

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

February 2026

1 Executive summary

In 2017, the Synod of the Diocese of Newcastle 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 Newcastle.

We wish to extend thanks to the officers of the Diocese of Newcastle for their assistance over the course of the diocesan audit, particularly Cathy Rose, Preena Johnson and Regina Valentine.

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 Newcastle 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 Newcastle has in practice complied with the standards in the Canon in the period from 1 July 2024 to 30 June 2025 (the **audit period**).

The approach by the Diocese of Newcastle 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 Newcastle 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.

The following findings were made:



The Diocese of Newcastle 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 Newcastle against the standards of screening.

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

- address all of the categories of worker covered by the standards of screening,
- assign responsibility to identified persons to monitor compliance with the standards of screening,
- include a mechanism whereby information about the standards of screening is reported centrally,
- include information about recordkeeping practices,
- include a system of ongoing monitoring of the screening that has occurred, and
- set out consequences for non-compliance with the standards.

The Diocese of Newcastle has adopted a risk management system that allows for the management of screening information of volunteers at a parish level. The system has a broader risk function and includes incident reporting.

This risk management system allows for centralised and regular reporting, managed by the audit and risk team of the Diocese of Newcastle. There are other checks in place to ensure there is completeness of information, including an internal audit program.

The rules of the Diocese of Newcastle include a disciplinary framework for non-compliance with the standards, as well as for intervention within, and consequences for, parishes in the event of contraventions of the standards.

The following findings were made:



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



The Diocese of Newcastle does not have any policies and procedures in place that contain additional standards that are inconsistent with the standards of screening.



The Diocese of Newcastle 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 Newcastle has complied with the standards of screening in practice throughout the audit period based on the information provided to us by the Diocese of Newcastle.

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 Newcastle has complied with the *Child Protection (Working with Children) Act 2012* (NSW) as there may be differences between the appointment dates we are assessing and the date someone was first engaged in child-related work within the meaning of that act,
- the findings reflect the levels of compliance with the standards of screening in the Diocese of Newcastle 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, and
- 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.

The following findings were made:



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



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



The Diocese of Newcastle has been non-compliant in screening licensed, authorised or paid church workers engaged in ministry to children engaged in the audit period in accordance with the Canon.



The Diocese of Newcastle has been non-compliant in screening volunteer church workers engaged in ministry to children in the audit period in accordance with the Canon.

It is important to note that all licensed, authorised or paid church workers and all volunteer church workers engaged in ministry to children in the audit period had a valid working with children check prior to commencement, as required by the Canon.



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

The identified non-compliance largely relates to safe ministry assessments occurring after a person was appointed. We note that there is a high-level of completion of these assessments, with most occurring with proximity to the date of appointment.

We have also undertaken an assessment of all other current clergy, and church workers engaged in ministry to children to determine if they have a working with vulnerable people check (if required) or a police check.

The following findings were made:



The Diocese of Newcastle has been compliant in screening all other clergy licensed outside the audit period in accordance with the Canon.



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

Overall, the high level of compliance reflects the resourcing that the Diocese of Newcastle has committed to this area. In particular, we consider that the Diocese of Newcastle has successfully integrated the standards of screening into a comprehensive screening system which is well resourced centrally. The Diocese of Newcastle has focused on ensuring compliance with its statutory obligations and this is reflected in the information we have reviewed.

Standards of training

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

The policies and procedures of the Diocese of Newcastle:

- require that the standards of training are complied with prior to clergy and church workers being appointed (or otherwise) to a ministry position,
- require that clergy or church workers not undertake ministry to children until they have been appropriately screened and 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 Newcastle has policies and procedures in place that give effect to the standards of training.



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



The Diocese of Newcastle 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 Newcastle has complied with the standards of training in practice throughout the audit period based on information provided to us by the Diocese of Newcastle.

The following findings were made:



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



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



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



The Diocese of Newcastle has been compliant in training volunteer church workers engaged in ministry to children in the audit period in accordance with the Canon.

There are high levels of completion of training in the Diocese of Newcastle.

During the audit period, the Diocese of Newcastle had training information stored across two different databases and used a combination of external and internal training packages. Although this did not impact on the outcome of our assessment, we expect that the practical difficulty of multiple databases will resolve in the coming period as more people complete the new training package.

Standards of safe ministry with persons of concern

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

The following findings were made:



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



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



The Diocese of Newcastle 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.

A particular strength of the Diocese of Newcastle's approach to managing persons of concern is the use of formal directions around attendance. This approach allows the Diocese to manage risk while formal safety plans are being developed, as well as banning persons who are unwilling to be subject of risk management.

Also in Part 5, we have assessed whether the Diocese of Newcastle 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 Newcastle.

The following findings were made:



The Diocese of Newcastle 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

We have considered primary source documents provided by the Diocese of Newcastle in accordance with the quality assurance process set out in the Audit Framework.

The Diocese of Newcastle was able to provide information quickly and there was a high level of completeness of information which the audit team considers is indicative of good record keeping practices. The Diocese maintains a central database of information which is regularly updated.



The Diocese of Newcastle 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 Newcastle has adopted policies and procedures that give effect to the standards and guidelines in the Canon.

In terms of its material compliance, a particular strength of the Diocese of Newcastle has been the development of a risk management approach to screening and training.

This approach, and the related systems, has put the Diocese of Newcastle in a strong position to maintain high-levels of completion of the relevant screening and training requirements into the future.

2 Background

The Diocese of Newcastle

Established in 1847, the Diocese of Newcastle is one of the 23 dioceses of the Anglican Church in Australia.

The Diocese of Newcastle is located within the Province of New South Wales.

The Diocese of Newcastle operates parish-based children's and youth ministry, which occurs mid-week and during public worship services on Sunday at many of its 52 parishes.

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 monitor whether people are adequately screened and trained, and to ensure there are strategies in place to manage persons of concern.

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

- a risk statement and framework for managing risk, which incorporates obligations around workplace safety and child safety,
- policies and procedures for responding to complaints of child sexual abuse, or sexual misconduct involving a child,
- redress options for those who have experienced abuse, including via:
 - the National Redress Scheme for Institutional Child Sexual Abuse, and
 - a Diocesan Pastoral Care and Assistance Scheme (PCAAS), which is managed by the Newcastle Anglican Church Redress Corporation, 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 Newcastle is subject to legislative obligations in force in Newcastle, including:

- *Children and Young Persons (Care and Protection) Act 2012* (NSW),
- *Child Protection (Working with Children) Act 2012* (NSW), and
- *Children's Guardian Act 2019* (NSW).

We discuss the interaction between these obligations and the standards in the Canon in further detail in Part 4 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.

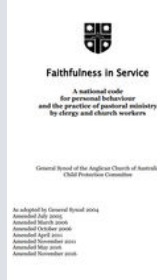
The Canon follows the previous commitments made by the General Synod:

- 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).

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 Newcastle is accountable and transparent about the efforts made by it to improve child safe practices. The audit of adherence by the Diocese of Newcastle to the Canon:

- monitors whether 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 Newcastle (as part of the Anglican Church of Australia) is committed to safe ministry to children.

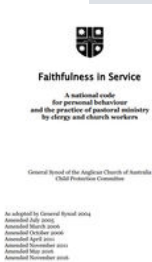
The diocesan audit is consistent with the encouragement of the Royal Commission into Institutional Responses to Child Sexual Abuse for religious organisations to publicly report on the implementation of, and compliance with, standards of safe ministry to children.

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 Newcastle (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 1 above, the diocesan audit involves an assessment as to whether any 'diocesan code of conduct' contains any additional standards or guidelines that are inconsistent with the prescribed 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.

Policy assessment

Faithfulness in Service

In July 2020 and again in 2023, the Synod of the Diocese of Newcastle adopted amended versions of Faithfulness in Service as the diocesan code of conduct, pursuant to clause 9 of the Professional Standards Ordinance 2012.

The diocesan code of conduct includes additional policy content to section 5 of Faithfulness in Service, in the form of references to relevant legislation, and explanatory statements which provide additional guidance in relation to disclosures and reporting obligations, including in respect of reportable conduct. This additional material does not create inconsistencies with the prescribed code of conduct.

The approach of the Diocese recognises that the material in the prescribed code of conduct includes significant policy guidance, and that there may be a need to alert readers of the code of conduct to their legislative obligations and the support available from the Diocese.

Adding additional information around disclosures and reporting obligations ensure that the document is comprehensive. Further, the diocesan code of conduct is an instrument that all volunteers appointed to positions in the Diocese receive training on.

The relevant parts of the version of Faithfulness in Service currently in force in the Diocese of Newcastle are consistent with the prescribed code of conduct.



The version of Faithfulness in Service in force in the Diocese of Newcastle does not 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 (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, 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 Newcastle 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 and are not yet required to be subject to a national register assessment.

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.

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

- the Clerical Ministry Ordinance 2009 (the **CMO Ordinance**),
- the Administration of Parishes Ordinance 2010 (the **Parishes Ordinance**),
- the Parish Safety Policy (the **Parish Safety Policy**),
- the Volunteers – Ministry Areas Policy (the **Volunteers Policy**), and
- the Volunteer and Other Church Workers Procedure (the **Volunteers Procedure**).

We also refer to some other documents below which are subordinate forms to the policies and procedures, including the safe ministry check documents, and volunteer agreements.

CMO Ordinance

The CMO Ordinance sets out the terms on which the Bishop of the Diocese of Newcastle appoints and issues licences to clergy.

This includes a requirement that to be issued a licence, a member of clergy must demonstrate that “he or she is suitable for ministering with children and vulnerable people by satisfactorily completing all screening requirements”.

The screening requirements are set out in correspondence around the issuance of a licence, with clergy required to complete a working with children check, a national police check, a safe ministry assessment, a church ministry assessment (if required), and a national register assessment.

We have reviewed the safe ministry check documents in use in the Diocese of Newcastle and confirm that they accord with those promulgated by the General Synod.

Parishes Ordinance

The Parishes Ordinance requires that the parish consider matters relating to child safety at each parish council meeting, and to appoint an officer who assists the incumbent and wardens.

The Parish Ordinance also:

- provides for an annual assessment of the compliance of the parish with the Parish Safety Policy and Volunteers Policy, and
- provides for consequences where a parish is not compliant and cannot demonstrate that it is working towards compliance.

Parish Safety Policy

The Parish Safety Policy sets out the commitment of the Diocese of Newcastle to the recruitment, screening and training of volunteers.

The Policy gives effect to the standards of screening in the Canon by:

- setting out the responsibility of incumbents and wardens to ensure that screening occurs, and
- allowing for periodic audits of parish safe ministry practices.

Volunteers Policy

The Volunteers Policy acknowledges the important role that volunteers play in the ministry of the Diocese of Newcastle.

The Policy gives effect to the standards of screening in the Canon by:

- prohibiting volunteers from engaging in ministry to children until they have completed the screening steps (which accord with the standards of screening in the Canon),
- assigning responsibility at different levels in the Diocese for ensuring that there is oversight of the systems, policies and procedures that relate to screening volunteers,
- sets out a process for onboarding volunteers that includes:
 - an assessment for the relevant volunteer role,
 - a volunteer engagement form,
 - a duty statement relevant to the volunteer role,
 - the completion of the necessary screening steps, including referee checks,
 - the completion of training and induction,
 - the completion of a volunteer agreement,
 - the entry of the relevant information on the risk management system,
 - regular reviews of the system and records.
- providing that any fitness issues are escalated to the Director of Professional Standards.

Volunteers Procedure

The Volunteers Procedure gives effect to the Volunteers Policy by setting out a process by which the incumbent and wardens of a parish are to assess each volunteer role to determine the type of screening the volunteer is required to complete.

The Volunteer Procedure includes common examples of roles that involve ministry to children, with associated duty statements. The procedure recognises that the ministry and context of each parish will be different, and so sets out a process for assessing volunteer roles that do not fall within common examples.

For volunteers engaged in ministry to children, the Volunteer Procedure gives effect to the standards of screening in the Canon, and requires volunteers complete a working with children check, national police check, safe ministry assessment, church ministry assessment (if required) and a national register assessment.

The Volunteers Procedure addresses:

- the role of people in parishes to ensure that screening occurs,
- the approach to adopt for volunteers who are engaged in multiple roles, or at multiple parishes,
- the supervision of volunteers,
- a process for the regular review of the register of volunteers, and
- record keeping guidelines.

As stated above, there are additional internal documents, including a background check compliance matrix procedure that also reflect the standards of screening in the Canon.

In relation to each category of worker, the policy position of the Diocese is as follows:

	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 Newcastle

When taken together, the policies and procedures in place in the Diocese of Newcastle:

- address all of the categories of worker covered by the standards of screening,
- assign responsibility to identified persons to monitor compliance with the standards of screening,
- include a mechanism whereby information about the standards of screening is reported centrally,
- include information about recordkeeping practices,
- include a system of ongoing monitoring of the screening that has occurred, and
- set out consequences for non-compliance with the standards.

The Diocese of Newcastle has adopted a risk management system that allows for the management of screening information of volunteers at a parish level. The system has a broader risk function and includes incident reporting.

This risk management system allows for centralised and regular reporting (including to the Diocesan Council), managed by the audit and risk team of the Diocese of Newcastle. There are other checks in place to ensure there is completeness of information, including an internal audit program.

The following findings were made:

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

✓ The Diocese of Newcastle does not have any policies and procedures in place that contain additional standards that are inconsistent with the standards of screening.

✓ The Diocese of Newcastle 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.

Assessment

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

The Diocese of Newcastle 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 is accurate,
- observed personnel of the Diocese of Newcastle navigating the relevant database in response to our enquiries,
- identified any inaccuracies in the information provided and confirmed this with personnel of the Diocese of Newcastle, 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 Newcastle 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 Newcastle.

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

We have been able to confirm the date clergy and paid church workers were licensed, engaged or appointed in the audit period.

For volunteer church workers engaged in ministry to children, we were provided the date that each volunteer worker signed a volunteer agreement, which is a necessary pre-condition of them commencing in a volunteer role.

For church workers engaged in ministry to children, we have undertaken an assessment of the practice of the Diocese of Newcastle in the audit period. This included observing the systems in place, including the communication that occurs with volunteers, and with parishes. However, it is important to note that this is a limitation in the audit results.

As part of our assessment, we have identified that the Diocese of Newcastle should record the date that safe ministry assessments have occurred and who has conducted the safe ministry assessment in the relevant database. This information was otherwise able to be confirmed through an assessment of the practice of the Diocese of Newcastle in the audit period.

The audit team was advantaged by attending on site at the Diocesan Office and all queries were responded to by personnel of the Diocese of Newcastle 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 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 legal obligations.

The standards of screening set out in the Canon require that individuals undergo screening 'prior to' appointment. The date of appointment will not always align with the date they formally commence in a role, which may be after the date of appointment.

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

- the findings reflect the levels of compliance with the standards of screening in the Diocese of Newcastle 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
- the findings relating to volunteer church workers have involved some sampling and accordingly may not reflect the levels of compliance across all parishes in the Diocese of Newcastle.

Candidates for ordination

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



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

Clergy

We have reviewed the information provided by the Diocese of Newcastle relating to the clergy who were issued a licence in the audit period.



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

We note that the Diocese of Newcastle does not set 3- or 5-year terms for each licence, and so there were limited licence renewals in the audit period. Instead, the licensing events were largely licences issued to new clergy and the issuance of PTOs.

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



The Diocese of Newcastle has been compliant in screening all other 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 Newcastle relating to people appointed as a licensed, authorised or paid church worker engaged in ministry to children in the audit period.



The Diocese of Newcastle has been non-compliant in screening licensed, authorised or paid church workers engaged in ministry to children engaged in the audit period in accordance with the Canon.

We note that during the audit period all licensed, authorised or paid church workers engaged in ministry to children had a valid working with children check prior to the date of commencement.

We note that at the date of this report all screening steps have been completed for all workers in this category.

Volunteer church workers

We have reviewed the information provided by the Diocese of Newcastle relating to volunteer church workers engaged in ministry to children in the audit period.



The Diocese of Newcastle has been non-compliant in screening volunteer church workers engaged in ministry to children in the audit period in accordance with the Canon.

We note that during the audit period all volunteers engaged in ministry to children had a valid working with children check prior to the date of commencement (being the date they signed their volunteer agreement).

We note that at the date of this report all screening steps have been completed for all workers in this category.

Church workers in the period

We have also undertaken an assessment of all other people appointed as a licensed, authorised, paid or volunteer church worker engaged in ministry to children to determine if they have a working with vulnerable people check (if required) or a police check.



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

Safe ministry personnel and professional standards personnel

We have reviewed the information provided by the Diocese of Newcastle relating to safe ministry personnel or professional standards personnel were appointed in the audit period



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

Record keeping

The standards of screening require that the Diocese of Newcastle 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.



The Diocese of Newcastle has been compliant in keeping records with respect to the standards of screening in the Canon.

We have considered primary source documents provided by the Diocese of Newcastle in accordance with the quality assurance process set out in the Audit Framework. The Diocese of Newcastle had a high level of completeness of information provided which the audit team considers is indicative of good record keeping practices.

5 Standards of training

Standards of training

The standards of training require clergy and church workers who engage in ministry to children to 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 or organisation 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).

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 Newcastle has authorised the use of the following training:

- training modules provided by the NSW Office of the Children's Guardian, and
- an internal module on Faithfulness in Service.

Accordingly, on the basis that these training programs are accredited by the diocesan safe ministry authority, we conclude the training constitutes 'accredited training' within the meaning of the Canon. We have considered their content and observe that they largely address the Safe Ministry Training National Benchmarks.

We note the importance of providing a specific module on Faithfulness in Service so that workers subject of the standards of training understand the specific behavioural expectations in the Diocese of Newcastle.

The policies and procedures of the Diocese of Newcastle that give effect to the standards of training are as follows:

- the Parish Safety Policy,
- the Volunteers Policy, and
- the Volunteers Procedure.

At the outset, safe ministry training requirements for candidates for ordination, licensed clergy and licensed, authorised or paid church workers engaged in ministry to children is contained in correspondence issued to them in the context of their engagement.

Parish Safety Policy

In terms of safe ministry training in a parish context, the Parish Safety Policy sets out that training requirements will be communicated through the e-learning platform and that exemptions are available for those that have completed similar training or who are at risk of being adversely impacted by the content of training. We consider that there are cogent reasons for these exemptions.

Volunteers Policy

The policy position for clergy is repeated in the Volunteers Policy (the full name being the 'Volunteer and Other Church Workers Policy'). For clergy to be licensed they are to undertake all 11 modules of the NSW Office of Children's Guardians Child Safe e-learning called 'Keeping children safe in organisations (for all sectors)', as well as other training prescribed by the Diocese.

The Volunteers Policy requires that all volunteers over the age of 18 have current safe ministry training prior to commencing their role, and they are required to refresh their training at intervals of no more than three years.

The subordinate forms to the Volunteers Policy include relevant checks by the relevant diocesan officers of the date of completion of safe ministry training.

When taken together, the policies and procedures in place in the Diocese of Newcastle:

- address all of the categories of worker covered by the standards of training,
- assign responsibility to identified persons to monitor compliance with the standards of training,
- include a mechanism whereby information about compliance with the standards of training is reported centrally,
- include information about recordkeeping practices,
- include a system of ongoing monitoring of the training that has occurred, and
- set out consequences for non-compliance with the standards.



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



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



The Diocese of Newcastle 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.

Material Compliance Assessment

General

The audit team has requested that the Diocese of Newcastle provide us training information in relation to all candidates for ordination, clergy, licensed, authorised or paid church workers and volunteer church workers appointed (or otherwise) in the audit period.

Assessment

During the audit period, the Diocese of Newcastle was transitioning training providers and so the records we have assessed were held across more than one database. Although this did not impact on the outcome of our assessment, we expect that the practical difficulty of multiple databases will resolve in the coming period as more people complete the new training package.

Based on the information provided by the Diocese of Newcastle, we assessed whether each category of worker undertook accredited training **prior to** appointment as follows.



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



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



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



The Diocese of Newcastle has been compliant in training volunteer church workers engaged in ministry to children in the audit period in accordance with the Canon.

Record keeping

The standards of training require that the Diocese of Newcastle 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 soft copy 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 Newcastle 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 that give effect to the standards of safe ministry with persons of concern include:

- the Parishes Ordinance, and
- the Safe Ministry to Persons of Concern Policy.

Parishes Ordinance

The Parishes Ordinance has a process for issuing prohibition orders where a person of concern is identified, and while an initial risk assessment occurs.

Where a person of concern is unprepared to engage in a Safety Plan, or the result of the risk assessment is that the risk cannot be adequately managed, then a prohibition order may be issued.

Safe Ministry to Persons of Concern in a Parish

The Diocese of Newcastle has adopted the General Synod policy for 'Safe Ministry in a parish where there is a risk of sexual abuse by a Person of Concern.'

The Safe Ministry to Persons of Concern Policy gives effect to the standards in the Canon.

We have also had the benefit of reviewing internal procedures, audit documents and templates prepared by the Professional Standards Director, Cathy Rose. All of these together describe a rigorous and comprehensive approach to managing persons of concern.



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



The Diocese of Newcastle 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 Newcastle provide us de-identified information in relation to 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 Newcastle in relation to persons of concern and discussed the approach with the Director of Professional Standards. We note that there are agreements in place for all persons of concern that came to the attention of the Diocese of Newcastle in the audit period. The Diocese has otherwise managed persons of concern by issuing various prohibition orders pursuant to the Parishes Ordinance . The outcome of these orders are that the persons of concern are not attending the activities of the Diocese.



The Diocese of Newcastle 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 the Director of Professional Standards.

The Diocese of Newcastle 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.