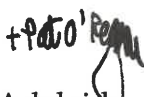




Catholic Archdiocese of Adelaide
Integrity and Safeguarding
Department

**Archdiocesan Offices, Multicultural
Communities, and Parishes**

**Safeguarding Complaints and Reporting
Policy**

Approved by: 
Archbishop of Adelaide

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Archdiocesan Vision Statement

The Catholic Archdiocese of Adelaide strives to be a welcoming, Christ-centred community of Believers serving others. As missionary disciples, we are committed to building up the Body of Christ by listening, discerning and growing in the Spirit, journeying together.

Archdiocesan Mission Statement

As followers of Jesus, loved by God, nurtured and formed in community we are called to be: Sharers of faith, hope and love Builders of bridges Healers of broken relationships Agents of transformation in our world

Statement from the Archbishop

The Catholic Church in Australia and the Catholic Archdiocese of Adelaide acknowledge with great sorrow the hurt caused by the past abuse of children within the Church and the lifelong impact of this abuse upon victims, survivors, their families, and the community. The Church also deeply regrets past failures to believe and support children and to respond appropriately with a protective focus. In this spirit, the Archdiocese is committed to addressing the wrongs of the past through the provision of a just, respectful, and compassionate response to victims and survivors of historical abuse. Importantly, the Archdiocese is committed to fostering a culture of safety and care for all children and adults and to the prevention of child or adult abuse from reoccurring in the future.

Policy Vision

The Archdiocese seeks to build a family-centred Church, strengthening community, and spreading the good news of Jesus Christ, with a particular concern for those who are poor, at risk, or disadvantaged.

The Archdiocese is committed to the safeguarding of all which reflects Gospel values in providing children, families, and individuals with a welcoming, nurturing, child and adult-friendly environment, free from risk of harm.

The Archdiocese has zero tolerance for all forms of abuse and strives to provide safe environments for all.

Commitment

The Catholic Archdiocese of Adelaide is committed to the care, wellbeing, and safety of children, young people, and adults (including Adults at Risk) and to the nurturing of deep cultures of safety across the Archdiocese. The Archdiocese has zero tolerance

for all forms of abuse and prioritises the safety and wellbeing of children, young people, and Adults at Risk.

Purpose

The purpose of this policy is to establish a comprehensive overarching framework for the effective management of complaints, grievances, and reports of alleged abuse or misconduct within Archdiocesan offices, parishes, and multicultural communities of the Archdiocese by Archdiocesan personnel.

This policy supports the Archdiocese to progress its commitment to nurturing cultures of safety by providing clear objectives, principles, and clarity regarding roles and responsibilities for the reporting and management of alleged abuse, harm, and misconduct.

In doing so, this policy highlights the importance of analysis and feedback in complaints management and the contribution this can make to enhancing the work and ministry of the Archdiocese, as well as in maintaining compliance with national standards and legislative obligations. In this way, complaints management is a key component in the prevention of abuse and harm, effective risk management, and the fostering of continuous improvement.

Scope

This policy applies to:

1. All complaints, grievances, disclosures, and reports related to the alleged abuse, harm, or grooming of children, young people, and adults at risk, including parishioners, in parishes, Catholic communities, multicultural communities, and diocesan offices of the Archdiocese by clergy, members of religious orders, employees, and volunteers
2. Complaints of misconduct involving adults, such as staff or volunteers, toward adult parishioners
3. All reports of alleged misconduct and breaches of the Codes of Conduct, such as bullying, harassment, and other boundary violations towards children, young people, adults at risk, and parishioners in parishes, Catholic communities, and multicultural communities of the Archdiocese by clergy, members of religious orders, employees, and volunteers
4. Archdiocesan clergy, members of religious orders, employees, and volunteers
5. Reports that are contemporary, recent, and historical.

This policy does not cover employee-related professional misconduct or unprofessional behaviour that falls out of the scope of alleged abuse of children or adults at risk. Such misconduct may be represented by, for example, allegations of employee-to-employee bullying or harassment, confidentiality breaches that are not

related to safeguarding, or alleged financial improprieties by employees. These matters are managed by the Human Resources Department of the Archdiocese.

This Safeguarding Complaints and Reporting Policy operates alongside the Archdiocese’s Code of Conduct, Human Resources Grievance Policy and other relevant procedures. Where a complaint falls outside the scope of safeguarding (e.g. employee-to-employee workplace grievances), the matter will be managed under the Archdiocesan grievance process.

Objectives

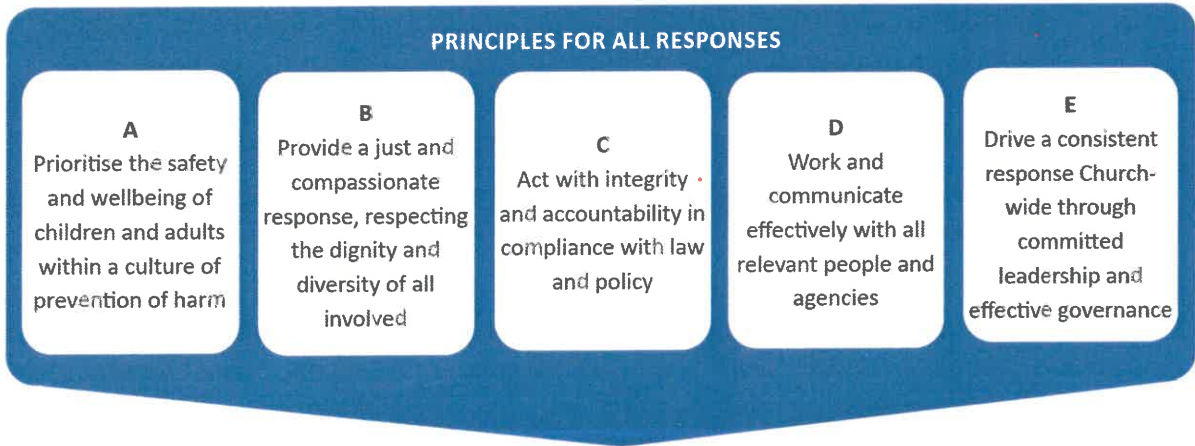
The objectives of this policy are:

- 1. To provide a safe, respectful and transparent avenue for complaints to be raised, listened to and responded to appropriately.
- 2. To further the Archdiocese’s commitment to prioritising the safety of children, young people, and adults at risk.
- 3. To facilitate continuous improvement of safeguarding policies, programs and practices.

Principles

The implementation of this policy, and its related procedures, is underpinned by principles related to safeguarding and safeguarding complaints management. The Archdiocese is committed to upholding these principles in all responses to safeguarding related complaints and reports. All personnel of the Archdiocese involved in safeguarding complaints and reporting matters, including clergy, members of religious orders, employees, volunteers, and parishioners are required to abide by and uphold these principles.

Key required principles include those stipulated in the National Response Protocol as follows:



The management of safeguarding complaints in the Archdiocese is also underpinned by the following Archdiocesan safeguarding and complaint management principles:

1. Zero tolerance and the primacy principle

The Archdiocese maintains a strict zero-tolerance policy regarding the abuse of children, young people, and adults at risk. The safety of children, young people, and adults at risk is prioritised in ministry, programs, and decision making. The Archdiocese is also committed to ensuring the inherent dignity of those coming forward with complaints is acknowledged and respected.

2. Respect for rights and empowerment

Children, young people, and adults at risk have the right to have a say, to be listened to, to contribute to decisions that affect them, to be involved in the complaints process, to be kept informed, and to have their concerns treated with seriousness and respect.

The Archdiocese fosters an environment where children, young people, and adults at risk know their rights, are empowered to speak up, and feel confident that their voices will be heard and not overshadowed by other more powerful individuals.

3. A client-centred and trauma-informed approach

The Archdiocese acknowledges it takes courage and strength to come forward with a complaint; with significant passages of time having elapsed in many cases. Where possible and practical the Archdiocese will manage safeguarding-related complaints with a trauma-informed and client-centred approach. These principles recognise the psychological and emotional impact of abuse as well as the combined impact of trauma and power imbalances upon memory, disclosure, and recall. The Archdiocese will strive to provide victims and adult survivors of abuse who come forward with trauma-informed support and care.

4. Power Imbalances

The Archdiocese recognises that power imbalances can exist in pastoral and parish relationships, especially between clergy and parishioners, and between adults and children, and that these imbalances can create significant barriers to disclosure, reporting of abuse, timing of disclosure, and recall. Despite these power imbalances, it is acknowledged that children, young people, adults at risk, and adult survivors of abuse are entitled to and capable of actively contributing to the complaints process and its resolution.

5. Leadership, collective responsibility, and duty of care to protect children and young people

Safety is a collective responsibility, and all clergy, members of religious orders, employees, volunteers, and parishioners are duty-bound to keep the children, and young people of the Archdiocese's parishes and multicultural communities safe.

6. Diversity, inclusion, and cultural sensitivity

Cultural sensitivity, understanding, inclusion, and respect for diversity are fundamental to the Archdiocese's safeguarding interventions. The Archdiocese

acknowledges that children, young people, and adults from marginalised backgrounds—including those with Aboriginal and Torres Strait Islander heritage, those from culturally and linguistically diverse backgrounds, those with disabilities, those in significant crisis, the frail aged, and individuals who are diverse in their gender or sexuality—are particularly vulnerable to abuse and require enhanced support. The Archdiocese is committed to empowering these groups by providing information about its safeguarding complaints and reporting processes in formats that are accessible and meaningful for different ages, cultures, abilities, and circumstances. The Safeguarding Complaints and Reporting Policy will be made available in Easy English, in community languages, and in alternative formats, upon request, to ensure it is accessible and understandable by all stakeholders.

7. Fairness, compassion, and integrity

All safeguarding complaints and reports are treated seriously with the safety and best interests of children, young people, and adults at risk as the paramount consideration.

Complaint processes are conducted with fairness, respect, and integrity while also being managed promptly and without preliminary judgment. The Archdiocese endeavours to provide a restorative, supportive, and compassionate process for all persons coming forward.

- All complaints will be acknowledged in writing within 3 business days of receipt.
- A preliminary risk assessment and case plan will be completed within 15 business days.
- A substantive update will be provided to the complainant on a regular basis and an outcome communicated within 60 business days of acknowledgement, unless extended by mutual agreement or unexpected circumstances which would be communicated to the complainant in a timely manner.

The Archdiocese is committed to procedural fairness and endeavours to provide a just process for all parties involved, including the person who is the subject of the complaint. The importance of pastoral care and support for respondents is also acknowledged.

All complaint processes are accountable, thorough, and sufficiently transparent to withstand external scrutiny.

8. Robust Risk Assessment, Investigation, and Canon Procedures

All complaints and reports relating to allegations of abuse or harm to children, young people, and adults at risk within the Archdiocese are subject to an initial risk assessment to identify and ameliorate risk to children, young people, and adult at risk. Ongoing risk assessments are thereafter conducted throughout the investigation process and over time with appropriate risk mitigation strategies applied as required. Where a complaint of sexual abuse against a

cleric or religious is substantiated under the civil standard, the Archdiocese will immediately implement the canonical protocols prescribed in Vos Estis Lux Mundi, including referral for preliminary canonical investigation (VELM Art 4) and the imposition of provisional protective measures (VELM Art 5).

Where a cleric or religious is convicted of a canonical offence relating to sexual abuse, they shall be prohibited from the exercise of any ministry or public pastoral role until the competent dicastery has issued and completed the canonical penalty procedures (in accordance with Vos estis lux mundi Art 5).

The Manager, Integrity and Professional Standards Team (or their delegated Case Manager or appropriate contact), will schedule and document formal review meetings with the respondent at least monthly while the investigation is underway and if the respondent remains in the workplace. Each meeting will assess compliance with safety agreements, evaluate ongoing risk factors, and review any pastoral support provided. Monitoring continues until the matter is formally closed.

9. Conflicts of interest and whistle-blower protections

Conflicts of interest are carefully identified and managed to maximise a fair and objective process, particularly when the subject of a complaint is a colleague or associate of the Archdiocese, and/or if that person holds, or has held, a position of authority in the Archdiocese.

All persons coming forward with a safeguarding complaint or report in good faith and with reasonable cause, whether it relates to an allegation of abuse or misconduct, or the administration of the Archdiocese's safeguarding policies and procedures, are protected, supported, and not adversely penalised. Support resources available and accessible to all persons include our: Employee Assistance Program (EAP), independent advocate, and external counselling service.

10. Confidentiality and privacy

All safeguarding complaints, investigations, and related records to complaints, reports, incidents, allegations, concerns, and referrals are managed with strict confidentiality and respect for privacy. All records are securely stored, protected, and retained in accordance with the requirements of the Privacy Act 1988 for a minimum of 50 years.

Legislative Framework

This policy is bound by the principles and legislative requirements of the following:

- The Children and Young Peoples' (Safety) Act 2017, South Australia
- The Privacy Act 1988, Commonwealth, as amended
- The Australian Privacy Principles

- National Redress Scheme for Institutional Child Sexual Abuse Act 2018

Policy Framework and Policy Alignments

This policy is one component of the Catholic Archdiocese of Adelaide's comprehensive approach to safeguarding. It is reflective of the National Catholic Safeguarding Standards (NCSS), with reference to:

- Standard 1: Committed leadership, governance, and culture
- Standard 4: Equity is promoted, and diversity is respected
- Standard 6: Effective complaints management
- Standard 7: Ongoing training and education
- Standard 8: Safe physical and online environments
- Standard 9: Continuous review and improvement

In addition, this policy is informed by and aligned to the requirements and principles of the following national and international bodies, policies, and structures:

1. Integrity in Our Common Mission
2. The National Response Protocol 2022
3. The National Redress Scheme
4. Vos Estis Lux Mundi 2023
5. The Universal Guidelines Framework: Tutela Minorum 2024

It is also aligned and should be read in conjunction with the following policies, frameworks, and procedures of the Archdiocese:

1. Safeguarding Children and Young People Policy
2. The Code of Conduct of the Catholic Archdiocese of Adelaide
3. Procedure for Responding to Child-Related Allegations or Suspicions of Harm by Clergy, Religious, Employees, or Volunteers
4. Safety and Wellbeing of our People Reporting Obligations
5. Best Practice Guidelines
6. The Safe Environments for All Framework (SEFA)
7. Screening Policy – Working with Children Checks

Key Roles & Responsibilities

Role	Responsibilities
The Integrity and Professional Standards Team (IPS Team)	<p>The Integrity and Professional Standards Team (the IPS Team) is part of the Integrity and Safeguarding Department of the Archdiocese. The Team is responsible for the oversight and delivery of assessment and protective responses to reports of alleged abuse or misconduct involving children, young people, and adults at risk across parishes, Catholic communities, and multicultural communities in the Archdiocese. Responsibilities include receiving, assessing, and responding to current and historical reports of alleged abuse or misconduct by clergy, members of religious orders, employees, volunteers, and parishioners. The role encompasses - review and assessment, oversight of investigations, application of risk assessments, and coordination of protective measures (incl safety agreements and other risk mitigation strategies as required). The Team provides professional advice and recommendations to the Executive Director Integrity and Safeguarding and requires compliance with the requirements of the National Redress Scheme, National Response Protocol, National Code of Conduct: Integrity in Our Common Mission, principles stipulated in this policy, together with the requirements stipulated in all complaints-related safeguarding procedures.</p>
The Archbishop's Consultative Panel (The Panel)	<p>The purpose of the Archbishop's Consultative Panel (the Panel) is to provide a central point of reference for the notification of high risk matters to the Archbishop regarding reports of alleged abuse, and misconduct, historical and current, by clergy, employees, and volunteers or any other person under the authority of the Archbishop. This includes reports pertaining to safeguarding allegations in parishes, Catholic communities, multicultural communities, schools, Centacare, and other Archdiocesan agencies. The Panel considers responses to civil litigation matters, and those relating to serious breaches of the National Code of Conduct: Integrity in Our Common Mission, or the Archdiocese's Code of Conduct. Investigations and responses under the National Response Protocol and those relating to the National Redress Scheme are also considered by the Panel.</p>

**The Executive Director,
Integrity and
Safeguarding**

The Executive Director, Integrity and Safeguarding plays a key role in safeguarding complaint management with responsibility for effective oversight of all complaint management processes undertaken by the IPS Team. This includes ensuring that all responses are compliant with the requirements of the National Response Protocol, the National Redress Scheme, the National Code of Conduct: Integrity in Our Common Mission, the principles stipulated in this policy, and the requirements of all complaints related policies and procedures of the Archdiocese. The Executive Director also chairs the Archbishop's Consultative Panel and is responsible for the provision of best practice safeguarding advice to the Panel, the Vicar General, and the Archbishop.

**Manager, Integrity and
Professional Standards
Team**

The Manager, Integrity and Professional Standards is responsible for operational oversight of all responses to safeguarding complaints and reports in parishes, Catholic communities, multicultural communities, and diocesan offices of the Archdiocese. These include responses to complaints, notifications, and reports received directly from victims and survivors of current or historical abuse, or those received via the National Redress Scheme, and/or the civil courts. The Manager is responsible for ensuring that all responses to complaints and reports are compliant with the principles and requirements of the National Response Protocol, the National Redress Scheme, the National Code of Conduct: Integrity in Our Common Mission, the principles stipulated in this policy, and the requirements of all complaints related policies and procedures of the Archdiocese. The Manager is also responsible for the provision of best practice safeguarding advice regarding Persons of Concern management to the Executive Director.

**Integrity Officer
Integrity and
Professional Standards
Team**

The Integrity Officers of the IPS Team is responsible for the assessment and case management of complaints and reports relating to alleged abuse or misconduct in parishes, Catholic communities, multicultural communities, and Archdiocesan offices by clergy, members of religious orders, employees, volunteers, and parishioners.

Definitions & Abbreviations

ACBC	The Australian Catholic Bishops Conference
ACSL	Australian Catholic Safeguarding Ltd (ACSL established in December 2020) is an independent body to the Catholic Church in Australia that promotes and oversees a nationally consistent, comprehensive, sustainable framework for the protection of children and adults at risk within the Catholic Church. They provide integrated safeguarding services (incl advice, training, education, research and analysis, complaint management, certification, and auditing) informed by Catholic social teaching, designed to support Church entities to meet their responsibilities to provide and embed safe environments for children and adults at risk.
Adult at Risk	An adult at risk is defined as any person over the age of 18 years who is at increased risk of experiencing abuse. (includes: those who are elderly, those with a disability, those who suffer mental illness or have diminished capacity or cognitive impairment, those who have suffered previous abuse, those who are experiencing transient risks or may be subject to a power imbalance in receiving ministry or service, those who identify as Aboriginal or Torres Strait Islander or are from a culturally and linguistically diverse background, those who are of diverse sexuality, or those who have any other impairment or adversity that makes it difficult for them to protect themselves.
Catholic Church	The Catholic Church is a broad concept that includes any Catholic Church body, and all people involved in the life and work of the Church.
Child or Young Person	A child or young person is a person under the age of 18 years.
Clergy/Religious Person/Member of Religious Order	The group or body of ordained Priests, Deacons, and consecrated Brothers & Sisters who perform religious spiritual services.
Conflict of Interest	A conflict of interest occurs when an individual's personal interests – family, friendships, financial, or social factors – could compromise his or her judgment, decision, or actions in the workplace. These arise when

the personal interests of the employee conflict with the professional interests of the organisation.

Duty of Care

Duty of care is a legal obligation requiring Church personnel to uphold a reasonable standard of care by taking all reasonable steps to avoid causing foreseeable harm to persons in the care of the Church.

Employee

An employee is a person engaged for remuneration to perform a specific role or task of any kind within a parish, school, or other Catholic agency or organisation.

**Integrity in Our
Common Mission:**

*(The National Code of
Conduct, ACBC)*

Integrity in our Common Mission is a National Code of Conduct for those exercising pastoral ministry in the dioceses of the Catholic Church in Australia includes bishops, priests, deacons, seminarians, religious, lay men and women exercising a pastoral ministry (by appointment or in a voluntary capacity) in the name of the diocese, its parishes and agencies. The Code of Conduct provides a framework to be applied to a variety of settings, experiences, relationships, and pastoral engagements in daily ministry. The principles have been developed to guide, form, strengthen, and affirm the behaviours expected of all engaged in the ministries of the Church: in parish and sacramental life, education, health and community services, pastoral care, social welfare support, and the variety of other ministries to which people of faith are called.

**National Response
Protocol**

The National Response Protocol is a framework for Catholic entities across Australia to respond consistently to people raising concerns or allegations of child abuse. It outlines principles and procedures for Church personnel to follow that are trauma informed, sensitive, confidential, respectful, and just. These principles prioritise the safety and well-being of victims and survivors within a culture of harm prevention. *The National Response Protocol* was adopted by the Australian Catholic Bishops Conference (ACBC) and came into effect for all dioceses and ACBC member entities from 1 February 2021. The National Response Protocol replaces *Towards Healing* which ceased to be effective as of 1 January 2022.

NCSS
The National Catholic
Safeguarding Standards

National Catholic Safeguarding Standards Edition 2 (NCSS) are a suite of 10 safeguarding standards tailored to the Catholic and parish context and reflective of the *National Principles for Child Safe Organisations* (endorsed by COAG in 2019). The standards provide a framework for Catholic entities to promote cultures of safety and build safeguarding capacity with a particular focus on the safety of children, young people, and adults at risk. Their intent is to foster a protective Church culture in which everyone is safe and all Church personnel share safeguarding responsibility through the implementation of policies and activities to prevent, respond to, and report concerns regarding harm and abuse. They were initially developed to safeguard children and young people but were updated in 2023 to also incorporate the protection of adults at risk.

National Redress Scheme

The National Redress Scheme is a scheme to assist people who have experienced institutional child sexual abuse to report allegations and access redress. The Catholic Archdiocese of Adelaide is a participating institution of the scheme. The scheme commenced operations on July 1st, 2018, and will run for 10 years. Redress is an alternative to seeking compensation through the courts. The scheme can provide; access to counselling, a payment or a direct personal response, such as an apology.

Person of Concern

An individual whose past or present behaviour raises concerns about the safety and well-being of children or adults at risk. (incl: those with convictions for offences against children or adults, a history of allegations or substantiations relating to child or adult sexual offences, revoked or denied working-with-children clearances, concerning behaviours, or disciplinary actions through professional bodies) Information may be based on legal documents, public records, or shared reports under child-related employment screening protocols.

Personnel

Clergy, members of religious orders, employees, and volunteers of the Catholic Archdiocese of Adelaide

Primacy Principle

The overriding principle that the safety of children and adults is the primary consideration in all decision making relative to parish and multicultural community activity.

Safeguarding	Safeguarding refers to measures and practices put in place to protect children, young people and adults at risk, from abuse, neglect, exploitation, or harm. It involves creating safe environments where individuals are protected from abuse, have their health, safety, and wellbeing promoted, their voices heard, and their rights respected.
Substantiated Complaint	A substantiated complaint is a formal complaint or allegation of abuse in which, after investigation, it is determined that the alleged conduct is more likely than not to have occurred. This conclusion is formed on the balance of probabilities under the civil standard of proof.
Trauma Informed Approach	Trauma informed approach acknowledges a widespread and all-pervading impact of trauma upon victims and survivors of significant trauma, such as child sexual abuse. It is based upon the understanding that the impact of trauma upon the individual is often more significant than the trauma itself. Trauma informed services do not re-traumatise or apportion blame to victims and survivors and acknowledge that trauma can have a significant impact on the individual's daily functioning, capacity, memory, and trauma recall.
VELM	Vox Estis Lux Mundi (VELM) is a decree which requires allegations of sexual abuse occurring from 1 June 2019 against minors and adults at risk committed by: Bishops, Clerics, Religious Sisters and Brothers, members of societies of apostolic life (lay and ordained), and other leaders, to be reported to authorities and be dealt with appropriately, to ensure justice for victims and safeguarding of the common good.
Volunteer	A volunteer is an individual who has been assigned or given a role or responsibility of any kind within a parish, school, or other Catholic agency or organisation, while not being paid for the service they provide.
Whistle-blower	A person such as an employee, member of the clergy, member of a religious order, or volunteer who, in good faith and with reasonable cause, comes forward and shares his or her knowledge regarding any wrongdoing, impropriety, irregularity, or unlawful or immoral activity by another person or persons within an organisation.