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12 October 2026

Matthew Robson
National Register Officer
General Synod of the Anglican Church of Australia
Suite 5.02 Level 5,
323 Castlereagh Street,
Haymarket NSW 2000

Dear Matthew,

Agreed-Upon Procedures in relation to the review of the National Register Canon 2007 and its related protocols ("The Canon")

We have been engaged by the Standing Committee of General Synod of the Anglican Church of Australia ("the Standing Committee") with the objective of this engagement being to provide findings of the processes and procedures in relation to the administration of the National Register ("the Register") and their in compliance with the Canon.

We have performed procedures agreed with you to report factual findings for the purpose of assisting you in assessing, in combination with other information obtained by you, that the policies and procedures are in compliance with the Canon for the period 1 January 2025 to 31 December 2025. Our procedures have been carried out based on the requirements of the identified separate clauses within the Canon. The procedures performed are detailed in the terms of the engagement of 13 May 2026 and described below and in the attached appendix.

Management's Responsibility for the Procedures Agreed

Management are responsible for the adequacy or otherwise of the procedures agreed to be performed by us. You are responsible for determining whether the factual findings provided by us, in combination with any other information obtained, provide a reasonable basis for any conclusions which you or other intended users wish to draw on the subject matter.

Assurance Practitioner's Responsibility

Our responsibility is to report factual findings obtained from conducting the procedures agreed. We conducted the engagement in accordance with Standard on Related Services ASRS 4400 *Agreed-Upon Procedures Engagements to Report Factual Findings*. We have complied with ethical requirements equivalent to those applicable to Other Assurance Engagements, including independence.

Because the agreed-upon procedures do not constitute either a reasonable or limited assurance engagement in accordance with AUASB standards, we do not express any conclusion and provide no assurance on the compliance with the Canon. Had we performed additional procedures or had we performed an audit or a review of the policies and procedures to ensure compliance with the Canon in accordance with AUASB standards, other matters might have come to our attention that would have been reported to you.

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Restrictions on Use of Report

This report is intended solely for the use of The Standing Committee for the purpose set out above. As the intended user of our report, it is for you and other intended users to assess both the procedures and our factual findings to determine whether they provide, in combination with any other information you have obtained, a reasonable basis for any conclusions which you wish to draw on the subject matter. As required by ASRS 4400, use of this report is restricted to those parties that have agreed the procedures to be performed with us and other intended users identified in the terms of the engagement. Accordingly, we expressly disclaim and do not accept any responsibility or liability to any party other than the Standing Committee for any consequences of reliance on this report for any purpose.

Our Findings

Within the constraints of the canon, the register is operating materially as intended. We are pleased to present our findings to you below. We would like to take the opportunity to thank you and your staff for the assistance during this process.

Please do not hesitate to contact me if you have any queries in relation to any of the above.

Yours sincerely



Joseph Santangelo
Director

Requirements of the National Register Canon 2007	Factual findings
Clause 4 of the National Register Canon 2007 There shall be a National Professional Standards Register of clergy and lay persons established and maintained in accordance with the provisions of this Canon. **Work performed to address the above Clause** We reviewed the National Professional Standards Register to ensure that it is regularly maintained. We reviewed the access log to ensure that the Register is only accessible by authorised persons.	**Factual findings** Through enquiry and observation, we documented the design of the National Professional Standards Register ("the Register") system. We sighted the existence of a National Register. The current full register exists on a secure web portal that has access restricted to persons who are authorised to do so. Each user has a unique username and password before entering a different entry code each time they log on, received via The Microsoft Authenticator Application. New information can be uploaded to the Register via the web portal, and this ability is restricted to the Directors of Professional Standards ("DPS"). There are 15 DPS accounts, including one with two accounts (14 individuals) (2024: 15). Two Associate DPSs also have DPS-role access. When new information is uploaded to the portal, the DPS's are able to hold the information on a sub-level before uploading to the register. This sub-level database is only accessible to other DPS's in other Diocese around Australia. When the DPS is ready to upload an event, the item is uploaded directly on to the register. This report only relates to the Register, not the DPS sub-ledger. Only DPS-level users can add events or persons to the register. Subsequent to this, the system automatically sends a message to the National Register Officer ("NRO") who will then send a notification to the member of the clergy or lay person concerned. Information regarding persons on the register can be accessed via the following methods: • Each of the 14 DPS's (2024: 15), 2 associate DPS's, 43 additional authorised users (2024: 36) have access to the Register portal (total 59, 2024: 51). • Authorised Users can access information through the submission of an 'Application for authorised Diocesan persons to access the National Register Report Request System'. This is located on the Anglican Church website at: https://www.anglican.org.au/national-register

Requirements of the National Register Canon 2007	Factual findings
	▪ It is the responsibility of the Diocese to confirm that the identity of each applicant has been verified before their access is approved. The General Secretary is required to approve any application to become an Authorised User. ▪ Any member of the clergy or layperson can request details regarding own information on the register by completing an 'Application to Obtain Information about Yourself in the National Register' form also available at the above website. ▪ Persons who have information on the Register can apply to make amendments or remove information by completing the 'Application for Amendment of Information in the National Register' which is also on the website. We note that during the 2025 year, there were 9 new and 1 removal / resignation of authorised users. All new users had been approved by the General Secretary. The forms listed above for 'Application for authorised Diocesan persons to access the National Register Report Request System', 'Application to Obtain Information about Yourself in the National Register' and 'Application for Amendment of Information in the National Register', have not been updated to include the new address of the National Register, and were last updated in September 2014. The General Secretary confirmed that at all material times a mail redirection was in place, resulting in all forms being forwarded to the Castlereagh Street address. The forms were amended in July 2026. **Limitation in assessing compliance with relevant clause** None
Clause 5 (1) of the National Register Canon 2007 The National Register shall be a register of all clergy:	**Factual findings** Testing was performed with the NRO in connection to the composition of information on the register, and examined documentation to determine if the information on the register

Requirements of the National Register Canon 2007	Factual findings
a) against whom a notifiable complaint or a notifiable charge has been made unless it is exhausted; or b) in respect of whom there has been a relinquishment of, or consent to deposition from, Holy Orders arising out of sexual misconduct or child abuse; or c) who have made an adverse admission or are the subject of an adverse finding; or d) in respect of whom there has been an adverse check or an adverse criminal history check or an adverse Safe Ministry Check; or e) who have not been ordained as a priest or as a Bishop, or issued with a licence or appointed by a Church authority, because of an adverse risk assessment.	has been recorded in accordance with Clause 5(1). Additionally, confirmation letters were sent to all the DPS's representing the 23 Diocese requesting positive confirmation that they have made the General Secretary (GS) aware of all notifiable events. The Register exists to record clergy who fall under the definitions provided by Clause 5(1) under the National Register Canon 2007. Of the 23 Diocese, we received 22 responses to the confirmations that were sent (2024: 21 responses received). 19 of these confirmed they were in compliance, and 3 confirmed they were either fully or partial not in compliance (2024: 20 were in compliance and 1 was in non-compliance). There was no response from 1 of the Diocese (2024: 2 no responses).
Work performed to address the above Clause We enquired with the National Register Officer ("NRO") the composition of information on the register. We reviewed appropriate documentation to determine if the information on the Register has been held in accordance with Clause 5(1). We sent confirmation letters to all the DPS's representing the 23 Diocese requesting positive confirmation that they have made the General Secretary (GS) aware of all notifiable events.	**Limitation in assessing compliance with relevant clause** There is an inherent limitation of scope in testing the completeness of the Register in relation to 'all clergy'. This is due to limitations of evidence to support our conclusion that **all** DPS's update the Register for **all** reportable complaints and notifications that they are aware of, as we are unable to track all complaints and notifications made to the DPS.

Requirements of the National Register Canon 2007	Factual findings
Clause 5 (2) of the National Register Canon 2007 The register of clergy shall contain the following matters: a) Information relating to clergy; and b) in relation to each member of the clergy included in the register, a notation of the date on which the register was last altered. **Work performed to address the above Clause** We enquired with the National Register Officer ("NRO") the composition of information on the register. In the presence of the NRO, we observed extracts of the National Register to confirm the type of information contained therein. We sent confirmation letters to all the DPS's representing the 23 Diocese requesting positive confirmation that they complied with the above requirements.	**Factual findings** Testing of the Register was performed to identify the details kept of each individual. The system allows the user to drill down into the individual name and review all information uploaded by the DPS on the screen. The register contains information relating to clergy, including: ▪ given names, ▪ date of birth, ▪ postal address, ▪ notifiable complaints or charges that have been placed against them, ▪ which authorised user has requested information on persons on the register. Of the 23 Diocese, we received 22 responses to the confirmations that were sent (2024: 21 responses received). 19 of these confirmed they were in compliance, and 3 confirmed they were either fully or partial not in compliance (2024: 20 were in compliance and 1 was in non-compliance). There was no response from 1 of the Diocese (2024: 2 no responses). We found that the Register retained details of when information relating to the clergy was last updated/altered, however, as in the previous year it was noted that several individuals on the register did not have known dates of birth or postal addresses hence this information was blank. **Limitation in assessing compliance with relevant clause** There is an inherent limitation of scope in testing the completeness of the Register in relation to 'all clergy'. This is due to limitations of evidence to support our conclusion that **all** DPS's update the Register for **all** reportable complaints and notifications that they are aware of, as we are unable to track all complaints and notifications made to the DPS.

Requirements of the National Register Canon 2007	Factual findings
Clause 6 (1) of the National Register Canon 2007 Subject to this Canon the National Register shall be a register of all lay persons: a) against whom a notifiable complaint or a notifiable charge has been made unless it is exhausted; or b) who have made an adverse admission or are the subject of an adverse finding; or c) in respect of whom there has been an adverse check or an adverse criminal history check or an adverse Safe Ministry Check; or d) who have not been ordained as a deacon, or issued with a licence or appointed by a Church authority, because of an adverse risk assessment. **Work performed to address the above Clause** We enquired with the NRO the composition of information on the register. We reviewed appropriate documentation to determine if the information on the Register has been held in accordance with Clause 6 (1). We sent confirmation letters to all the DPS's representing the 23 Diocese requesting positive confirmation that they have made the General Secretary (GS) aware of all notifiable events.	**Factual findings** Testing was performed with the assistance of the NRO on the composition of information on the Register, and examined documentation to determine if the information on the Register has been recorded in accordance with Clause 6(1). The Register exists to record lay persons who fall under the definitions provided by Clause 6(1) under the National Register Canon 2007. Of the 23 Diocese, we received 22 responses to the confirmations that were sent (2024: 21 responses received). 19 of these confirmed they were in compliance, and 3 confirmed they were either fully or partial not in compliance (2024: 20 were in compliance and 1 was in non-compliance). There was no response from 1 of the Diocese (2024: 2 no responses). **Limitation in assessing compliance with relevant clause** There is an inherent limitation of scope in testing the completeness of the Register in relation to 'all lay persons'. This is due to limitations of evidence that all DPS's have updated the Register for **all** reportable complaints and notifications that they are aware of, as we are unable to track all complaints and notifications made to the DPS.

Requirements of the National Register Canon 2007	Factual findings
Clause 6 (2) of the National Register Canon 2007 The register of lay persons shall contain the following matters: a) Information relating to lay persons; and b) in relation to each lay person included in the register, a notation of the date on which the register was last altered. **Work performed to address the above Clause** We enquired with the NRO the composition of information on the register. In the presence of the NRO, we observed extracts of the National Register to confirm the type of information contained therein. We sent confirmation letters to all the DPS's representing the 23 Diocese requesting positive confirmation that they complied with the above requirements.	**Factual findings** The register contains information relating to lay persons, including: ▪ given names, ▪ date of birth, ▪ postal address, ▪ notifiable complaints or charges that have been placed against them if applicable, and ▪ which authorised user and DPS has requested information about each person on the register. Of the 23 Diocese, we received 22 responses to the confirmations that were sent (2024: 21 responses received). 19 of these confirmed they were in compliance, and 3 confirmed they were either fully or partial not in compliance (2024: 20 were in compliance and 1 was in non-compliance). There was no response from 1 of the Diocese (2024: 2 no responses). We found that the Register retained details of when information relating to the lay-persons was last updated/altered, however, as in the previous year it was noted that several individuals on the Register did not have known dates of birth or postal addresses. **Limitation in assessing compliance with relevant clause** There is an inherent limitation of scope in testing the completeness of the Register in relation to 'all lay persons'. This is due to limitations of evidence that all DPS's have updated the Register for **all** reportable complaints and notifications that they are aware of, as we are unable to track all complaints and notifications made to the DPS.

Requirements of the National Register Canon 2007	Factual findings
Clause 7 (1) of the National Register Canon 2007 Subject to this Canon, the National Register shall be maintained by the General Secretary in such form as the Standing Committee shall approve so as to ensure the security of the Information therein. **Work performed to address the above Clause** Through enquiry and observation with the NRO, we documented the security systems of the National Register. As part of the process, we also received updated information from the IT support team. We also documented the key IT upgrades that were made during the year.	**Factual findings** On enquiry and observation, we found that the Register has been developed into a system that is able to record information about clergy and lay persons in accordance with the scope provided by the Canon. We found that the system has the following security measures to protect the information therein: *Storage of information* – Data is stored within the Web Portal. Access to this is restricted only to those with authority granted by the NRO. To access the online database, the users must enter a secure online portal, using an individuals username, passwords and pass codes that change with each entry (received via a text message). *Security of data* – The online portal used in the Register system is hosted by an enterprise level hardware Dell Sonicwall NSA 2700, which is protected by Firewalls and is further secured through layers of privileges and authentication for users. We note that the firmware for the firewall was updated on 5/12/2024 as communicated by Infocom. Infocom was acquired by FriendlyWare during the year, but the arrangement for IT services has continued. *Upload of Information* – Information is only able to be uploaded onto the server by a DPS-level user through the access within the online portal. No other users are able to upload information onto the database. When a DPS makes an application to or a modification of the Register onto the server, an automatically generated internal message is sent to the NRO. This is to ensure the NRO is aware of all new information uploaded. *Access of Information* – Access of information can be requested by each of the active DPS's, Associate DPS's, and the 43 additional 'Authorised Users' (e.g. non DPS-role access). Each authorised user must fill out and have approved (by the NRO) an 'Application for Authorisation' which is available on https://www.anglican.org.au/national-register to obtain access to information in the database. Once the form is appropriately filled, the General Secretary will confirm the validity of the individual by counter signing the form. Once fully signed and approved

Requirements of the National Register Canon 2007	Factual findings
	by the General Secretary and set up by the NRO, the new user is sent a guide pack on how to access the online portal. In addition, any member of the clergy or laity can access own information held on the Register by completing an "Application for own information" also available on the website, however information will only be made known to those whose identities are confirmed by a Justice of the Peace or equivalent and verified by the NRO. These forms have not been updated to include the new address of the National Register, and were last updated in September 2014. **Limitation in assessing compliance with relevant clause** We note that whilst we obtained an understanding and documented the security systems, we have not tested the effectiveness and sufficiency thereof.
Clause 7 (2) of the National Register Canon 2007 The General Secretary shall issue forms necessary for the operation of the National Register and publish these forms on the website of the General Synod. **Work performed to address the above Clause** We reviewed the National Registry website and enquired with the NRO to ensure that the necessary documents have been provided to ensure that authorised users and clergy/lay persons have access to the above information as per Clause 7.	**Factual findings** Reviewed the https://www.anglican.org.au/national-register website and documented the forms available relating to the Register. We found that the following approved forms allowed users to access the following information on the Register: ▪ Application for Authorised Diocesan Persons to Access the National Register Report Request System ▪ Application to Obtain Information About Yourself in the National Register ▪ Application for Amendment of Information in the National Register. These forms had not been updated to include the new address of the National Register, and were last updated in September 2014 at time of testing. General Secretary confirmed that at all material times a mail redirection was in place, resulting in all forms being forwarded to the Castlereagh Street address.

Requirements of the National Register Canon 2007	Factual findings
	The forms were amended in July 2026. **Limitation in assessing compliance with relevant clause** None
Clauses 8 (1), (2) and (4) of the National Register Canon 2007 A DPS shall enter 'Information' in the National Register relating to any member of the clergy or lay person to which he or she has access in carrying out his or her responsibilities, in accordance with a protocol approved by the General Synod, or the Standing Committee, and as soon as practicable and, no later than one month after he or she has access to the Information. DPS shall advise General Secretary if information of which he or she is aware, has not been entered in accordance with subsection (1) as soon as practicable after the expiration of the period specified in subsection (1). DPS who has given advice to General Secretary per Clause 8 (2) will as soon as practicable notify General Secretary of this information. **Work performed to address the above Clauses** We sent confirmation letters to all the DPS's representing the 23 Diocese requesting positive confirmation that they complied with the above requirements.	**Factual findings** Of the 23 Diocese, we received 22 responses to the confirmations that were sent (2024: 21 responses received). 19 of these confirmed they were in compliance, and 3 confirmed they were either fully or partial not in compliance (2024: 20 were in compliance and 1 was in non-compliance). There was no response from 1 of the Diocese (2024: 2 no responses). Without access to other information of the DPS that may evidence receipt of information, we were unable to confirm that the notifications were sent "as soon as practicable, and no later than one month" after the DPS had access to the information. There were no instances noted per Clause 8 (1) however information uploaded from each DPS is automatically entered onto the online portal. Therefore as soon as a DPS uploads a new addition or event, the register is updated immediately. The NRO receives a message on the system which informs him of the details of the person or event update and is able to send out a notification. We were able to ensure that for all new additions and updates within the new system, all entries were automatically entered on the National Register by the DPS. Without access to other information of the DPS that may evidence receipt of information, we were unable to confirm that the notifications were sent "as soon as practicable, and no later than one month" after the DPS had access to the information.

Requirements of the National Register Canon 2007	Factual findings
	Limitation in assessing compliance with relevant clause Due to the limitations in access to evidence from authorised persons and each church authority, we were unable to confirm if the notifications from the DPS had been sent "as soon as practicable and no later than one month" after they had access to the information.
Clause 8 (3) of the National Register Canon 2007 The General Secretary shall: a) after receipt of advice, promptly enter a caution in the National Register in relation to the member of the clergy or lay person, the subject of that Information; and b) no later than one month after the entry of that caution in the National Register, notify the member of the clergy or lay person concerned, by letter sent to his or her last known postal or electronic address, of: i. the entry of the caution; and ii. the right of that person to request in writing of the General Secretary the removal of the caution in accordance with subsection (5). **Work performed to address the above Clause** We obtained an understanding of the definition of a 'caution'. We enquired of the NRO as to whether there were any cautions and incidents. We reviewed the register to identify any cautions and incidents.	**Factual findings** A 'caution' is a notice of information not yet confirmed as a notifiable complaint within the specified timeframe. The NRO confirmed that they had not been made aware of any cautions required to be recorded during the 2025 year (2024: nil). **Limitation in assessing compliance with relevant clause** Due to the limitations to access of information, we were unable to confirm that there were no such instances.

Requirements of the National Register Canon 2007	Factual findings
Clause 8 (5) of the National Register Canon 2007 The General Secretary shall promptly after the earlier of: a) notification by a DPS under subsection (4); and b) the expiration of two months from receipt of a request in writing from the member of the clergy or lay person the subject of the caution requesting its removal, remove the caution from the National Register. **Work performed to address the above Clause** We enquired of the NRO as to whether there were any cautions and incidents. We reviewed the register to identify any cautions and incidents.	**Factual findings** The NRO confirmed that they had not been made aware of any cautions required to be recorded during the 2025 year (2024: nil). **Limitation in assessing compliance with relevant clause** Due to the limitations to access of information, we were unable to confirm that there were no such instances.

Requirements of the National Register Canon 2007	Factual findings
Clause 9 (5) of the National Register Canon 2007 Where the General Secretary receives a police request, or a police request record from a DPS, the General Secretary shall not notify the member of the clergy or lay person of the entry of Information in the National Register relating to that person until the sooner of: ▪ the expiration of six months after the receipt of the police request; or ▪ the receipt of a withdrawal of the police request; and ▪ a withdrawal of the police request record from a Director of Professional Standards, as the case may be. **Work performed to address the above Clause** We discussed with the NRO regarding the compliance with Clause 9(5). We enquired about the status of police requests made during the year and open cases at year end. We reviewed the statistics detailing the persons and events added to the year to identify all police requests. For active cases, we traced the cases of police requests to the additions made to the Register. We ensured that where a case is still under police request, there has been no notification sent to the member.	**Factual findings** From inquiries with the NRO and review of the persons and events added to the National Register in 2025, there was 1 new police request made during the year (2024: 2). 11 police requests were open as at 31 December 2025, including 2 from 2024, and the earliest requests dating back to 2020 (1). **Limitation in assessing compliance with relevant clause** None.

Requirements of the National Register Canon 2007	Factual findings
Clauses 10 (1) and (2) of the National Register Canon 2007 A DPS shall notify the General Secretary as soon as practicable after becoming aware that a notifiable complaint or a notifiable charge against a member of clergy or a lay person has been exhausted. Where notification is received from the applicable DPS that a notifiable complaint or notifiable charge against a member of the clergy or a lay person has been exhausted, the General Secretary shall, as soon as practicable and no later than one month after receipt of the notification, remove Information in the National Register relating to that notifiable complaint or notifiable charge and notify: • the member of the clergy or lay person concerned of the removal of that Information by written notification sent to his or her last known postal or electronic address; and • each authorised person who has had access to that Information, other than the person, of the removal of that Information, by written notification. **Work performed to address the above Clauses** Where persons were removed, we reviewed the case to confirm the DPS notified the General Secretary that the case has been exhausted. Where persons and / or events were removed; • We verified that a letter was sent out to member of clergy/lay person within one month of notification being received from the applicable DPS that a notifiable complaint or notifiable charge against a member of the clergy or a lay person has been exhausted;	**Factual findings** There were 0 instances where information had been accessed where the claim had been exhausted for 2025 (2024: 1). There were no instances where the letter was not sent because the address was unknown or as instructed by police, contact with the individual was prohibited. **Limitation in assessing compliance with relevant clause** Via the online portal, the General Secretary is notified as soon as the DPS uploads the information to the portal. The General Secretary and we were unable to confirm this information was entered onto the Register as soon as practicable after the DPS became aware of the information.

Requirements of the National Register Canon 2007	Factual findings
• We inspected the computer and generated report, we confirmed that the person or event was removed from register; • Confirmed that the reason for removal was noted on the Register.	
Clause 10 (3) of the National Register Canon 2007 Each authorised person shall, as soon as practicable and no later than one month after the receipt of the notification referred to in that subsection, shall forward a copy of that notification to each Church authority to whom the authorised person has disclosed the Information. **Work performed to address the above Clause** Where a notifiable complaint was exhausted, we verified whether there had been access to this information. We verified that these persons had been informed with the appropriate information.	**Factual findings** There were 0 instances where information had been accessed where the claim had been exhausted for 2025 (2024: 1). There were no instances where the letter was not sent because the address was unknown or as instructed by police, contact with the individual was prohibited. **Limitation in assessing compliance with relevant clause** None.
Clause 10 (4) of the National Register Canon Where notification is received from the applicable DPS that a member of the clergy or a lay person relating to whom there is Information in the National Register has died, the General Secretary shall, as soon as practicable and no later than one month after receipt of the notification, remove Information in the National Register relating to that member of the clergy or lay person.	**Factual findings** We confirmed with the NRO that there were 0 deaths during the year (2024: 0). No further observations done. **Limitation in assessing compliance with relevant clause** None.

Requirements of the National Register Canon 2007	Factual findings
Work performed to address the above Clause We enquired of the NRO as to the number of instances where a member of the clergy or a lay person who had information relating to them on the Register had died during the period.	
Clause 11 of the National Register Canon 2007 Access to and disclosure of Information in the National Register shall, subject to sections 12 and 13, be limited to the following authorised persons: a) a Diocesan Bishop or delegate; b) the Bishop to the Defence Force or delegate; c) a Director of Professional Standards; d) the General Secretary; e) any person within the General Synod Office whose duties include assisting the General Secretary in maintaining the National Register; and f) such other persons as may be determined by the Standing Committee by a two-thirds majority; who agree to abide by the protocols under this Canon approved by the General Synod, or the Standing Committee by a two-thirds majority. **Work performed to address the above Clause** Reviewed the Authorised User register and ensured that the information disclosed for each user was limited to the following authorised persons: ▪ a Diocesan Bishop or delegate; ▪ the Bishop to the Defence Force or delegate; ▪ a Director of Professional Standards (DPS);	**Factual findings** We noted that during the year, there was 1 resignation and 9 new users, bringing the total authorised users to 59 as at 31 December 2025. We note the report provided had a total of 62 users, with three duplicates representing Users who have multiple roles and hence two accounts. For all 59 users, we inspected the application forms and ensured that the appropriate information was included. All forms were validated by the NRO and approved by the General Secretary. Within the online portal system, all searches of the register performed by an authorised user automatically gets logged with details of date, time, name of user, diocese, reason for search, and search name. This information has to be entered by the user before being allowed access to the register. Within the current system, all authorisation is granted by virtue of the user having accessed the web portal and entered all required information needed to create a search. We confirm that all applicants had declared to the General Secretary the reasons for access to the Register in every case. The Church Authority, to which the information will be disclosed, is a compulsory field when performing searches. It was noted that this field was completed for every search.

Requirements of the National Register Canon 2007	Factual findings
▪ the General Secretary; ▪ any person within the General Synod Office whose duties include assisting the General Secretary in maintaining the Register; and ▪ such other persons as may be determined by the Standing Committee by a two-thirds majority. We verified that an application form was completed and appropriately authorised.	**Limitation in assessing compliance with relevant clause** We were unable to confirm these secure usernames, passwords and security codes have not been passed on to unauthorised users.
Clause 12 of the National Register Canon 2007 The General Secretary, on application by a person to ascertain whether there is any Information, and if so to obtain a copy of the Information, in the National Register relating to that person, shall notify the person whether there is any such Information, and if so provide a copy of that Information to that person, in accordance with a protocol approved by the General Synod, or the Standing Committee by a two-thirds majority. **Work performed to address the above Clause** We enquired of the NRO to identify any instances / events whereby an application for information had been received. In the presence of the NRO, we observed the register to identify such instances. We reviewed records to reconcile the stat, and the occurrence under this clause. Where an application was made:	**Factual findings** There was 1 application made during the calendar year (2024: 1). This was tested with no exceptions noted. The application was from a person who wanted to see if there was any information about themselves on the Register. A response was provided in 39 days, noting that this occurred over the holiday period while the National Register Office was closed. **Limitation in assessing compliance with relevant clause** None

Requirements of the National Register Canon 2007	Factual findings
• We ensured that the application from was made by the person to whom it relates; • The identification was verified by a Justice of Peace (or equivalent); • A response was sent out in an appropriate time frame; • The information provided agrees to the access log.	
Clause 13 of the National Register Canon 2007 The General Secretary, on application by a person to ascertain whether there has been access to any Information in the National Register relating to that person by an authorised person, shall notify the person whether there has been any such access, and if so, provide details of that access to that person, in accordance with a protocol approved by the General Synod, or the Standing Committee by a two-thirds majority. **Work performed to address the above Clause** We enquired of the NRO to identify any instances / events whereby an application for information had been received. In the presence of the NRO, we observed the register to identify such instances. We reviewed records to reconcile the stat, and the occurrence under this clause.	**Factual findings** There was 1 application made during the calendar year (2024: 1). This was tested with no exceptions noted. The application was from a person who wanted to see if there was any information about themselves on the Register. **Limitation in assessing compliance with relevant clause** None

Requirements of the National Register Canon 2007	Factual findings
Clauses 14 (1), (2) and (3) of the National Register Canon 2007 The General Secretary, on application by a person to amend the Information in the National Register relating to that person, shall: ▪ amend the Information in the National Register relating to that person, or ▪ include a statement of the person in the National Register, subject to any limitation on the length of any amendment or statement determined by the Standing Committee, in accordance with a protocol approved by the General Synod, or the Standing Committee by a two-thirds majority. The General Secretary shall, as soon as practicable and no later than one month after making the amendment or including the statement referred to in subsection (1), notify by written notification each authorised person who has had access to that Information, other than the person or persons in subsections 11(d) and (e), of the making of that amendment or the inclusion of that statement. Each authorised person referred to in subsection (2) shall, as soon as practicable and no later than one month after the receipt of the notification referred to in subsection (2), forward a copy of that notification to each Church authority to whom the authorised person has disclosed the Information. **Work performed to address the above Clauses** We enquired with the NRO as to whether there applications for amendments by members of the clergy or lay persons of information in the Register in relation to them.	**Factual findings** There were no applications for amendment made during the calendar year. **Limitation in assessing compliance with relevant clause** None

Requirements of the National Register Canon 2007	Factual findings
We sighted the folder where notifications of amendments are stored.	
Clauses 15 (4) of the National Register Canon 2007 The General Secretary shall, as soon as practicable after the report of the audit has been provided to the Standing Committee, publish the report on the General Synod website. **Work performed to address the above Clause** We reviewed the General Synod website to confirm if audit report was uploaded onto the website.	**Factual findings** We inspected the General Synod website and found that the 2024 report had been correctly uploaded onto the website, within one month of the Standing Committee meeting. **Limitation in assessing compliance with relevant clause** None

The following are observations made regarding the National Register that can be considered in relation to its design and potential for improvement:

Consideration	Observations and Recommendations
Remote desktop access and log-in process	It was raised during the discussion that during the year, the server/remote desktop was unable to be accessed without access to the physical server. In this circumstance, the DPS's had to communicate to Matthew any search requirements. No data was lost during this outage, and the software provider (FriendlyWare) was able to fix the issue (SonicWall fault – hardware related). In order to access the required functionalities of the National Register, the NRO has two methods of logging in – one where they can sign into the DPS platform "development account", to authorise a DPS or new user, or to upgrade the software, and another "manager function" where they can use the search function.
Record keeping	Once certain data is removed, it is no longer recorded in the system. For example: • Once a police flag has been removed, it is no longer visible that the police flag was there. • Once a person has been removed from the register, they were recorded in a spreadsheet list kept outside of the Register, but they are not recorded on the Register's system as having been listed.
	When an authorised user makes a search on the Register, they must choose a reason for their search. However, there is no review of searches made, and search reasons are generic. Our review of the search history indicated a large number of searches (9265), 9161 of which related to searches for an individual applying, being invited or being issued a license, position or ordination within a Diocese. A review could be done to assess if the searches are in line with the Standing Committee's understanding of the operations across all the Diocese.
	Many of the records relating to the Register are kept outside the Register, including paper files, spreadsheets and emails. It may be possible to integrate some of this information with the Register, to centralise data.
	When a person is added to the Register, all users can view search details, however, there is no notification or listing of this information, so it would only be reviewed if another user were to search for that person. Conversely, when a person is removed from the Register, visibility is given to all DPS's for 2 – 4 weeks, so if there are any objections or further concerns, they can be raised before the person is removed from the Register altogether. This results in oversight over removals from the Register, but not over additions to the Register.

Consideration	Observations and Recommendations
Record keeping (cont.)	The system could notify relevant users for the following instances, to encourage updating of data on the Register: • Police checks – these are the responsibility of the DPS to update, however they can stretch for some time before a resolution is made and may not be regularly updated in the Register. A notification of open police checks in the Register could be made to the relevant DPS (the one who raised the police flag) on a periodic basis, to encourage keeping the Register up to date. • Address and contact details – these are the responsibility of the DPS to update, and when this information is not provided, the NRO cannot send out the required letters of notification. A notification of outstanding contact details could be sent periodically to the relevant DPS's, to encourage keeping the Register up to date and compliance with the notification period. • The notification period could also have a notification process, to alert the NRO to the due date of the Letter of Notification or any other relevant response times for information requests.
Internal Communication	The NRO is not always notified of staffing changes at each Diocese, which may delay the access of staff who should be authorised users. It may be beneficial to ensure a notification is sent to the NRO whenever a new Diocesan Representative, DPS or other relevant potential user is onboarded, to ensure that access can be arranged in a timely manner. This same process should be applied to users who are offboarded, so their access to the National Register can be removed in a timely manner.
	The system is designed to send messages between users to avoid overuse of emails. This process is not always used, so it is recommended that a standardised approach be used.
	Users cannot upload files into the Register's system. Adding this functionality could improve the record-keeping process by centralising relevant data in a secure environment, with supporting documentation linked to the relevant entry in the Register.
Reporting and Audit logs	Reports generated by the system could be periodically compared to the spreadsheets kept by the NRO, to ensure that both sources of information are up to date and correct.
	The following could be considered in an updated system to improve the reporting, audit logs and identification of abnormalities in the Register:

Consideration	Observations and Recommendations

Reporting and Audit logs (cont.)	• A report could be made to keep a digital trail of information that has been exported, and this could be reviewed on a periodic basis.
	• Exception reporting could be created, to consider the following, and be reviewed on a periodic basis:
	  ○ Searches performed outside of business hours.
	  ○ Searches performed that did not have a reason listed.
	  ○ Inactive users report
	  ○ Changes made to data in the Register during the period (changes to name, address, events, police flags or other details)