7.3 We had the opportunity to sight the documentation of the matter, but have not reviewed the investigation or the matter to determine whether it was adequately dealt with as this work was outside the scope of our engagement.
- 7.4 At the other five parishes we visited, we noted that all safeguarding representative had only a basic understanding of the requirements for dealing with disclosure and felt that in a real situation, they would need to refer to Archdiocesan resource material to determine how the matter should be dealt with.
- 7.5 We **RECOMMEND** that further training be provided to the safeguarding representatives in the execution of the requirements of the Policy.



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Based in Brisbane, South East Queensland, our client's operations extend throughout Australia, including in Northern NSW, Western Queensland, Sydney, Melbourne, Darwin, Townsville and Mackay, as well as other regional areas.

Hanrick Curran are a member firm of the international Alliot Group, which is a worldwide alliance of independent firms that combine to work on engagements and who refer work where local knowledge is a requirement.

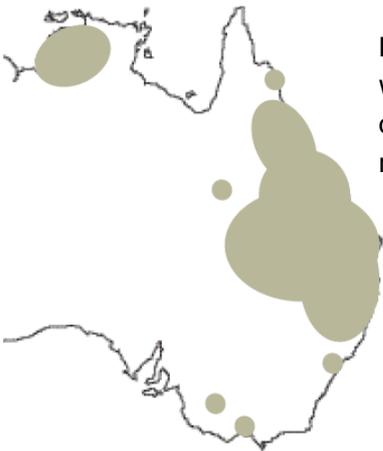


Figure - Hanrick Curran's Client's Operational Range

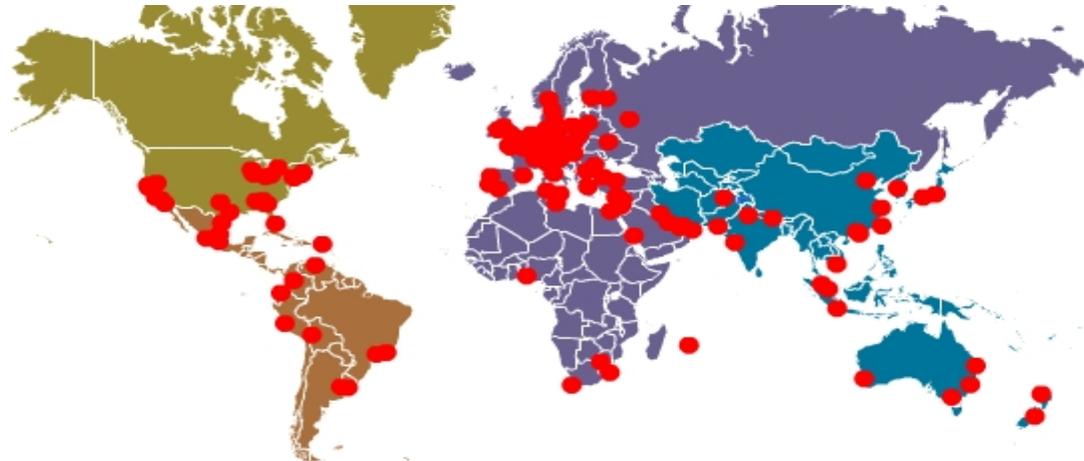


Figure - Alliot Group World Wide Members

