

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

October 2025

1 Executive summary

In late 2017, the Synod of the Diocese of Bunbury 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 Bunbury.

We wish to extend thanks to the officers of the Diocese of Bunbury, particularly The Venerable Geoff Chadwick, and Tiffany Della-Vedova, Diocesan Safe Church Officer for their assistance over the course of the diocesan audit.

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 Bunbury 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 Bunbury has in practice complied with the standards in the Canon in the period from 1 July 2023 to 30 June 2024 (the **audit period**).

The approach by the Diocese of Bunbury to compliance with the Canon is informed by the legislative context in which they operate, and the administrative systems available to implement and monitor the standards. Where possible this has been taken into account.

For more information about the 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 Bunbury contains additional standards or guidelines that are inconsistent with the prescribed code of conduct or any equivalent code of conduct.

We reviewed the version of Faithfulness in Service in effect in the Diocese. We also reviewed other policy documents which set out expected standards of behaviour.

The following findings were made:



The Diocese of Bunbury does not have any diocesan codes of conduct that contain additional standards and guidelines that are inconsistent with the prescribed code of conduct.

Standards of screening

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

The policies and procedures in place in the Diocese of Bunbury:

- address most of the categories of worker covered by the standards of screening,
- assign responsibility to identified persons to ensure the standards of screening are complied with, and
- include information about recordkeeping practices.

The following findings were made:



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



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



The Diocese of Bunbury 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.

Also in Part 3, we have assessed whether the Diocese of Bunbury has complied with the standards of screening in practice throughout the audit period based on the information provided to us by the Diocese of Bunbury.

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

- the assessment is not an assessment of whether the Diocese of Bunbury has complied with the *Working with Children (Criminal Record Checking) Act 2004 (WA)* as there may be differences between the appointment dates we are assessing and commencement of child-related work within the meaning of that act,
- the findings reflect the levels of compliance with the screening standards in the Diocese of Bunbury during the audit period,

- 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,
- the material compliance assessment is based on the information available at the time of conducting the diocesan audit, and there may be further information available which would change these results,
- some of the findings relate to categories of worker where there were only a small number of people that fell into that category, and in those circumstances non-compliance in respect of one or two people may have had a disproportionate impact on the total compliance result for that category, and
- the findings reflect the thresholds developed as part of the Audit Framework which, for the most part, require 100 per cent compliance in order for a finding of compliance to be made.

The following findings were made in respect to persons licensed or appointed in the audit period:



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



The Diocese of Bunbury has been partly compliant in screening clergy in accordance with the Canon in the audit period.



The Diocese of Bunbury has been compliant in screening licensed, authorised and paid church workers in accordance with the Canon in the audit period.



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

At the date of the audit all screening steps for clergy and licensed, authorised and paid church workers had occurred. Non-compliance in respect of clergy was largely a result of the availability of national register assessment information for a small number of retired clergy. However, this does not mean that those clergy were not subject to that screening step, only that the information was not available at the time of the audit. Notwithstanding this, we observed high-levels of compliance with the screening steps across all categories of worker.

Overall, the high level of compliance reflects the resourcing that the Diocese of Bunbury has committed to this area. This result is driven by both dedicated volunteers in each of the parishes and by the Diocesan Office.

In addition to those who were licensed or appointed in the audit period, we have assessed whether other licensed clergy and church workers engaged in ministry to children hold a working with children check (or criminal record assessment as the case may be):



The Diocese of Bunbury has been compliant in screening current clergy licensed outside the audit period in accordance with the Canon.



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

Standards of training

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

The policies and procedures of the Diocese of Bunbury:

- require that the standards of training are complied with prior to clergy and church workers (other than volunteers) being appointed (or otherwise) to a ministry position,
- require that clergy or church workers (other than volunteers) not undertake ministry to children until they have been appropriately trained, and
- assign responsibility to identified persons to monitor this and include mechanisms to report non-compliance by clergy and church workers.

The following findings were made:



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



The Diocese of Bunbury does not have policies and procedures that contain additional standards that are inconsistent with the standards of training.



The Diocese of Bunbury 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 training.

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

The following findings were made:



The Diocese of Bunbury has been compliant in training candidates for ordination in the audit period in accordance with the Canon.



The Diocese of Bunbury has been compliant in training licensed clergy in the audit period in accordance with the Canon.



The Diocese of Bunbury has been compliant in training in screening licensed, authorised and paid church workers engaged in ministry to children in the audit period in accordance with the Canon.

Overall, the high level of compliance reflects significant investment in safe ministry training over a long period of time.

Standards of safe ministry with persons of concern

In Part 5, we have reviewed the approach of the Diocese of Bunbury to safe ministry with persons of concern.

The following findings were made:



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



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



The Diocese of Bunbury 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 Bunbury has complied with the standards of safe ministry with persons of concern in practice throughout the audit period based on information provided to us by the Diocese of Bunbury.

The following findings were made:



The Diocese of Bunbury has been compliant in managing persons of concern in accordance with the standards of safe ministry with persons of concern in the audit period.

Conclusion

Overall, we conclude that the Diocese of Bunbury has demonstrated significant progress in embedding the standards set out in the Canon in policy and procedure.

The audit team observed a commitment to safeguarding by diocesan personnel, and considers that a culture of safeguarding is well established in the Diocese.

The compliance outcomes are significant in circumstances where the Diocese of Bunbury has limited resources. In our view, the compliance outcome is indicative of the commitment and culture of the Diocese.

The audit team is satisfied that the approach adopted by the Diocese of Bunbury will position it well to achieve continued compliance with prescribed standards and guidelines in the Canon into the future.

2 Background

The Diocese of Bunbury

Established on 17 July 1904, the Diocese of Bunbury is one of the 23 dioceses of the Anglican Church of Australia, and one of three dioceses (along with the Diocese of Perth and Diocese of North West Australia) that comprise the Province of Western Australia.

The Diocese of Bunbury covers a large geographical area (225,000 square kilometres) that encompasses remote, rural and regional areas in the South West of Western Australia, with the majority of people located in regional towns along the coast. The Diocesan Office, or central administrative hub, is collocated with St Boniface Cathedral in Bunbury.

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

- 31 Parishes and 5 Anglican Communities,
- approximately 3,900 church members, and
- 42 active clergy and 39 retired clergy.

Some of the challenges in implementing the requirements set out in the Canon in the Diocese of Bunbury include:

- the lack of access to the internet in some locations,
- a reliance on volunteers at the parish level, with varying capacity in terms of human resourcing, and
- regular turnover in volunteers.

The Diocese of Bunbury has adopted a 'continuous improvement' approach to implementing the requirements set out in the Canon. A 'continuous improvement' or 'quality assurance' approach emphasises the positive steps taken to improve systems of compliance over a more prescriptive or rigid approach.

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 Bunbury, 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,
- policies in relation to other vulnerable people, including those who have experienced family and domestic violence, and
- redress options for those who have experienced abuse, including via:
 - the National Redress Scheme for Institutional Child Sexual Abuse, and
 - a Diocesan Redress Scheme, which is managed independently of the Diocese of Bunbury, and is not limited to those who have experienced child sexual abuse only.

Legislative context

In addition to their internal policies and procedures, the Diocese of Bunbury is subject to legislative obligations in force in Western Australia, including:

- *Working with Children (Criminal Record Checking) Act 2004* (WA), and
- *Working with Children (Criminal Record Checking) Regulations 2005* (WA).

We discuss the interaction between these obligations and the standards in the Canon in further detail in Part 3 of this report.

The Canon

The object of the Canon is to prescribe a code of conduct and minimum standards and guidelines for safe ministry to children.

The Canon follows the previous commitments made by the General Synod:

- in 2004, to the physical, emotional and spiritual welfare of all people, particularly within its own community (see the Safe Ministry Policy Statement), and
- in 2014, to promote a culture of safety throughout the church (see the Charter for the Safety of People within the Churches of the Anglican Communion).

Diocesan audit

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

Prescribed code of conduct

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?

The diocesan audit involves two kinds of assessment:

The first is an assessment of the policies and procedures of the diocese as compared with the **prescribed code of conduct and prescribed standards and guidelines** (the **Policy Assessment**).

The second is an assessment of material compliance with the **prescribed standards and guidelines** (the **Material Compliance Assessment**).

Public reporting of compliance with the standards set out in the Canon is one way in which the Diocese of Bunbury is accountable and transparent about the efforts made by it to improve child safe practices. The audit of adherence by the Diocese of Bunbury 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 Bunbury (as part of the Anglican Church of Australia) is committed to safe ministry to children.

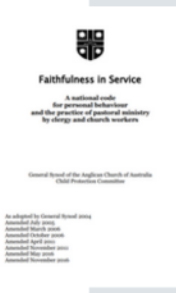
The diocesan audit is consistent with the encouragement of the Royal Commission into Institutional Responses to Child Sexual Abuse (**Royal Commission**) for religious organisations to publicly report on the implementation of, and compliance with, standards of safe ministry to children.

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.

3 Prescribed code of conduct

Prescribed code of conduct

Clergy and church workers in the Diocese of Bunbury (with limited exceptions) 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.

Diocesan codes of conduct

As set out in part 2 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.

In short, 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.

There are currently two approved diocesan codes of conduct in force in the Diocese of Bunbury:

1. Faithfulness in Service, adopted in October 2019 by the Synod of the Diocese of Bunbury as a diocesan code of conduct for all clergy, and
2. Being Together Code of Conduct, adopted by the Synod of the Diocese as a code of conduct for all members of the church community.

Policy assessment

Being Together

We have reviewed Being Together, which is described as being focused on the behaviour of individuals in the church community. It adopts the guiding principles agreed upon by the Anglican Church of Australia and includes specific guidelines which are designed to meet the needs of the Diocese of Bunbury.

The standards in the guidelines set out in Being Together are complementary to those in the prescribed code of conduct.

Faithfulness in Service

As indicated above, the relevant parts of Faithfulness in Service adopted by the Diocese of Bunbury as a diocesan code of conduct are identical with the prescribed code of conduct.



The Diocese of Bunbury does not have any diocesan codes of conduct that contain additional standards and guidelines that are inconsistent with the prescribed code of conduct.

4 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 (other 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, and
 - 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, 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 which may also differ across jurisdictions, for example, volunteer church workers are eligible to hold conditional working with children checks or working with vulnerable people checks in jurisdictions other than Western Australia, 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

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

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 Bunbury that give effect to the standards in the Canon are as follows:

- The Licensing Statute 2017-2018 (the **Licensing Statute**),
- The Parochial Statute,
- The Selection and Accreditation of Lay Parish Church Workers Policy,
- The Screening Policy, and
- The Psychological and Medical Assessment for Ordinands Policy.

The Licensing Statute and Parochial Statute together describe a system of screening with the following features:

- for clergy screening occurs centrally at the Diocesan Office, which is responsible for, and administers, the issuance of licences and permissions to officiate to clergy, and licences to lay ministers,
- for licenced church workers and volunteer church workers, the Parish and Diocesan Office are jointly responsible for ensuring screening occurs, and
- for paid church workers engaged in a Parish, the Parish is responsible for ensuring screening occurs, with some oversight from the Diocesan Office and also the Trustees of the Diocese who are the employer of church workers.

At a high-level, the system of screening ensures that there are responsible persons at both a central level and a local level who are able to monitor observance of the standards of screening and provide appropriate responses to instances of non-observance.

The Licensing Statute

The Licensing Statute requires that clergy and licenced church workers meet the safe church requirements of the Diocese prior to being issued a licence or a permission to officiate (for clergy), or a licence as a church worker (referred to as licenced lay ministers). The statute is non-specific about the child safe requirements of the Diocese of Bunbury. Instead, the specific detail is set out in the Screening Policy.

The Licensing Statute contains additional standards of screening, including:

- the Bishop must make enquiries and formally check references concerning applicants for clergy, and
- applicants for licenced lay ministry must:
 - be recommended by the Priest-in-charge of their Parish after consultation with the Parish Council,
 - have their names published to the Parish and any objections sought, and
 - have attended the parish for a minimum period of 12 months.

We do not consider these additional standards to be inconsistent with the standards of screening in the Canon. The additional standards in relation to licenced church workers reflect the fact that most people have an existing relationship with the local Parish prior to engaging in ministry.

The Licensing Statute allows the Bishop to waive any of the screening requirements that relate to licensing church workers. It is understood that some licenced lay ministers will hold a licence to conduct ministry in a particular setting that does not involve ministry to children.

The Parochial Statute

Ministry that occurs in a Parish context is governed by the Parochial Statute. The statute sets out a screening regime that includes:

- a Safe Church Contact Person and an Oversight Committee in each Parish to be responsible for ensuring that proper processes for screening are followed,
- all licenced clergy and licenced, authorised, paid and volunteer church workers engaged in ministry to children in a Parish are required to meet the following requirements prior to taking up a position in the Parish,
 - attended the parish for a minimum period of 12 months (presumably this applies to church workers only),
 - completed a safe ministry check by completing the appropriate form nominated by the Diocese,
 - provided a Volunteers National Police Clearance Certification (presumably this applies to volunteer church workers only), and
 - completed a National Register check, and
- church workers are to sign a declaration in relation to the diocesan code of conduct and that they understand they are not to be appointed until all of the safe church compliance requirements are in place.

We have reviewed the relevant forms described in the Screening Policy and are satisfied they accord with the forms referenced in the Canon. Accordingly, an assessment of those forms would constitute a safe ministry assessment within the meaning of the Canon.

Screening Policy

The Screening Policy expressly seeks to give effect to the standards and guidelines in the Canon. The policy:

- nominates the safe ministry assessment forms, referred to as a 'Safe Ministry Check' for each category of worker,
- provides information about the approach of the Diocese of Bunbury to the practical arrangements for monitoring observance and responding to non-observance of clergy and church-workers, and
- sets out the approach of the Diocese of Bunbury to adverse assessments.

In relation to each category of worker, the Screening Policy sets out as follows:

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



Consistent with the standards of screening in the Canon.

Table 1: Standards of screening in the Diocese of Bunbury

For those applying from overseas, the Diocese requires a police clearance from their country of residence, the Professional Standards Director will also make enquiries in addition to those reference checks made as part of the Safe Ministry Check.

The Screening Policy 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. A police check is a useful screening tool for other issues that may be relevant to a person's suitability for ministry.

Selection and Accreditation of Lay Parish Church Workers Policy

The Diocese of Bunbury sets out the process of selecting people for ministry positions in the Selection and Accreditation of Lay Parish Church Workers Policy (**Selection and Accreditation Policy**).

In summary, the Selection and Accreditation Policy sets out the following additional screening standards (or steps) to those set out in the Canon. The Oversight Committee is to:

- identify all ministry roles and have role descriptions,
- assess the risk of potential harm relating to each role,
- interview the applicant, and
- contact referees (although this is envisaged in the Safe Ministry Check).

The Psychological and Medical Assessment for Ordinands Policy

The Psychological and Medical Assessment for Ordinands Policy (the Psychological and Medical Assessment Policy) sets out the requirement of the Diocese that candidates for ordination undergo a psychological assessment and a medical assessment prior to ordination.

The Psychological and Medical Assessment Policy is detailed as to the types of matters that should inform each assessment and the stage in which it occurs as part of the process overseen by the Ordination Council of the Diocese. The policy sets out the types of records that should be kept.

The steps envisaged by the Psychological and Medical Assessment Policy are also reflected in the Diocese's application for Holy Orders and student record forms.

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

	Working with children check	National Police clearance	National register check	Safe ministry check	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.

Table 1: Standards of screening in the Diocese of Bunbury

The policies and procedures of the Diocese of Bunbury:

- 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 mechanism by which ongoing monitoring of the screening that has occurred is possible.

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

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



The Diocese of Bunbury 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.

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 aspects, and created and maintained records in a secure manner.

As set out above, we have concluded that the Diocese of Bunbury has in place policies and procedures that give effect to the standards of screening in the Canon.

The Diocese of Bunbury was requested to provide information in relation to all categories of worker subject to the Canon and appointed after the audit period, as well as more limited information in relation to all other clergy and licensed authorised or paid church workers.

The diocesan audit has involved a quality assurance process as part of assessing the information provided. To do this we:

- requested access to the files of selected clergy and church workers to confirm that the information provided by the diocese was accurate,
- identified any issues in the information provided 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 Bunbury 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 Bunbury.

The audit team was advantaged by attending on site at the Diocesan Office and all queries were responded to by diocesan staff in a comprehensive and timely way.

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

The standards of screening set out in the Canon require that individuals undergo screening 'prior to' appointment. The Diocese of Bunbury 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 (which would be after the licence was issued).

Accordingly, non-compliance for the individual in relation to having a working with children check prior to appointment does not mean there has been non-compliance with the legal obligations set out in the *Working with Children (Criminal Record Checking) Act 2004* (WA).

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

- the findings reflect the levels of compliance with the screening standards in the Diocese of Bunbury during the audit period,
- 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,
- the material compliance assessment is based on the information available at the time of conducting the diocesan audit, and there may be further information available which would change these results; and
- some of the findings relate to categories of worker where there were only a small number of people that fell into that category, and in those circumstances non-compliance in respect of one or two people may have had a disproportionate impact on the total compliance result for that category, and
- the findings reflect the thresholds developed as part of the Audit Framework which, for the most part, require 100 per cent compliance in order for a finding of compliance to be made.

Candidates for ordination

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

It is important to note that the Diocese of Bunbury has a very small number of people who fall into this category.




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

It is recognised that screening of candidates for ordination occurs concurrently with a discernment or formation process overseen by the Ordination Council.

Clergy

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


 The Diocese of Bunbury has been partly compliant in screening clergy in accordance with the Canon in the audit period.

At the date of the audit all screening steps for clergy and licensed, authorised and paid church workers had occurred.

Non-compliance in respect of clergy was largely a result of the availability of national register assessment information for a small number of retired clergy. However, this does not mean that those clergy were not previously subject to that screening step, only that the information was not available at the time of the audit.


Notwithstanding this, we observed high-levels of compliance with the screening steps across all categories of worker.

We have also undertaken an assessment of all other clergy to determine if they have a working with children check clearance (if required) or a police check.


 The Diocese of Bunbury has been compliant in screening current clergy licensed outside the audit period in accordance with the Canon.

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

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

 The Diocese of Bunbury has been compliant in screening licensed, authorised and paid church workers in accordance with the Canon in the audit period.

In addition all other licensed, authorised paid or volunteer church workers undertaking ministry to children were reviewed for whether or not they have a working with children check, with the result being that all other church workers have a working with children check.

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


Volunteer church workers

We have reviewed the information provided by the Diocese of Bunbury relating to volunteer church workers engaged in ministry to children in the audit period. The vast majority of ministry to children in the Diocese of Bunbury is conducted by licenced lay ministers, however there are a small number of volunteers who assist in providing ministry to children.

In the audit period there no volunteer church workers appointed. Those that have been appointed outside the audit period are included in our assessment of all other licensed, authorised paid or volunteer church workers undertaking ministry to children. The result of which was compliance on the part of the Diocese of Bunbury.

Professional standards personnel and safe ministry personnel

We have reviewed information provided by the Diocese of Bunbury relating to people appointed as professional standards personnel or safe ministry personnel in the audit period.

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

Record keeping

The standards of screening require that the Diocese of Bunbury 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 Bunbury in accordance with the quality assurance process set out in the Audit Framework.

The Diocese of Bunbury had a high level of completeness of information provided which the audit team considers is indicative of good recordkeeping practices. Hard copy records were easily accessible, accurate and stored securely.



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

5 Standards of training

Standards of training

The standards of training that require 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 National Training 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 provided by another Church body that the diocesan safe ministry authority has determined 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 were cogent reasons for not doing so),
- any additional standards and guidelines that are inconsistent with the standards of training, and
- procedures in place that 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.

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

The Diocese of Bunbury 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.

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 Bunbury that give effect to the standards in the Canon are as follows:

- the Licencing Statute,
- the Parochial Statute,
- the Selection and Accreditation of Lay Parish Church Workers, and
- the Screening Policy.

The Licencing Statute requires that clergy and licenced church workers comply with safe church requirements of the Diocese of Bunbury prior to being licenced. In the case of licenced lay minister, the Licencing Statute expressly states that a lay person may only be granted a licence if they have attended the relevant training.

The Parochial Statute requires that prior to appointment (or undertaking the work in the case of clergy), people involved in church ministry at a parish level are required to have completed accredited training prior to taking up the position, and training is to be renewed every three years or as required.


The Selection and Accreditation of Lay Parish Church Workers policy requires candidates for all high-risk ministry to complete Diocesan Safe Ministry Training prior to selection.


The Screening Policy requires:

- candidates for ordination must be up to date with their accredited training, and
- listed categories of workers to undertake accredited training, and update this training every three years.

The Screening Policy is not prescriptive about accredited training being completed prior to appointment for church workers, and instead refers to training being made available when applying for a role. We consider that this aspect of the Screening Policy should be read in light of the provisions of the Parochial Statute which require this to be completed prior to appointment for those in parish-based ministry.

Other categories of worker are also required to complete accredited training, including members of Bishop-in-Council and the Diocesan Trustees, as well as other categories of worker who we do not consider fall within the scope of the Canon.

 The Diocese of Bunbury has policies and procedures that give effect to the standards of training.

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



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

Material Compliance Assessment

General

The audit team has requested that the Diocese of Bunbury provide us information in relation to all candidates for ordination, clergy, 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 Bunbury 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 of key importance as it ensures 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.



The Diocese of Bunbury has been compliant in training candidates for ordination in the audit period in accordance with the Canon.



The Diocese of Bunbury has been compliant in training licensed clergy in the audit period in accordance with the Canon.



The Diocese of Bunbury has been compliant in training in screening licensed, authorised and paid church workers engaged in ministry to children in the audit period in accordance with the Canon.

There are very high-levels of completion of training in the Diocese of Bunbury, reflecting the significant investment that the Diocese of Bunbury has made in this area over a number of years.

Record keeping

The standards of training require that the Diocese of Bunbury 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.

The records reviewed by the audit team demonstrated a high degree of accuracy between the records of attendance at training and the date nominated as being the date of training in the individuals record.



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

6 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 Bunbury that give effect to the standards in the Canon are as follows:

- The Parochial Statute,
- Known Sex Offenders and Persons of Concern in a Parish,
- Protocol for Disclosure and Management of Known Sex Offenders in the Parish, and
- Briefing on Worshipping Agreements.

Parochial Statute

The Parochial Statute sets out that a member of the clergy is responsible for, and required to work with the Professional Standards Director in, implementing any Safe Church Worshipping Agreements and other similar strategies as required. This indicates that the Diocese of Bunbury's approach to dealing with Persons of Concern is integrated into its policy infrastructure, rather than existing within a single standalone policy.

Known Sex Offenders and Persons of Concern in a Parish

The policy on 'Known Sex Offenders and Persons of Concern in a Parish' dated 14 November 2019 is one of the Diocese of Bunbury's Safe Church Policies.

It is consistent with most stages in the process prescribed by the Persons of Concern Policy.

Protocol for Disclosure and Management of Known Sex Offenders in the Parish

The 'Protocol for Disclosure and Management for Known Sex Offenders in the Parish' largely replicates the requirements of the 'Known Sex Offenders and Persons of Concern in a Parish' policy, whilst organising them into the responsibilities that different categories of person are bound to uphold.

Briefing on Worshipping Agreements

The 'Briefing on Worshipping Agreements' is a short document which sets out the guidelines to be observed by the Professional Standards Director in respect of Persons of Concern.

It clearly prohibits a Person of Concern from worshipping in the diocese if there is no Worshipping Agreement in place, or if the relevant Worshipping Agreement is breached by the Person of Concern.

The Worshipping Agreement is equivalent to the Safety Agreement set out in the Persons of Concern Policy.

Material Compliance Assessment

General

The audit team has requested that the Diocese of Bunbury provide us de-identified information in relation to all Persons of Concern that have come to the notice of the 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 Bunbury in relation to Persons of Concern. We note that there are agreements in place for all Persons of Concern that came to the attention of the Diocese of Bunbury in the audit period.



The Diocese of Bunbury has been compliant in managing persons of concern in accordance with the standards of safe ministry with persons of concern in the audit period.

Record keeping

In respect of record keeping, both hard and soft copies of safety plans are held by Safe Ministry Services.



The Diocese of Bunbury 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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