

**Safe Ministry to Children Canon 2017:
Report of the diocesan audit of the
Diocese of Ballarat**

November 2020

Executive Summary

In late 2017, the Synod of the Diocese of Ballarat adopted the Safe Ministry to Children Canon 2017 (the **Canon**).

The Canon contains national minimum standards for safe ministry to children in the Anglican Church of Australia, including:

- a national code of conduct that sets out behavioural expectations for ministry with children
- standards for the screening and training of clergy and church workers engaged in ministry to children, and
- standards for safe ministry with persons of concern.

The Canon also provides for an audit of compliance by each diocese with the Canon to occur at least once every three years. This audit is referred to as the diocesan audit.

The purpose of this report is to set out the findings of the diocesan audit of the Diocese of Ballarat.

This report is one of four reports of the first round of diocesan audits conducted pursuant to the Canon from December 2019 to late 2020. Over the coming years it is expected that every diocese that has adopted the Canon will be subject to a diocesan audit.

The diocesan audit was disrupted by the public health emergency related to COVID-19, which required that the audit team and officers of the Diocese of Ballarat find solutions to ensure that the diocesan audit was conducted in a safe way, while being completed in a reasonable timeframe.

We wish to extend thanks to the officers of the Diocese of Ballarat for their assistance over the course of the diocesan audit, and in particular the Reverend Glen Wesley, Diocesan Child Safety Officer of the Diocese of Ballarat.

The format of the report follows the standards set out in the Canon. Under each, we set out our findings in respect of our policy assessment of the policies and procedures in place in the Diocese of Ballarat that give effect to the standards in the Canon.

We also set out the results of our material compliance assessment, which is an assessment of whether the Diocese of Ballarat has in practice complied with the standards in the Canon in the period from 1 January 2018 to 31 December 2019 (the **audit period**).

For more information about our approach to undertaking the diocesan audit see the document titled 'Diocesan audit framework' dated 27 February 2020 (the **Audit Framework**). For a glossary of terms used throughout this report please see **Annexure A**.

Diocesan code of conduct

In Part 2 of this report, we have assessed whether any 'diocesan code of conduct' of the Diocese of Ballarat contains additional standards or guidelines that are inconsistent with the prescribed code of conduct or any equivalent code of conduct.

The following documents were reviewed:

- Faithfulness in Service, adopted in October 2020 by Bishop-in-Council of the Diocese of Ballarat
- The Code of Good Practice for Clergy (**Code of Good Practice**), adopted in October 2010 by Bishop-in-Council of the Diocese of Ballarat as being a code of conduct for clergy
- The Joys and Responsibilities of being a Christian in this Parish: Code of Practice for Congregations (**Joys and Responsibilities**), adopted in February 2018 by Bishop-in-Council as being a code of conduct for members of a congregation (not only for clergy or church workers), and

- The Children’s Ministry Code of Conduct which is contained in a policy document titled Guidelines for Ministry to Children. The policy document is applicable to all clergy and church workers engaged in ministry to children.

However, during the audit both the Code of Good Practice and Joys and Responsibilities were withdrawn as being relevant diocesan codes of conduct by Bishop in Council of the Diocese of Ballarat.

The following findings were made:

 Faithfulness in Service and the Children’s Ministry Code of Conduct do not contain additional standards and guidelines that are inconsistent with the prescribed code of conduct.

We have raised some other matters that require further consideration by the Diocese of Ballarat, including that the the Children’s Ministry Code of Conduct could be made clearer by including reference to the fact that clergy, and church workers engaged in ministry to children, are also subject to the prescribed code of conduct.

Recommendation 1

The Diocese of Ballarat should amend the Children’s Ministry Code of Conduct by referring to the fact that clergy and church workers are bound by the prescribed code of conduct.

Standards of screening

In Part 3 of this report we have assessed the policy position of the Diocese of Ballarat against the standards of screening.

The Diocese of Ballarat conducts additional screening of those subject to the standards of screening in the form of police checks, including for those people who are otherwise required to hold a working with children check.

The Diocese of Ballarat also screens a wider category of people than is required to be screened under the Canon. There are good reasons for having a more expansive screening regime, including that people in governance positions in the Diocese are screened for suitability for their roles where they have leadership responsibility or responsibility for financial matters.

Additional screening requirements, and screening for additional categories of people, do not generate inconsistencies with the requirements in the Canon which are focused on child safety.

The Diocese of Ballarat has a system of escalating adverse screening assessments to the Director of Professional Standards, who is able to refer matters to the Professional Standards Committee for additional support and advice as to the suitability of someone for ministry.

During the audit period, the Diocese of Ballarat has undergone a program of re-screening all clergy and church workers engaged in ministry to children. At the time of the diocesan audit this program was nearing completion.

Accordingly, the policies and procedures in place in the Diocese of Ballarat require minor revision to set out the approach to screening at the level of the Parish after the program of re-screening all workers is complete as some of the policy content is specific to that program.

At the same time, the role description of Parish Safe Church Officers should be clarified to ensure the standards of screening set out in the Canon (and as reflected in the approach of the Diocese of Ballarat) are complied with at the level of the Parish, where the bulk of ministry to children occurs.

Recommendation 2

The Diocese of Ballarat should clarify the role of Parish Safe Church Officer, and consider including the following minimum functions in any role description:

- the Parish Safe Church Officer should notify the Diocesan Safe Church Officer of all people who require a clearance for ministry in a Parish (particularly prospective licensed and volunteer church workers), and
- the Parish Safe Church Officer should ensure that no prospective licensed or volunteer church workers are engaged in ministry to children in a Parish prior to being issued a clearance for ministry.

During the course of our audit we identified minor amendments that should be made to the policy architecture of the Diocese of Ballarat so that they give effect to the standards in the Canon and this is reflected in the body of our report. However, when looked at as a whole, we find that the policies and procedures of the Diocese of Ballarat:

- address all of the categories of worker covered by the standards of screening
- assign responsibility to identified persons to ensure that the standards of screening are complied with
- include a mechanism whereby information about the standards of screening are reported centrally
- include information about recordkeeping practices, and
- include a system of ongoing monitoring of the screening that has occurred.

Accordingly, we conclude that:

 The Diocese of Ballarat currently has in place policies and procedures that give effect to the standards of screening.

 The policies and procedures of the Diocese of Ballarat do not contain any additional standards that are inconsistent with the standards of screening in the Canon.



The Diocese of Ballarat has procedures in place which effectively monitor observance by clergy and church workers in the diocese and provide for an appropriate response to instances of non-observance of the standards of screening.

We note that the Diocese of Ballarat is continuing to improve its systems for screening, including developing a screening model which includes the use of online forms to complete safe ministry assessments as opposed to reliance on hard copy forms.

Also in Part 3, we have assessed whether the Diocese of Ballarat has complied with the standards of screening in practice throughout the audit period based on the information provided to us by the Diocese of Ballarat. The findings of the material compliance assessment are set out in **Annexure B** to this report and are commented on in the body of this report.

In relation to identifying a date that a safe ministry assessment occurred we have, by agreement, used the date a clearance for ministry was issued. This may not be the date a safe ministry assessment was undertaken by the Diocese of Ballarat (and is more likely to be the latest date by which it would have occurred).

There are good reasons for recording when a safe ministry assessment has occurred, the most obvious of which is that there is a degree of accountability that the assessments have occurred and forms have not just been received and filed.

Recommendation 3

The Diocese of Ballarat should amend their screening process to ensure they record information about the completion of safe ministry assessments, including:

- the date a form is reviewed, and
- the name of the safe ministry personnel or professional standards personnel that has reviewed the form.

This information could be recorded by amending the hard copy application forms to have an 'office-use-only' section to record this information. In the event of the Diocese of Ballarat moving to online forms, this information could be recorded in data fields in the relevant database.



The Diocese of Ballarat has been compliant in screening all clergy appointed prior to the audit period in accordance with the Canon.



The Diocese of Ballarat has been partly compliant in screening all licensed, authorised or paid church workers engaged in ministry to children appointed prior to the audit period in accordance with the Canon.

The following factors are relevant to the findings made in the material compliance assessment:

- the findings relate to compliance with the standards of screening in the audit period only, which included a period of time where the Diocese of Ballarat did not have policies and procedures in place to give effect to the Canon
- the findings do not necessarily reflect the current levels of compliance with the standards of screening in the Diocese of Ballarat
- the findings are based on information provided by the Diocese of Ballarat that was accessible at the time the audit was conducted
- the standards of screening require that steps occur 'prior to' appointment and accordingly non-compliance does not mean that the screening step has not occurred at all, and
- the findings reflect the thresholds set out at **Annexure B**, which require a high degree of compliance in order for a finding of compliance to be made.

At the time of this report, the Diocese of Ballarat is able to demonstrate high-levels of completion of all screening steps for those workers who were considered as part of the material compliance assessment. This information is also set out in the body of this report and at **Annexure B**.

In relation to the identified areas of non-compliance, one of the areas related to conducting medical and psychological assessments of candidates for ordination. Although the Diocese of Ballarat has a policy position of requiring these assessments for candidates for ordination, this has not been done in the audit period.

It is recognised that screening of candidates for ordination occurs concurrently with a discernment or formation process overseen by a ministry development body. We have recommended that the Diocese of Ballarat develop a joint strategy between those bodies to ensure the required screening occurs.

The following findings were made:



The Diocese of Ballarat has been non-compliant in screening all candidates for ordination, licensed clergy, and licensed, authorised, paid or volunteer church workers engaging in ministry to children in the audit period in accordance with the Canon.

Recommendation 4

The Diocese of Ballarat should develop a joint strategy between the diocesan safe ministry authority and the ministry development body to meet the intent of the screening standards.



The Diocese of Ballarat has been compliant in screening all professional standards personnel and safe ministry personnel in the audit period in accordance with the Canon.

As part of this strategy, the Diocese of Ballarat should ensure that candidates for ordination undergo:

- a medical assessment, and
- a psychological assessment.

We have reviewed the information provided by the Diocese of Ballarat relating to people appointed as a licenced, authorised or paid church worker engaged in ministry to children in the audit period.

During the audit we have identified that a number of licensed church workers commenced ministry to children in the audit period prior to being formally appointed by the Diocese of Ballarat. The date those workers commenced ministry has not been recorded and the only information available is anecdotal information provided by Parishes to the effect that they commenced in the audit period.

The reasons for these workers having commenced prior to being formally appointed may include:

- a delay in processing applications made during the audit period brought about by the Diocese of Ballarat’s program to re-screen all relevant workers, and
- a failure at the level of the Parish to confirm those workers had been issued a clearance for ministry with the diocesan safe ministry authority prior to allowing them to commence ministry to children.

In Recommendation 2 above, we have proposed that the role of Parish Safe Church Officer be focused on identifying people required to be screened in the Parish and ensuring they do not commence ministry until they have been screened.

As mentioned above, there has been a significant effort made by the Diocese of Ballarat to ensure all of the workers appointed during the audit period have completed the required screening steps by the date of this report.

The high levels of completion, albeit not prior to appointment as required under the Canon, puts the Diocese of Ballarat in a strong position to achieve full compliance in future audits.

This is because workers are only required to undergo many of the screening steps once, and once completed they are not required to undergo that step again.

Standards of training

In Part 4, we have reviewed the approach of the Diocese of Ballarat to providing accredited training.

The standards of training require that workers subject to the Canon undergo accredited training in the three years prior to being appointed or within three months of being appointed.

During the audit period, the Diocese of Ballarat has had a policy position of requiring that all leaders to attend accredited training within their first year of leadership.

The policies and procedures of the Diocese of Ballarat:

- do not require that the standards of training are complied with prior to clergy and church workers being appointed (or otherwise) to a ministry position
- do not require that clergy or church workers are unable to undertake ministry to children until they have been appropriately trained, and
- do assign responsibility to identified persons to ensure that accredited training occurs and include mechanisms to respond to non-compliance by clergy and church workers.

The following findings were made:



The Diocese of Ballarat does not yet have in place policies and procedures that give effect to the standards of training.



The policies and procedures of the Diocese of Ballarat do not contain any additional standards that are inconsistent with the standards of training in the Canon.



The Diocese of Ballarat has procedures in place which effectively monitor observance by clergy and church workers in the diocese, and provide an appropriate response to instances of non-observance of the standards of training.

The clearance for ministry issued by the Diocese of Ballarat provides a mechanism by which the Diocese of Ballarat can ensure that clergy and church workers engaged in ministry to children have satisfactorily completed accredited training prior to being appointed (or otherwise) to their role.

Recommendation 5

The Diocese of Ballarat should ensure that prior to a clearance for ministry being issued in relation to clergy, or a church worker engaged in ministry to children, that they have satisfactorily completed accredited training in accordance with the standards of training.

Overall, we consider the approach to accredited training by the Diocese of Ballarat to be sensible and one which could achieve full compliance in future years. This is particularly the case now that the Diocese of Ballarat has implemented online training, which may make the completion of accredited training prior to appointment more efficient as workers are not required to wait until a scheduled training event in the local area.

Also in Part 4 we have assessed whether the Diocese of Ballarat has complied with the standards of training in practice throughout the audit period based on the information provided to us by the Diocese of Ballarat.

The following findings were made:



The Diocese of Ballarat has been non-compliant in training candidates for ordination, clergy, licensed, authorised or paid church workers engaged in ministry to children in the audit period in accordance with the Canon.



The Diocese of Ballarat has been compliant in training safe ministry personnel and professional standards personnel in the audit period in accordance with the Canon.

Standards of safe ministry with persons of concern

We have reviewed the approach of the Diocese of Ballarat to safe ministry with persons of concern.

The following findings were made:



The Diocese of Ballarat has in place standards and guidelines that give effect to the standards of safe ministry with persons of concern, with cogent reasons provided for departure from the prescribed policy.



The Diocese of Ballarat does not have any additional standards and guidelines that are inconsistent with the standards of safe ministry with persons of concern.



The Diocese of Ballarat has procedures in place that effectively monitor observance by clergy and church workers in the diocese of the standards of safe ministry with persons of concern and provide for an appropriate response to instances of non-observance.

Also in Part 5 we have assessed whether the Diocese of Ballarat has complied with the standards of safe ministry with persons of concern in practice throughout the audit period based on the information provided to us by the Diocese of Ballarat.

We made the following finding:



The Diocese of Ballarat has been compliant in managing persons of concern in accordance with the standards of safe ministry with persons of concern from 1 January 2019.

This has involved significant work from administrative staff in the Diocese, as well as all clergy and church workers who are engaged in ministry to children, most often in a voluntary capacity.

The re-screening project was not complete at the time of the diocesan audit, and this is reflected in the results of the diocesan audit. Nonetheless, once complete, the effect of the re-screening program will mean that the Diocese of Ballarat is well positioned for full compliance in accordance with the Canon in coming years. Achieving this will require consistent effort from all responsible people to ensure that the systems put in place continue to be improved.

Recordkeeping

We have considered primary source documents provided by the Diocese of Ballarat in accordance with the quality assurance process set out in the Audit Framework. There was a high level of completeness of information which the audit team considers is indicative of good recordkeeping practices



The Diocese of Ballarat has been compliant in keeping records with respect to the prescribed standards and guidelines in accordance with the Canon.

Conclusion

Overall, we conclude that the Diocese of Ballarat has adopted policies and procedures that generally give effect to the standards and guidelines in the Canon, with some exceptions.

We note that the Canon was adopted at a time when the Diocese of Ballarat did not have in place all the policies, procedures and systems necessary to give full effect to the Canon.

However, during the audit period, the Diocese of Ballarat has undergone a diocese-wide program of ensuring that everyone is re-screened in accordance with the screening steps set out in the Canon.

1 Background

The Diocese of Ballarat

Established on 30 October 1873, the Diocese of Ballarat is one of the 23 dioceses of the Anglican Church of Australia, and one of five dioceses (along with the Dioceses of Melbourne, Bendigo, Gippsland and Wangaratta) that comprise the Province of Victoria.

The Diocese of Ballarat covers an area in southern and western Victoria, with the administrative services of the Diocese based in Ballarat (the Diocesan Centre is located near the Cathedral Church of Christ the King).

As at around 2016, the Diocese of Ballarat had as follows:

- 24 Parishes, Parochial or Mission Districts
- approximately 2500 church members, and
- 30 active clergy and 35 retired clergy with a permission to officiate (PTO).

During the audit period, the Diocese of Ballarat has made significant changes to the way that it undertakes screening and training, including by:

- adopting and rolling out new policies and procedures relating to screening and training
- implementing a new database to store all screening and training records, and
- requiring that ALL clergy and persons engaged in ministry to children re-apply for a clearance for ministry, including by resubmitting forms necessary for a safe ministry assessment.

As a result of the introduction of this program, the Diocese of Ballarat has had to process a high volume of screening information which had not been completed at the point of us commencing the diocesan audit

During the audit period, some licensed church workers engaged in ministry to children commenced ministry to children prior to being formally appointed, and it is agreed that this was partly due to the focus on processing other applications. We address this issue in more detail and in relation to our material compliance assessment in Part 3 of this report.

Safe Church policy architecture

The policies and procedures discussed in this report relate primarily to the systems in place to promote awareness of any code of conduct, to ensure people are adequately screened and trained, and to ensure there are strategies in place to manage persons of concern.

In the Diocese of Ballarat, these policies and procedures are part of a broader safe church policy architecture that includes:

- policies and procedures for responding to complaints of child sexual abuse, or sexual misconduct involving a child
- child safety guidelines which set out practical information about child safety, and
- redress options for those who have experienced abuse, including via the National Redress Scheme for Institutional Child Sexual Abuse.

Legislative context

In addition, the Diocese of Ballarat and/or its personnel are subject to relevant legislative obligations in force in Victoria, including:

A. Child safe standards

The obligation to comply with the Child Safe Standards made pursuant to section 17 of the Child Wellbeing and Safety Act 2005 (Vic).

We note that the following standards relate to matters addressed in this report:

- Child Safe Standard 3: A code of conduct that establishes clear expectations for appropriate behaviour with children, and
- Child Safe Standard 4: Screening, supervision, training and other human resources practices that reduce the risk of child abuse by new and existing personnel.

B. Screening

The obligation to ensure that people that engage in child-related work (including as ministers of religion) have obtained a working with children check in accordance with:

- *Working with Children Act 2005* (Vic), and
- *Working with Children Regulations 2016* (Vic).

There are other obligations in relation to a statutory duty to take reasonable care to prevent child abuse, mandatory reporting, the reportable conduct scheme and criminal reporting.

We discuss the interaction between the relevant obligations and the standards in the Canon in further detail as they relate to screening in Part 3 of this report.

Diocesan audit

The Canon sets out that there will be a diocesan audit conducted at intervals of three years or less (as determined by the Standing Committee of General Synod).

In undertaking the diocesan audit, we are required to assess the following:

Prescribed code of conduct



Faithfulness in Service
A national code for personal behaviour and the practice of pastoral ministry by clergy and church workers

General Synod of the Anglican Church of Australia
Child Protection Committee

As adopted by General Synod 2016
Amended July 2016
Amended March 2018
Amended October 2018
Amended April 2019
Amended November 2019
Amended May 2020
Amended November 2020

Does any diocesan code of conduct contain additional standards or guidelines that are inconsistent with the **prescribed code of conduct** or any equivalent code of conduct?

Prescribed standards and guidelines

- Does the diocese have standards, and guidelines, that **give effect** to the **prescribed standards and guidelines**?
- Does the diocese have any additional standards and guidelines that are inconsistent?
- Does the diocese have in place procedures which effectively monitor observance by clergy and church workers, and provide for an appropriate response to instances of non-observance?

- Have the procedures in all material respects been followed?
- Have accurate records been created and maintained?

Public reporting of compliance with the standards set out in the Canon is one way in which the Diocese of Ballarat is accountable and transparent about the efforts made by it to improve child safe practices. The audit of adherence by the Diocese of Ballarat to the Canon:

- ensures that the standards and guidelines set out in the Canon are being implemented
- is a process to give effect to continuous review and improvement of child safe practices, and
- provides assurance to the public that the Diocese of Ballarat (as part of the Anglican Church of Australia) is committed to safe ministry to children.

The diocesan audit is consistent with the encouragement of the Royal Commission into Institutional Responses to Child Sexual Abuse (**Royal Commission**) for religious organisations to publicly report on the implementation of, and compliance with, standards of safe ministry to children.



As acknowledged in the Audit Framework, each diocese may take a different approach to implementing the standards in the Canon. These approaches may be informed by the legislative context in which they operate, and the administrative systems available to implement and monitor the standards. Where possible we have accounted for these differences in the course of the diocesan audit.

2 Code of Conduct

Prescribed code of conduct

Clergy and church workers in the Diocese of Ballarat are bound to observe the prescribed code of conduct.



The prescribed code of conduct comprises sections 3 and 5 (read in conjunction with section 1 and section 2) of 'Faithfulness in Service: A national code for personal behaviour and the practice of pastoral ministry by clergy and church workers' as amended in November 2016.

The prescribed code of conduct reflects the high standards of behaviour expected of clergy and church workers engaged in ministry to children across the Anglican Church of Australia.

Additionally, in Victoria, institutions that are subject to the Child Safe Standards made pursuant to section 17 of the *Child Wellbeing and Safety Act 2005* (Vic) are required to have a code of conduct that sets out expected standards of behaviour with children (Child Safe Standard 3).

Diocesan codes of conduct

As set out in Part 1 above, the diocesan audit involves an assessment as to whether any 'diocesan code of conduct' contains additional standards or guidelines that are inconsistent with the prescribed code of conduct or any equivalent code of conduct.

A 'diocesan code of conduct' is any code of conduct relating to safe ministry to children which has been approved by the synod or diocesan council of a diocese.

For most dioceses this will be the version of Faithfulness in Service a part of which constitutes the prescribed code of conduct.

At the time of commencing the audit there were four diocesan codes of conduct in force in the Diocese of Ballarat:

- 'Faithfulness in Service', adopted in October 2011 by Bishop-in-Council of the Diocese of Ballarat
- 'Code of Good Practice for Clergy' (**Code of Good Practice**), adopted in October 2010 by Bishop-in-Council of the Diocese of Ballarat as being a code of conduct for clergy
- 'The Joys and Responsibilities of being a Christian in this Parish: Code of Practice for Congregations' (**Joys and Responsibilities**), adopted in February 2018 by Bishop-in-Council as being a code of conduct for members of a congregation (not specifically for clergy or church workers). The scope of the document is limited to parishes, churches and congregations, and
- 'Children's Ministry Code of Conduct' which is contained in a policy document titled 'Guidelines for Ministry to Children'. The policy document is applicable to all clergy and church workers engaged in ministry to children. Accordingly, it is assumed that the Children's Ministry Code of Conduct sets out expected standards of behaviour for all clergy and church workers engaged in ministry to children and is applicable to them.

However, during the audit process the version of Faithfulness in Service in the Diocese of Ballarat was updated to the most recent version, and the Code of Good Practice and Joys and Responsibilities were rescinded by Bishop-in-Council of the Diocese of Ballarat.

Accordingly, we have based our findings on those diocesan codes of conduct still in effect, and included some commentary in this report about those diocesan codes of conduct that have been rescinded.

Policy Assessment

Faithfulness in Service

As at October 2020, the version of Faithfulness in Service in force in the Diocese of Ballarat is identical to the prescribed code of conduct.



The version of Faithfulness in Service in force in the Diocese of Ballarat does not contain additional standards and guidelines that are inconsistent with the prescribed code of conduct.

Prior to adopting the more recent version of Faithfulness in Service, the version of Faithfulness in Service in force in the Diocese of Ballarat was originally adopted by Bishop-in-Council in 2011. This version was inconsistent with the prescribed code of conduct in the following respects:

- it had different definitions to the prescribed code of conduct for the following defined terms 'bullying', 'grooming' and 'sexual abuse of a child', and
- it did not include the description in relation to grooming at clause 5.16 of the prescribed code of conduct.

The reason for the inconsistency was simply that the Diocese of Ballarat had not adopted the most recent version of Faithfulness in Service and so the definitions had not been updated to capture amendments made to Faithfulness in Service over time. This has now been done by the Diocese of Ballarat and accordingly there is no longer any inconsistency.

Code of Good Practice for Clergy

We reviewed the Code of Good Practice for Clergy, which, as the name suggests, was a code of conduct for clergy, that recognised 'the privileged position clergy enjoy carries corresponding responsibilities, including the observation of professional boundaries'.

We notified the Diocese of Ballarat that several clauses of the Code of Good Practice for Clergy required updating following amendments to section 127 of the *Evidence Act 2008* (Vic) and section 182 and 184 of the *Children, Youth and Families Act 2005* (Vic).

These amendments relate to:

- the availability of religious confessions privilege in circumstances where it would be an offence not to report certain information to government authorities, and
- the requirement that a person in religious ministry make a mandatory report where they have formed the belief on reasonable grounds that there is a child in need of protection.

Although the clauses in question were correct at the time the Code of Good Practice for Clergy was first published, there was a risk that, in the absence of any amendment, clergy would misunderstand the position at law if they were to rely on the document by itself.

Further, there would have been an inconsistency with the prescribed code of conduct which includes standards relating to complying with the law, and reporting to civil authorities (see clauses 5.8, 5.14 and 5.15 of the prescribed code of conduct).

We note that the Diocese of Ballarat has adopted detailed policy guidance in relation to reporting information and complaints to civil authorities consistent with the position at law and has now rescinded the Code of Good Practice for Clergy.

Joys and Responsibilities

We reviewed Joys and Responsibilities, which is focused on the expected behaviours of people engaged in a congregational life, and therefore is not specifically addressed to clergy or church workers engaged in ministry to children.

The standards and guidelines set out in Joys and Responsibilities were complementary to those in the prescribed code of conduct and did not contain additional standards and guidelines that were inconsistent with the prescribed code of conduct. Joys and Responsibilities has since been rescinded.

Children's Ministry Code of Conduct

We have reviewed the Children's Ministry Code of Conduct, which is contained in a policy document titled 'Guidelines for Ministry to Children'. The Children's Ministry Code of Conduct sets out in practical language what is expected of those engaged in ministry to children.

The standards and guidelines set out in the Children's Ministry Code of Conduct are complementary to those in the prescribed code of conduct.



The Children's Ministry Code of Conduct does not contain additional standards and guidelines that are inconsistent with the prescribed code of conduct.

However, the Children's Ministry Code of Conduct:

- does not include reference to the fact that persons subject to it may also be subject to the prescribed code of conduct, and
- as a minor point, differs from the prescribed code of conduct in that it does not make allowance for the provision of wine in the course of Holy Communion as set out in the guidelines of the prescribed code of conduct. However, this difference does not appear to have an impact on the question of child safety and so we do not consider it an inconsistency.

The relationship between the document and the prescribed code of conduct could be made clearer by including reference to the fact that people engaged in ministry to children are also subject to the prescribed code of conduct.

Recommendation 1

The Diocese of Ballarat should amend the Children's Ministry Code of Conduct by referring to the fact that clergy and church workers are bound by the prescribed code of conduct.

At the commencement of the diocesan audit there were four codes of conduct in effect in the Diocese of Ballarat excluding the prescribed code of conduct. There are now only two codes of conduct (including one which is identical to the prescribed code of conduct).

Although we recognise that it is possible to have multiple diocesan codes of conduct that are not inconsistent with the prescribed code of conduct, there are good reasons for having one diocesan code of conduct that is consistent prescribed code of conduct and a simple code of conduct for ministry to children, which together would also satisfy Child Safe Standard 3.

For example, having fewer codes of conduct will assist the Diocese of Ballarat in developing a shared understanding across the Diocese of the expected standards of behaviour with children.

3 Standards of screening

Standards of screening

The standards of screening require that clergy and church workers undergo various screening steps prior to being appointed (or otherwise) to their role.

For most clergy and church workers, the standards of screening provide that in order for a person to be appointed (or otherwise) they are required to:

- obtain a working with children check or working with vulnerable people check
- if this is not required, then undergo a criminal history assessment or risk assessment, and
- undergo the following assessments:
 - a national register assessment
 - a safe ministry assessment
 - where the person was previously authorised for ministry in another Province, diocese or denomination then a church ministry assessment may be required if not reasonably satisfied that this has previously been done.

The Canon limits the categories of church workers subject to the standards of screening to those who are engaged in ministry to children.

Some categories of worker are subject to higher screening standards due to the stage of ministry they are entering into, with candidates for ordination as a deacon (sometimes referred to as ordinands) required to undergo a medical assessment and a psychological assessment.

Other categories of worker are subject to alternative screening processes, for example, volunteer church workers may hold conditional working with children checks or working with vulnerable people checks, and only need to undergo a safe ministry assessment if they are over the age of 13. Volunteer church workers are not required to undergo a church ministry assessment.

Definitions

In this report we use the following definitions from the Canon, although the screening step may be defined differently by the Diocese in its policies and procedures. For a glossary of defined terms see **Annexure A**.

church ministry assessment means a reasonable endeavour made to obtain information about the person from the responsible authority, and if obtained consideration of that information

criminal history assessment means consideration of a National Police History Check of the person

medical assessment means consideration of a medical report of the person by a registered medical practitioner

national register assessment means a check whether there is any information about the person entered in the National Register, and if so consideration of that information

psychological assessment means consideration of a psychological report that includes an assessment of psychosexual maturity of the person by a registered psychologist

safe ministry assessment means consideration of the person's completed Safe Ministry Check, and if applicable referees' completed Safe Ministry Checks

Likewise, safe ministry personnel and professional standards personnel, if they have not otherwise been required to be screened by virtue of being a member of clergy or a church worker, are required to undergo a national register assessment.

The standards of screening do not apply to those who were appointed (or otherwise) before the Canon has come into effect in a diocese, except insofar as the standards of screening relate to those workers requiring a working with children check or working with vulnerable people check, or alternatively a criminal history assessment or risk assessment.

Policy assessment

The diocesan audit is required to assess whether a diocese has:

- standards, and guidelines that give effect to the standards of screening (unless there are cogent reasons for not doing so)
- any additional standards and guidelines that are inconsistent with the standards of screening, and
- procedures in place which effectively monitor observance by clergy and church workers in the diocese and provide for an appropriate response to instances of non-observance of the standards of screening.

The policies and procedures of the Diocese of Ballarat that give effect to the standards in the Canon are as follows:

- Appointments Act 2019
- Parochial Government Act 1991-2019
- Professional Standards Act 2010
(Professional Standards Act)
- Clearance for Ministry Protocol
- Guidelines for Screening and Licensing for Ministry, and
- Put into the Deep - Pathways to Ordained Ministry

Together, the documents describe a screening system in place in the Diocese of Ballarat that echoes the screening approach adopted by government,

in that clergy and church workers are required to be issued a 'clearance for ministry' by a central screening authority prior to them taking up a ministry position in the Diocese.

The requirement for a clearance for ministry is set out in Part 11 of the Professional Standards Act and the Clearance for Ministry Protocol, with further policy guidance set out in the Guidelines for Screening and Licensing for Ministry.

The result of adopting this model is that the screening system in the Diocese of Ballarat is highly centralised in a single screening authority (the Diocesan Safe Church Officer and Professional Standards Director), rather than dispersed across volunteers at a Parish level.

Although the Diocese of Ballarat has used the idea of 'clearance for ministry' since 2010, it has recently updated its processes and rolled out a new 'Safe Church Program'. In the case of screening this includes using a new database to record all screening information (including Working with children checks and police checks) and to record when clearances have been issued.

As a result of the introduction of the new 'Safe Church Program', the Diocese of Ballarat has undergone work 'onboarding' or 're-screening' all clergy and church workers regardless of whether their appointment has occurred prior to or during the audit period. This has had an impact on our assessment of material compliance which we discuss in further detail below.

Appointments Act 2019

The Appointments Act 2019 requires that prior to a member of clergy being issued a licence they must have a clearance for ministry in accordance with Part 11 of the Professional Standards Act.

Parochial Government Act 1991-2019

The Parochial Government Act 1991-2019 requires that a Parish Council of a Parish appoint a Safe Church Officer. The Act does not otherwise describe what a Safe Church Officer does, however, the responsibilities of this role are described in other policy documents as below.

Professional Standards Act

Part 11 of the Professional Standards Act requires that clergy and church workers must obtain a 'clearance for ministry' where they take up an office, licence or position or responsibility in the Diocese or transfer between offices or roles in the Diocese.

The Professional Standards Act sets out that:

- it is a condition of eligibility for a clearance that the person is fit to hold an office, licence or position of responsibility in the Church, and
- applications for a clearance are made to the Bishop, who may refer the matter to the Professional Standards Committee (**PSC**) and Professional Standards Board (**PSB**) for advice as to fitness for ministry.

The Professional Standards Act also contains an appeal process in the event someone is not granted a clearance for ministry. We have notified the Diocese that this process may be unnecessary for paid church workers and volunteers with reference to what would occur in an ordinary employment context.

Clearance for Ministry Protocol

Part 3 of the Professional Standards Act allows for Bishop-in-Council to approve protocols for implementation in relation to the matters contained in the Act. On 26 August 2010, Bishop-in-Council of the Diocese of Ballarat authorised the Clearance for Ministry Protocol to address the matters set out in Part 11 of the Act. The Protocol was most recently updated on 19 June 2018.

The Clearance for Ministry Protocol sets out that applications for a clearance for ministry are made to the Bishop. The application is referred to the Diocesan Safe Church Officer (as delegate of the Bishop) and the Director of Professional Standards who:

- acknowledge receipt of the application
- as necessary, provide the applicant with the required forms to complete a working with children check and national police check

- create an account for the applicant using Safety Management Online (the database utilised by the Diocese of Ballarat)
- run a search for information relating to the applicant on the National Register
- refer any adverse screening information contained in any of the screening checks above to the Director of Professional Standards, and
- subject to the view of the Director of Professional Standards, refer the application with all completed information to the Bishop to issue the clearance.

In practice, we understand that the Director of Professional Standards issues the clearance for ministry and the Bishop then issues a licence as relevant.

The Clearance for Ministry Protocol requires police checks for all roles, which is additional to what is required under the Canon. Under the Canon, a police check is only required for clergy, and church workers involved in ministry to children where a working with children check is not required.

The Clearance for Ministry also screens a wider category of people than are required to be screened under the Canon. The more expansive approach to screening adopted by the Diocese of Ballarat accounts for the fact that some people will be in positions of leadership or financial responsibility, such that screening for matters other than child safety risks may be prudent.

The specifications of each application are set out in Schedule A and Schedule B of the Protocol. Schedule A of the Protocol sets out application and renewal specifications for roles within the Diocese of Ballarat, categorised into different classes as follows:

- **Class A:** clergy, ordination candidates and people considering ordination
- **Class B:** people in governance roles or with access to information such as members of Bishop-in-Council, members of Synod, members of other diocesan entities, Church wardens and members of Parish Council, as well as people with access to information on Safety Management Online

- **Class C:** licensed, authorised, paid or volunteer church workers involved in liturgical roles, ministry to children or other community services that may involve contact with vulnerable people, and
- **Class D:** paid church workers not involved in ministry to children.

The classes of application most relevant to the diocesan audit are Class A and Class C (except those Class C applications which do not relate to ministry to children).

Schedule A provides that where a church worker:

- is a teacher registered with the Victorian Institute of Teaching (**VIT**) and is able to provide a current VIT registration card (and who must notify Working with Children Check Victoria (the government screening agency) of their work with the Diocese), or
- a member of the Victoria Police or Australian Federal Police and are able to provide their identity card and proof of employment,

they are not required to provide a working with children check.

This is consistent with the Canon which requires clergy, and church workers engaged in ministry to children, to hold a working with children check 'if required'. The above categories of worker (registered teachers and police) are exempt from the requirement to hold a working with children check in accordance with sections 30 and 31A of the *Working with Children Act 2005* (Vic).

Schedule B prescribes the application forms utilised for each class of role. We have reviewed the relevant forms and are satisfied they accord with the forms referenced in the Canon (although they have minor differences). Accordingly, an assessment of those forms would constitute a safe ministry assessment within the meaning of the Canon.

Guidelines for Screening and Licensing for Ministry

The Diocese of Ballarat has developed a suite of policy documents which provide policy guidance to clergy and church workers around the clearance for ministry process.

The Guidelines for Screening and Licensing for Ministry include the information set out in the Clearance for Ministry Protocol. However, the Guidelines refer to a modification to the forms where a person has been in a parish for more than three years, which is that referee checks are not required for those people.

The Guidelines include a renewal schedule for clearances for ministry. For example, clergy are required to obtain a clearance for ministry every 2 years.

The standards of screening set out in the Canon do not require that people undergo the screening steps more than once, notwithstanding that they may need to renew working with children checks as required by law. This additional standard does not create an inconsistency as it does not replace or come into conflict with the standards of screening.

The Guidelines contain a process for facilitating clearances for ministry by the Safe Church Officer of each Parish as follows:

- **Step 1:** identify and create a list of all workers who require a clearance for ministry using the guidelines and a template progress tool available on the Diocesan website, including identifying the class of role they perform or may perform
- **Step 2:** table the list at a meeting of Parish Council of the Parish. Parish Council is to pass a motion approving the list as being accurate as to the people who fill those roles in the Parish
- **Step 3:** distribute the relevant forms to those workers who are required to obtain a clearance for ministry and to assist them compile the relevant information, and
- **Step 4:** collate all of the information and complete the progress tool, providing all of the information back to the Diocesan Safe Church Officer in bulk.

We note that this process is descriptive of the program undertaken by the Diocese of Ballarat to onboard everyone into their screening system at the same time. The Diocese of Ballarat has confirmed that it is not envisaged that this process would be repeated when new applicants for ministry are identified.

Accordingly, there is still some development required as to how the screening system will operate at the level of each Parish after the onboarding program is complete.

Currently, there is limited detail about the role of the Parish Safe Church Officer. The Parish Safe Church Officer is uniquely placed to ensure that the standards of screening set out in the Canon (and as reflected in the approach of the Diocese of Ballarat) are complied with at the level of the Parish, where the bulk of ministry to children occurs.

Recommendation 2

The Diocese of Ballarat should clarify the role of Parish Safe Church Officer, and consider including the following minimum functions in any role description:

- the Parish Safe Church Officer should notify the Diocesan Safe Church Officer of all people who require a clearance for ministry in a Parish (particularly prospective licensed and volunteer church workers), and
- the Parish Safe Church Officer should ensure that no prospective licensed or volunteer church workers are engaged in ministry to children in a Parish prior to being issued a clearance for ministry.

Although this may be achieved in policy documentation, the Diocese of Ballarat should consider whether it should also be set out in a description of the Parish Safe Church Officer role in the Parochial Government Act 1991-2019.

At the same time, the Diocese of Ballarat should consider whether additional policy description is required in the Guidelines for Screening and Licensing for Ministry in relation to screening people who come from overseas and other denominations such that it would meet the definition of church ministry assessment in the Canon.

Put into the Deep - Pathways to Ordained Ministry

The Diocese of Ballarat has published Put into the Deep – Pathways to Ordained Ministry as guidance to those who are considering ordained ministry in the Diocese of Ballarat.

Put into the Deep – Pathways to Ordained Ministry sets out that candidates for ordination are required to meet the child safety requirements of the Diocese, including by completing the Class A application form for a clearance for ministry.

At or around the time of a Vocational Discernment Conference, candidates for ordination are required to provide a current medical certificate and undergo a psychological assessment.

The standards of screening require that candidates undergo a medical assessment which is a consideration of medical report of the person by a registered medical practitioner.

It is unclear whether the assessment of a medical certificate achieves the intended outcome of the assessment referred to in the Canon. The Diocese of Ballarat has sought further clarification about what is intended by the medical assessment step in the Canon and we will relay that request to General Synod Office as we agree that further clarification may be required.

The psychological assessment is conducted in accordance with the document of the Professional Standards Commission of the Anglican Church of Australia called 'A Process for the Comprehensive Psychological Assessment of Candidates for Ordination'. Accordingly, we conclude that it constitutes a psychological assessment as it includes a psychosexual component.

Read together, the policies and procedures of the Diocese of Ballarat give effect to the standards of screening in that they require that people undertake the following screening steps:

	Working with children check	National police check	National register assessment	Safe ministry assessment	Medical assessment	Psychological assessment	Church ministry assessment
Candidates for Ordination	✓	✓	✓	✓	✓	✓	✓
Clergy (incl. Bishops)	✓	✓	✓	✓			✓
Church workers (licenced, authorised and paid)	✓	✓	✓	✓			✓
Church workers (volunteers)	✓	✓	✓	✓			

-  Consistent with the standards of screening in the Canon.
-  Additional requirement, not inconsistent with the standards of screening in the Canon.

Table 1: Standards of screening in the Diocese of Ballarat

The Diocese of Ballarat monitors observance of compliance with the standards of screening centrally at the level of the screening authority, which conducts the various screening assessments for everyone.

The Diocese of Ballarat provides for appropriate responses to non-observance by requiring that people who have not obtained a clearance for ministry are not authorised to conduct ministry. The policy documentation of the Diocese of Ballarat could be improved slightly by emphasising that people that are not authorised are prohibited from undertaking ministry to children.

The Diocese of Ballarat has a system of escalating adverse screening assessments to the Director of Professional Standards, who is able to refer matters to the PSC for additional support and advice as to the suitability of someone for ministry.

We have suggested some improvements for consideration by the Diocese of Ballarat above.

However, when looked at as a whole, we find that the policies and procedures of the Diocese of Ballarat:

- address all of the categories of worker covered by the standards of screening
- assign responsibility to identified persons to ensure that the standards of screening are complied with
- include a mechanism whereby information about the standards of screening are reported centrally
- include information about recordkeeping practices, and
- include a system of ongoing monitoring of the screening that has occurred



The Diocese of Ballarat has in place policies and procedures that give effect to the standards of screening.



The policies and procedures of the Diocese of Ballarat do not contain any additional standards that are inconsistent with the standards of screening in the Canon.



The Diocese of Ballarat procedures in place which effectively monitor observance by clergy and church workers in the diocese and provide for an appropriate response to instances of non-observance of the standards of screening.

- the ability for those administering licences and appointments to be able to confirm whether someone has satisfactorily completed their application and that the appropriate assessments have occurred.

We note that the Diocese of Ballarat is currently progressing to develop a model which includes some of the features set out above, and would result in an increased capacity to assess a higher volume of applications in the future. We encourage the Diocese of Ballarat to keep investigating this model.

Future approach

One of the issues that has arisen for the Diocese of Ballarat is the challenge involved in processing a high volume of hard copy documentation relating to the screening process. In discussion with the Diocese of Ballarat we have considered the development a system of screening that has the following features:

- a single online application that captures, in relation to each category of worker:
 - key personal details
 - their working with children check number
 - the information requested as part of a safe ministry assessment
 - their consent to undertake a criminal history assessment (as necessary), and
 - their consent to undertake a national register assessment
- an ability to run national register assessments automatically
- automatic alerts to appropriate diocesan officers, where:
 - a form is complete and requires assessment
 - a form is incomplete
 - the applicant has provided a response which requires their attention (for example the information or responses provided may result in an adverse screening assessment), and
 - various screening steps require renewal (for example, working with children checks are due for renewal)
- integration of the information provided in the application into the database operated by the Diocese of Ballarat, so that appropriate records are maintained
- the option for each applicant to complete the application in hard copy if necessary, and

Material Compliance Assessment

General

As part of the diocesan audit we are required to assess whether a diocese has followed its procedures in all material respects, and created and maintained records in a secure manner.

The Diocese of Ballarat was requested to provide information in relation to all clergy licensed after 1 January 2018 and prior to 31 December 2019 (the **audit period**), as well as more limited information in relation to all other clergy.

Likewise, information was requested in relation to all safe ministry personnel and professional standards personnel.

The audit team has conducted sampling of various parishes of the Diocese of Ballarat on the basis of the process set out in the Audit Framework in order to assess compliance in relation to church workers engaged in ministry to children.

The diocesan audit has involved a quality assurance process as part of assessing the information provided by the diocesan safe ministry authority. To do this the audit team has:

- reviewed hard copy files of selected clergy and church workers to confirm that the information provided by the diocese is accurate
- been provided access to the online database against which to check information

- identified any inaccuracies in the information provided by the diocesan safe ministry authority, and confirmed this with the diocesan safe ministry authority, and
- determined the impact, if any, that the quality assurance process has on our assessment of material compliance.

We have reviewed the information provided by the Diocese of Ballarat and there was a high degree of accuracy as between the information provided and the primary source information. This is also reflected in our assessment of the recordkeeping practices of the Diocese of Ballarat.

In relation to identifying a date that a safe ministry assessment occurred we have, by agreement, used the date a clearance for ministry was issued. This may not be the exact date a safe ministry assessment was undertaken, and in some instances there is a period of time in excess of 6 months between the time the application was completed by clergy or church workers and the clearance being issued. This may partly be a result of the large volume of applications received as part of the program to re-screen all workers and consequent delay in processing forms.

There are good reasons for recording when a safe ministry assessment has occurred, the most obvious of which is that there is a degree of accountability that the assessments have occurred and forms have not just been received and filed.

Recommendation 3

The Diocese of Ballarat should amend their screening process to ensure they record information about the completion of safe ministry assessments, including:

- the date a form is reviewed, and
- the name of the safe ministry personnel or professional standards personnel that has reviewed the form.

As part of our material compliance assessment the diocesan audit is required to consider matters that may also be legislative obligations for the diocese.

It is important to note that the assessment of whether or not a diocese has complied with the standards of screening is not an assessment of whether or not they have complied with their legislative obligations.

The standards of screening set out in the Canon require that individuals undergo screening 'prior to' appointment.

The Diocese of Ballarat records, for example, when various licences have been issued, but this information may not correlate to the date when the individual commenced engaging in child-related work. Accordingly, non-compliance for the individual in relation to having a working with children check in accordance with the standards of screening does not necessarily mean there has been non-compliance with the legal obligations set out in the *Working with Children Act 2005* (Vic).

Likewise, the following factors are relevant to the findings made in the material compliance assessment:

- the findings relate to compliance with the standards of screening in the audit period only, which included a period of time where the Diocese of Ballarat was undertaking screening of all clergy and church workers engaged in ministry to children and not just those appointed in the audit period
- the findings do not necessarily reflect the current levels of compliance with the standards of screening in the Diocese of Ballarat
- the findings are based on information provided by the Diocese of Ballarat that was accessible at the time the audit was conducted and based primarily on information stored on their online database
- the standards of screening require that steps occur 'prior to' appointment and accordingly non-compliance does not mean that the screening step has not occurred at all, and

- the findings reflect the thresholds set out at **Annexure B**, which require a high degree of compliance in order for a finding of compliance to be made.

Candidates for ordination

We have reviewed the information provided by the Diocese of Ballarat relating to candidates for ordination who were ordained to the diaconate in the audit period.

As set out in **Annexure B**, in the audit period, candidates for ordination undertook the following screening steps prior to ordination:

- 50 per cent had obtained a working with children check if required, or otherwise a criminal history assessment
- 33.3 per cent had undertaken a national register assessment
- 33.3 per cent had undertaken a safe ministry assessment (and a church ministry assessment as necessary)
- 0 per cent had undertaken a medical assessment, and
- 0 per cent had undertaken a psychological assessment.

We make the following finding in relation to compliance with the standards of screening for candidates for ordination:



The Diocese of Ballarat has been non-compliant in screening candidates for ordination in the audit period in accordance with the Canon.

Despite not being screened in accordance with the Canon (which requires screening to have occurred prior to the date licensed), at the date of this report, those people who were candidates for ordination have subsequently completed the majority of the screening steps as follows:

- 100 per cent had obtained a working with children check if required, or otherwise a criminal history assessment
- 100 undergone a national register assessment, and
- 100 per cent have undergone a safe ministry assessment (and a church ministry assessment as necessary).

Accordingly, when these people are next licensed, they are likely to be fully compliant with the terms of the Canon on the basis that:

- many of the screening steps are only required to be conducted once (or as required with renewals), and
- they will already have completed the required screening steps in the Canon to be licenced as clergy.

In relation to the candidates for ordination, we note that the Diocese of Ballarat has a policy position of requiring that candidates undergo both medical assessments and psychological assessment. However, zero percent of people ordained to the diaconate in the audit period underwent a medical or psychological assessment.

Recommendation 4

The Diocese of Ballarat should develop a joint strategy between the diocesan safe ministry authority and the body of the Diocese responsible for discernment and formation of candidates for ordination to meet the intent of the screening standards.

As part of this strategy, the Diocese of Ballarat should ensure that candidates for ordination undergo

- a medical assessment, and
- a psychological assessment.

The Diocese of Ballarat should ensure that any psychological assessment has a component which involves a psychosexual assessment of some kind. The Royal Commission has recommended that religious institutions adopt screening processes for candidates for ordination that include this additional kind of assessment as part of a broader psychological assessment.

Clergy

We have reviewed the information provided by the Diocese of Ballarat relating to clergy who were issued a licence (or where appointed Bishop) in the audit period.

As set out in **Annexure B**, in the audit period, clergy undertook the following screening steps prior to being licensed:

- 88 per cent had obtained a working with children check if required, or otherwise a criminal history assessment
- 80 per cent had undertaken a national register assessment, and
- 60 per cent had undertaken a safe ministry assessment (and a church ministry assessment as necessary).

We make the following finding in relation to compliance with the standards of screening for licensed clergy:



The Diocese of Ballarat has been non-compliant in screening clergy in the audit period in accordance with the Canon.

Despite not being screened in accordance with the Canon (which requires screening to occur prior to the date licensed), at the date of this report, clergy licensed in the audit period have completed the majority of the screening steps as follows:

- 100 per cent have obtained a working with children check
- 100 per cent have undertaken a national register assessment, and
- 100 per cent have undertaken a safe ministry assessment (and a church ministry assessment as necessary).

This is a very high rate of completion of all screening steps and is indicative of a large amount of work by the screening authority to ensure there is compliance at the date of this report.

In addition to those clergy licensed in the audit period, all other licensed clergy were reviewed for whether or not they have a working with children check (or if a working with children check is not required, a criminal history assessment), with the result being that 100 per cent of all other clergy have a working with children check (or criminal history assessment).



The Diocese of Ballarat has been compliant in screening all clergy licensed prior to the audit period in accordance with the Canon.

Licensed, authorised and paid church workers engaged in ministry to children

We have reviewed the information provided by the Diocese of Ballarat relating to people appointed as a licensed, authorised or paid church worker engaged in ministry to children in the audit period.

During the audit we have identified that a number of licensed church workers commenced ministry to children in the audit period prior to being formally appointed by the Diocese of Ballarat. The date those workers commenced ministry has not been recorded and the only information available is anecdotal information provided by Parishes to the effect that they commenced in the audit period.

Accordingly, we have determined there to be non-compliance with the standards of screening in the Canon for the following reasons:

- although the role they perform requires a clearance for ministry to be issued prior to them being licensed, they have commenced ministry to children without a clearance for ministry or licence (they have effectively been 'appointed' as volunteer church workers by the Parish)
- we are unable to determine with sufficient certainty their date of appointment so as to assess whether they have been compliant with the standards of screening, and
- the date by which a safe ministry assessment is said to have occurred is the date a clearance for ministry was issued, being in the majority of cases after they were 'appointed' as volunteer church workers by the Parish.

As a result we have concluded there is non-compliance for this category of worker.

 The Diocese of Ballarat has been non-compliant in screening licenced, authorised or paid church workers in accordance with the Canon in the audit period.

The Diocese of Ballarat should ensure that all licensed, authorised and paid church workers do not commence ministry until they have been formally appointed to their role in accordance with their policies and procedures.

We recognise this can be challenging for Parishes. Volunteers may be identified to help out with ministry to children as a one-off or in an ad hoc fashion to ensure the ministry is able to proceed. These volunteers may also fall within a relevant exemption from a requirement to hold a working with children check.

In Recommendation 2 above we have recommended that the role of Parish Safe Church Officer should have the following minimum functions:

- notifying the Diocesan Safe Church Officer of all people who require a clearance for ministry in a Parish (particularly prospective licensed and volunteer church workers), and
- ensuring that no prospective licensed or volunteer church workers are engaged in ministry to children in a Parish prior to being issued a clearance for ministry.

Renewed focus at the level of the Parish on identifying who is required to be screened and ensuring they are screened prior to appointment and commencement will assist in ensuring that this does not happen again into the future.

As set out in **Annexure B**, despite not being screened in accordance with the Canon (which requires screening to have occurred prior to appointment), at the date of this report, licensed authorised or paid church workers engaged in ministry to children and who commenced in the audit period have subsequently completed the majority of the screening steps as follows:

- 100 per cent have obtained a working with children check
- 100 per cent have undertaken a national register assessment, and
- 100 per cent have undertaken a safe ministry assessment (and a church ministry assessment as necessary).

Again, for this category of worker, this is a high rate of completion of all screening steps and is indicative of a large amount of work by the screening authority to ensure there is compliance at the date of this report.

In addition to those appointed during the audit period, all other licensed, authorised or paid church workers engaged in ministry to children were reviewed for whether or not they have a working with children check, with the result being that 90.9 per cent of all other licensed authorised or paid church workers engaged in ministry to children have a working with children check if required (or a criminal history assessment).

 The Diocese of Ballarat has been partly compliant in screening all licensed, authorised or paid church workers engaged in ministry to children appointed prior to the audit period in accordance with the Canon.

Volunteer church workers

The vast majority of church workers who engage in ministry to children in the Diocese of Ballarat do so as a licensed church workers.

Above we have referred to there being licensed church workers who were effectively appointed as volunteer church workers during the audit period as they commenced ministry prior to a clearance for ministry and licence being issued.

We do not propose to separately report on that category of worker here as the non-compliance relates to their role as licensed church workers. There were no other people appointed as volunteer church workers in sample population in the audit period.

Safe ministry personnel and professional standards personnel

As set out in **Annexure B**, 100 per cent of professional standards personnel and safe ministry personnel undertook the required screening step (a national register assessment) prior to being appointed in the audit period.



The Diocese of Ballarat has been compliant in screening professional standards personnel and safe ministry personnel in the audit period in accordance with the Canon.

Recordkeeping

The standards of screening require that the Diocese of Ballarat keeps accurate and complete records of the screening of clergy and church workers, and that these records are created and maintained in a secure manner.

We have considered primary source documents provided by the Diocese of Ballarat in accordance with the quality assurance process set out in the Audit Framework, including being granted access to their database.

The Diocese of Ballarat had a high level of completeness of information provided which the audit team considers is indicative of good recordkeeping practices.



The Diocese of Ballarat has been compliant in keeping records with respect to the standard of screening in accordance with the Canon.

4 Standards of Training

Standards of training

The standards of training require that clergy, and church workers who engage in ministry to children, undergo accredited training in the three years prior to being appointed (or otherwise).

Training is 'accredited training' if it includes the course content set out in the Safe Ministry Training National Benchmarks and is delivered by people who are accredited, or via online training that is accredited, by the diocesan safe ministry authority. Alternatively, accredited training could be training provided by another Church body that the diocesan safe ministry authority has determined is equivalent.

The standards of training do not apply to those who were appointed (or otherwise) prior to 1 January 2018 (as they were not subject to the Canon at the time this occurred).

However, the standards require that after 1 January 2021 all clergy, and church workers who engage in ministry to children, have received accredited training in the last three years.

Policy Assessment

The diocesan audit is required to assess whether a diocese has:

- standards, and guidelines that give effect to the standards of training (unless there are cogent reasons for not doing so)
- any additional standards and guidelines that are inconsistent with the standards of training, and
- procedures in place which effectively monitor observance by clergy and church workers in the diocese and provide for an appropriate response to instances of non-observance of the standards of training.

Accredited training

For the standards of training we are also required to assess whether training is 'accredited', meaning whether it incorporates the content set out in the Safe Ministry Training National Benchmarks.

We have reviewed the training material delivered during the audit period to clergy, and church workers who engage in ministry to children.

We have notified the Diocese of Ballarat that the training material did not, on the face of the material, address all of the matters set out in the Safe Ministry Training National Benchmarks.

The definition of accredited training is broad enough to include the possibility of the diocesan safe ministry authority recognising training as equivalent. In circumstances where the majority of matters set out in the Safe Ministry Training National Benchmarks were addressed in the training it is reasonable for the diocesan safe ministry authority to conclude it is equivalent and accordingly is 'accredited training' within the meaning of the Canon.

In response to that feedback, the Diocese of Ballarat has authorised the use of training material provided by Safe Ministry Resources Pty Ltd (**SMR**), a safe ministry service provider. The training materials created by SMR have been created with reference to:

- the Safe Ministry Training National Benchmarks of the Anglican Church of Australia, and
- the minimum standards required under the Safe Church Training Agreement (**SCTA**), an interdenominational training agreement under the auspices of the National Council of Churches in Australia (**NCCA**).

The training offered by SMR includes an 'essentials' or introductory training, and then a 'refresher' training to be completed every three years after having completed the 'essentials' course.

We confirm that the training material incorporates the content set out in the Safe Ministry Training National Benchmarks. Accordingly, on the basis this training program is also accredited by the diocesan safe ministry authority, we conclude the training constitutes 'accredited training' within the meaning of the Canon.

The policies and procedures of the Diocese of Ballarat that give effect to the standards in the Canon are as follows:

- Clearance for Ministry Protocol, and
- Guidelines for Screening and Licencing for Ministry.

Clearance for Ministry Protocol

As described above at Part 3, The Clearance for Ministry Protocol gives effect to the requirement in the Professional Standards Act that clergy and church workers be assessed for suitability for ministry and are to be issued a clearance for ministry. The requirement to complete accredited training is listed in Schedule A to the Protocol in the explanatory notes as follows:

- all members who require a clearance for ministry must attend and maintain currency in accredited training and any other training as specified by diocesan policy, and
- accredited training is to be done every three years for laity and every two years for candidates for ordination and clergy.

We have raised with the Diocese of Ballarat that it is unclear in the Clearance for Ministry Protocol:

- whether satisfactory completion of accredited training is a requirement prior to being issued a clearance
- how the Diocese determines whether there are exceptional circumstances warranting the clearance being issued without accredited training being complete, and

- what the consequences are for not attending accredited training.

The requirement that accredited training be conducted or renewed in periods of two or three years give effect to the standards of training that accredited training be delivered at intervals of not more than three years.

Guidelines for Screening and Licencing for Ministry

The policy document called Guidelines for Screening and Licencing for Ministry provides the same information as set out in Schedule A to the Clearance for Ministry Protocol. Additionally, the Guidelines require all leaders to attend accredited training within their first year of leadership.

We consider this attendance requirement to be inconsistent with the standards of training which requires that clergy and church workers subject to the Canon attend accredited training within three years prior to appointment (and in exceptional circumstances within three months of appointment).

Other categories of worker are also required to complete accredited training, including workers who do not fall within the scope of the Canon. This does not create an inconsistency with the Canon.

The Diocese of Ballarat monitors observance of compliance with the standards of training via the same architecture used to monitor observance with the standards of screening. The date of attendance at accredited training is entered into the Safety Management Online, with automatic renewal notices sent prior to expiry of the relevant training renewal period.

Given the inconsistency identified in relation to the requirement training be conducted after appointment we cannot conclude that the Diocese of Ballarat has in place policies and procedures that give effect to the standards of training.

We note that the move to online training may make the completion of accredited training prior to appointment more efficient as workers are not required to wait until a scheduled training event in the local area.

When read together, the policies and procedures of the Diocese of Ballarat:

- do not require that the standards of training are complied with prior to clergy and church workers being appointed (or otherwise) to a ministry position, and
- do not require that clergy or church workers are unable to undertake ministry to children until they have been appropriately trained.

However, the Diocese of Ballarat has a system of monitoring compliance once training has been completed.

 The Diocese of Ballarat does not yet have in place policies and procedures that give effect to the standards of training.

 The policies and procedures of the Diocese of Ballarat do not contain any additional standards that are inconsistent with the standards of training in the Canon.

 The Diocese of Ballarat has procedures in place which effectively monitor observance by clergy and church workers in the diocese, and provide an appropriate response to instances of non-observance of the standards of training.

The clearance for ministry issued by the Diocese of Ballarat provides a mechanism by which the Diocese of Ballarat can ensure that clergy and church workers engaged in ministry to children have satisfactorily completed accredited training prior to being appointed (or otherwise) to their role.

Recommendation 5

The Diocese of Ballarat should ensure that prior to a clearance for ministry being issued in relation to clergy, or a church worker engaged in ministry to children, that they have satisfactorily completed accredited training in accordance with the standards of training.

Material Compliance Assessment

General

The audit team has requested that the Diocese of Ballarat provide us de-identified information in relation to all candidates for ordination, clergy, and a sample of licenced, authorised or paid church workers and volunteer church workers appointed (or otherwise) in the audit period.

Assessment

We have reviewed the information provided by the Diocese of Ballarat relating to all categories of worker subject to the standards of training in the Canon. The requirement in the Canon is that persons undergo training within three years prior to appointment (and in exceptional circumstances within 3 months of appointment).

We consider that accredited training prior to appointment is important to ensure that people are equipped with practical information to assist them in providing ministry to children which informs them of the expected standards of behaviour required of them, but also the kinds of behaviours to be alert for in other people and in children which may be cause of concern.

In the case of the Diocese of Ballarat, the audit period is the period immediately after the Canon has come into effect. A consequence of this is that:

- there was not previously a requirement to undergo accredited training in the years prior to Canon

- those people we have assessed have therefore had less opportunity to receive accredited training than those people that will be audited in later audit periods, and
- the information captured on the Diocese of Ballarat’s database relates primarily to training that occurred in the audit period and does not capture historic training that may have occurred for each worker such that they are compliant.

As set out in **Annexure B**, and based on the information provided by the Diocese of Ballarat, the following categories of worker undertook accredited training prior to or within three months of appointment as follows:

- 16.7 per cent of candidates for ordination
- 20 per cent of licensed clergy
- 63.6 per cent of licensed, authorised or paid church workers engaged in ministry to children, and
- 100 per cent of safe ministry personnel and professional standards personnel.

 The Diocese of Ballarat has been non-compliant in training candidates for ordination, clergy, licensed, authorised or paid church workers engaged in ministry to children, and safe ministry personnel and professional standards personnel in the audit period in accordance with the Canon.

 The Diocese of Ballarat has been compliant in training safe ministry personnel and professional standards personnel in the audit period in accordance with the Canon.

However, we note that at the time of this audit report there are high levels of completed accredited training for those categories of workers appointed during the audit period:

- 100 per cent of candidates for ordination
- 72 per cent licensed clergy
- 100 per cent of safe ministry personnel and professional standards personnel.

Recordkeeping

The standards of training require that the Diocese of Ballarat keeps accurate records of the satisfactory completion of accredited training by clergy and church workers, and that these records are created and maintained in a secure manner.

We have reviewed the information provided by the Diocese of Ballarat as against the information recorded in their database as to attendance at accredited training. We have also viewed hard copy documents that evidence attendance and completion of accredited training. On the basis of the information we have considered we conclude the records are complete and accurate.

 The Diocese of Ballarat has been compliant in keeping records with respect to the standards of training in accordance with the Canon.

5 Standards of safe ministry with persons of concern

Standards of safe ministry with persons of concern

The standards of safe ministry with persons of concern require that a parish or a congregation take the actions required to implement the process specified in section 5 of the document titled 'Policy for Safe Ministry in a parish where there is a risk of sexual abuse by a Person of Concern' dated 16 June 2017 (**Persons of Concern Policy**).

In the case of a congregation this process may be adapted by the diocesan safe ministry authority so as to apply to a congregation. The standards of safe ministry with persons of concern came into effect on 1 January 2019.

Section 5 of the Persons of Concern Policy requires that each parish and/or congregation adopts a process consisting of each of the following stages:

- Stage 1** - Identify a Person of Concern
- Stage 2** - Notify the Director of Professional Standards
- Stage 3** - Develop an Interim Safety Plan
- Stage 4** - Decide Whether to Proceed Further
- Stage 5** - Conduct the necessary assessments
- Stage 6** - Establish the necessary safeguards
- Stage 7** - Monitor the arrangements made

Policy Assessment

The diocesan audit is required to assess whether a diocese has:

- standards, and guidelines that give effect to the standards of safe ministry with persons of concern (unless there are cogent reasons for not doing so)

- any additional standards and guidelines that are inconsistent with the safe ministry with persons of concern, and
- procedures in place which effectively monitor observance by clergy and church workers in the diocese and provide for an appropriate response to instances of non-observance of the safe ministry with persons of concern.

The policies and procedures of the Diocese of Ballarat that give effect to the standards in the Canon are the Persons of Concern Policy which is in effect in the Diocese. In 2019, the Diocese provided training to all clergy in relation to persons of concern.

 The Diocese of Ballarat has in place standards and guidelines that give effect to the standards of safe ministry with persons of concern.

 The Diocese of Ballarat does not have any additional standards and guidelines that are inconsistent with the standards of safe ministry with persons of concern.

 The Diocese of Ballarat has procedures in place that effectively monitor observance by clergy and church workers in the diocese of the standards of safe ministry with persons of concern and provide for an appropriate response to instances of non-observance.

Material Compliance Assessment

General

The audit team has requested that the Diocese of Ballarat provide us de-identified information in relation to all Persons of Concern that have come to the notice of clergy or church workers at any point during the audit period.

Assessment

As part of our assessment we have considered information provided by the Diocese of Ballarat in relation to persons of concern. We note that there is a worshipping agreement in place that has been reviewed since 1 January 2019 and we have reviewed that document.



The Diocese of Ballarat has been compliant in managing persons of concern in accordance with the standards of safe ministry with persons of concern from 1 January 2019.

Recordkeeping

In respect of recordkeeping, the Diocese of Ballarat stores both hard and soft copies of safety plans with the Director of Professional Standards and the diocesan safe ministry authority.



The Diocese of Ballarat has kept accurate records in relation to the standards of safe ministry with persons of concern, which have been created and maintained in a secure manner.



Contact

Please do not hesitate to contact a member of the audit team to discuss any aspect of this report.

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About Prolegis Lawyers

Prolegis is a specialist law firm that exclusively advises clients around Australia and overseas in relation to the charity, not-for-profit and philanthropic sectors.

Prolegis has experience undertaking compliance audits of large charities and not-for-profit organisations, including denominations and other large faith-based organisations.

Annexure A

Glossary of terms

This Annexure A to the document titled '*Safe Ministry to Children Canon 2017: Report of the diocesan audit of the Diocese of Ballarat*' sets out a glossary of terms used in the report, and which are also used in the Canon and the Audit Framework.

Accredited training means:

- training that:
 - includes the course content in the Safe Ministry Training National Benchmarks so far as it relates to ministry to children, with reasonable adjustments for cultural, linguistic and ability diversity, and
 - is delivered by persons who are accredited, and/or online training which is accredited, by a diocesan safe ministry authority, or
- training of another Church body or organisation that a diocesan safe ministry authority has determined is equivalent to the training above.

Canon means the Safe Ministry to Children Canon 2017

Church means the Anglican Church of Australia

Church authority has the same meaning as in the National Register Canon 2007

Church body means any body corporate, organisation or association that exercises ministry within, or on behalf of, or in the name of, the Church, and is controlled by a diocese or province or the General Synod

Church ministry assessment means a reasonable endeavour made to obtain information about the person from the responsible authority, and if obtained consideration of that information

Church worker means a lay person undertaking any ministry to children:

- who is licensed or authorised by the bishop of a diocese, or
- who is employed by a Church body, or
- who, for payment or not, holds a position or performs a function with the actual or apparent authority of a Church authority or Church body

Clergy means a person who is a bishop, priest or deacon in the Church

Code of conduct means a code of conduct for safe ministry to children

Cogent means clear, logical and convincing

Criminal history assessment means consideration of a National Police History Check of the person

Diocesan audit means an audit as to whether:

- any diocesan code of conduct containing additional standards of conduct for observance, and additional guidelines for conduct to be followed, is inconsistent with the standards of conduct and the guidelines for conduct contained in the prescribed code of conduct, or an equivalent code of conduct in respect of which the Standing Committee has made a determination under section 5(3) of the Canon
- a diocese has standards, and guidelines unless there are cogent reasons for not doing so, that give effect to the prescribed standards and guidelines
- a diocese has in place procedures which:
 - effectively monitor observance by clergy and church workers in the diocese of the standards, and guidelines unless there are cogent reasons for not doing so, applicable to them that give effect to the prescribed standards and guidelines, and
 - provide for an appropriate response to instances of non-observance
- the procedures in place above have, in all material respects, been followed, and
- any additional standards and guidelines for safe ministry to children prescribed by a diocese are inconsistent with the prescribed standards and guidelines, or equivalent standards and guidelines applicable to a Church body in respect of which the Standing Committee has made a determination under section 9(3) of the Canon

Diocesan safe ministry authority means a Church body with responsibility for safe ministry to children in a diocese, and where not established is the diocesan council

Faithfulness in Service means Faithfulness in Service: A national code for personal behaviour and the practice of pastoral ministry by clergy and church workers as tabled at the 17th ordinary session of the General Synod held in 2017

Independent person means a person who:

- is not a member of the clergy or a church worker (with reference to the definition of Church worker in the National Register Canon 2017), and
- has experience in undertaking audits of a similar nature to a General Synod audit and a diocesan audit

Licence means a licence, an authority, or a permission to officiate, issued by the bishop of a diocese

Ministry to children means work of a kind where a person:

- is required to hold a working with children check, or a working with vulnerable people check by reason that the person has contact with a child as part of engaging in a regulated activity, or
- exercises a pastoral ministry which has direct, regular and not incidental contact with children, or
- provides services to children that are ancillary to the exercise of a pastoral ministry within the paragraph above which involve:
 - contact with children during an overnight activity (such as camps and similar activities), or
 - close, personal contact with children (such as changing clothes, washing and toileting), or
- supervises the ministry of a person within any one or more of paragraphs above, or
- performs a professional standards role, or
- performs a safe ministry role

Medical assessment means consideration of a medical report of the person by a registered medical practitioner

National Register means the National Register established under the National Register Canon 2007

National register assessment means a check whether there is any information about the person entered in the National Register, and if so consideration of that information

Pastoral ministry includes the provision of spiritual advice and support, education, counselling, medical care, and assistance in times of need

Person of Concern is a person who is currently participating or wishes to participate in the life of a parish or congregation and whose presence constitutes a risk of harm from sexual abuse to others in the parish or congregation

Persons of Concern Policy means the Policy for Safe Ministry in a parish where there is a risk of sexual abuse by a Person of Concern as tabled at the 17th ordinary session of the General Synod held in 2017

Professional standards personnel means clergy and church workers performing a professional standards role

Professional standards process has the same meaning as in the Episcopal Standards (Child Protection) Canon 2017

Professional standards role means a role in:

- recommending or determining whether an action is to be taken, or
- providing support to a person,

under a professional standards process

Province means a member church of the Anglican Consultative Council other than this Church and includes part of a Province

Psychological assessment means consideration of a psychological report that includes an assessment of psychosexual maturity of the person by a registered psychologist

Responsible authority means:

- a provincial authority, or
- a diocesan authority, or
- a denominational authority

Risk assessment means a risk assessment provided by the Department for Communities and Social Inclusion Screening Unit of South Australia (during the relevant period)

Safe ministry assessment means consideration of the person's completed Safe Ministry Check, and if applicable referees' completed Safe Ministry Checks

Safe Ministry Check means a check that includes the applicable Safe Ministry Check as tabled at the meeting of the Standing Committee held on 9-10 November 2018

Safe ministry personnel means clergy and church workers performing a safe ministry role

Safe ministry role means a role:

- in recommending or determining standards and guidelines for safe ministry to children or with Person of Concern, or
- in recommending or determining or supervising safe ministry in a parish or congregation with a Person of Concern,

but excludes a role as a member of the synod of the diocese and, if a diocese has established a diocesan safe ministry authority separate from its diocesan council excludes a role as a member of the diocesan council

Safe Ministry Training National Benchmarks means the Safe Ministry Training National Benchmarks as tabled at the 17th ordinary session of the General Synod held in 2017

Screening authority means:

- in the case of a person to be ordained as a deacon, or a member of the clergy to be licensed, or a church worker to be licensed or authorised, the bishop of the diocese or his or her delegate, or
- in the case of a member of the clergy to be elected or appointed as the bishop of the diocese, the electing or appointing body or its delegate, or
- in the case of a church worker to undertake paid or voluntary ministry to children, the appointing person or body or their delegate, or
- in the case of a professional standards personnel and safe ministry personnel, the electing or appointing body or its delegate

Annexure B

Material compliance assessment information

This Annexure B to the document titled '*Safe Ministry to Children Canon 2017: Report of the diocesan audit of the Diocese of Ballarat*' sets out information considered as part of the material compliance assessment of that diocesan audit.

Table 1: Compliance with standards of screening in the audit period (by percentage of category of worker)

Category of worker	WWCC (or criminal history assessment)		National register assessment		Safe ministry assessment[1]		Psychological assessment		Medical assessment	
	Prior to appt [2]	Prior to report [3]	Prior to appt	Prior to report	Prior to appt	Prior to report	Prior to appt	Prior to report	Prior to appt	Prior to report
Candidates for ordination	50.0	100.0	33.3	100.0	33.3	100.0	0.0	0.0	0.0	0.0
Licensed clergy	88.0	100.0	80.0	100.0	60.0	100.0	N/A	N/A	N/A	N/A
Licensed, authorised, paid church workers[4]	N/A	100.0	N/A	100.0	N/A	100.0	N/A	N/A	N/A	N/A
Volunteer church workers[5]	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Safe ministry personnel[6]	100.0	100.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes

[1] **Safe ministry assessments:** A church ministry assessment ordinarily occurs at the same time as a safe ministry assessment, which is reflected in the primary source material we have reviewed, and accordingly we have not reported on this figure separately.

[2] **'Prior to appt' column:** The prior to appointment column under each screening step sets out the percentage of each category of worker who completed the relevant screening step prior to the date that they were appointed (or otherwise) to their role. The standards of screening require that each category of worker be screened prior to appointment (or otherwise). This is the percentage figure that our compliance assessment is based upon.

[3] **'Prior to report' column:** The prior to report column under each screening step sets out the percentage of each category of worker who completed the relevant screening step prior to the date of this report.

[4] **Licensed, authorised, or paid church workers:** We are unable to report on the level of compliance for licensed, authorised or paid church workers during the audit period due to the majority commencing ministry prior to appointment. We have concluded non-compliance for reasons set out in the report.

[5] **Volunteer church workers:** There were no volunteer church workers appointed in the audit period.

[6] **Safe ministry personnel:** Includes professional standards personnel as relevant

Table 2 sets out material compliance information relating to licensed clergy, and licensed, authorised or paid church workers engaged in ministry to children, who were appointed (or otherwise) outside the audit period (in most cases prior to 1 January 2018).

The Canon requires a material compliance assessment of these categories of worker to assess whether they have a working with children check if required, and if not required a criminal history assessment.

Table 2: Compliance with standards of screening outside the audit period (by percentage of category of worker)

Category of worker	WWCC (or criminal history assessment)
Licensed clergy	100.0
Licensed, authorised, or paid church workers	90.9

Table 3 sets out material compliance information relating to the satisfactory completion of accredited training by percentage of category of worker.

The Canon requires a material compliance assessment of whether each category of worker has undergone accredited training within three years prior to their date of appointment (or otherwise) to their role, or in certain circumstances within three months after the relevant date of appointment.

Table 3: Compliance with standards of training in the audit period (by percentage of category of worker)

Category of worker	Accredited training	
	Prior to appt [1]	Prior to report [2]
Candidates for ordination	16.7	100.0
Licensed clergy	20.0	72.0
Licensed, authorised, or paid church workers	63.6	63.6
Volunteer church workers	N/A	N/A
Safe ministry personnel[3]	0.0	0.0

Notes

[1] **'Prior to appt' column:** The prior to appointment column under accredited training sets out the percentage of each category of worker who satisfactorily completed the relevant training step prior to the date that they were appointed (or otherwise) to their role, or within three months after that date.

[2] **'Prior to report' column:** The prior to report column under accredited training sets out the percentage of each category of worker who satisfactorily completed the relevant training step between the period 3 months after their date of appointment and the date of this report.

[3] **Safe ministry personnel:** Includes professional standards personnel as relevant.

Compliance thresholds & materiality

As part of the material compliance assessment, the diocesan audit has adopted the following compliance thresholds.

Standards of screening

Full Compliance	Every person in each category has undergone the required screening steps prior to appointment .
Partial Compliance	<p>More than 90 per cent of the total people in each category have undergone the required screening steps prior to appointment.</p> <p>Less than 10 per cent of the total people in each category have undergone the required screening steps:</p> <ul style="list-style-type: none"> • prior to appointment in relation to legislative requirements; AND • prior to the audit for the remaining steps, OR • there is a cogent reason provided for why they have not.
Non-compliance	<p>Less than 90 per cent of people in each category have undergone the required screening steps prior to appointment.</p> <p>More than 10 per cent of people in each category have not undergone the required screening steps:</p> <ul style="list-style-type: none"> • prior to the audit, AND • there is no cogent reason provided why they have not.

Standards of training

Full Compliance	Every person in each category has undergone accredited training prior to appointment or as otherwise allowed.
Partial Compliance	<p>More than 70 per cent of the total people in each category have undergone accredited training prior to appointment or as otherwise allowed.</p> <p>Less than 20 per cent of the total people in each category have undergone accredited training:</p> <ul style="list-style-type: none"> • prior to the audit or as otherwise allowed, OR • there is a cogent reason provided for why they have not. <p>Less than 10 per cent of the total people in each category have not undergone accredited training and there is no cogent reason why they have not.</p>
Non-compliance	<p>Less than 70 per cent of the total people in each category have undergone accredited training prior to appointment or as otherwise allowed.</p> <p>More than 10 per cent of the total people in each category have not undergone accredited training:</p> <ul style="list-style-type: none"> • prior to the audit, AND • there is no cogent reason provided why they have not.



Standards of safe ministry with persons of concern

Full Compliance	Every person of concern that has come to the notice of clergy or church workers after 1 January 2019 has been managed in accordance with section 5 of the Persons of Concern Policy.
Partial Compliance	<p>For every person of concern that has come to the notice of clergy or church workers after 1 January 2019, stages 1 to 3 of the process set out in section 5 of the Persons of Concern Policy has been observed in some form at the time of the diocesan audit.</p> <p>In respect of stage 3, even if a diocese has not implemented a formal Interim Safety Plan (as that term is defined in the Persons of Concern Policy), we will consider the substance of stage 3 to have been satisfied if there is evidence that the relevant member of clergy and the Director of Professional Standards has implemented a plan to manage the situation with respect to the relevant person of concern, and that this plan has been:</p> <ul style="list-style-type: none">• agreed between the Director of Professional Standards and the relevant member of clergy or church worker• documented in writing, and• communicated to the relevant parties.
Non-compliance	The procedure in respect of a person of concern is complete (and not still in process), and there are persons of concern that have not undergone the steps set out at 1-3 of section 5 of the Persons of Concern Policy (or an equivalent procedure) and there is no cogent explanation provided for why they have not undergone the required process.

Recordkeeping

In relation to each of the prescribed standards and guidelines, whether records have been kept as follows:

Full Compliance	The diocese has kept accurate and complete records in respect of the prescribed standards and guidelines and they been created and maintained in a secure manner.
Partial Compliance	The diocese has kept accurate and mostly complete records in respect of the prescribed standards and guidelines and they been created and maintained in a secure manner.
Non-compliance	The diocese has not kept accurate records in respect of the prescribed standards and guidelines and they not been created and maintained in a secure manner.