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Safeguarding Policy



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1. Introduction

1.1 The Mary MacKillop Spirituality Ministry (MMSM) is actively committed to fostering a culture of safeguarding that recognises and upholds the dignity and rights of all people. This commitment is outlined in detail in the MMSM Safeguarding Commitment Statement, along with MMSM's zero-tolerance of child or adult abuse, harm or exploitation.

1.2 This policy is part of the MMSM Safeguarding Framework, which also includes the MMSM Safeguarding Commitment Statement, the MMSM Code of Conduct, as well as supporting policy and procedure (refer Section 21) and [Appendix 1: Safeguarding Framework](#).

1.3 In line with MMSM's commitment to maintaining the highest standards of professional and ethical conduct, the MMSM Code of Conduct includes a detailed appendix outlining expected and prohibited safeguarding conduct and behaviours that must be followed by all MMSM Workplace participants.

1.4 This policy sets out MMSM's safeguarding approach and relevant responsibilities in accordance with the National Catholic Safeguarding Standards (NCSS) and the National Principles for Child Safe Organizations.

1.5 Terms used in this Policy are defined in [Appendix 2: Policy Definitions](#).

1.6 This policy applies to all workplace participants, which includes:

- The Board of Directors of MMSM
- MMSM committee members
- All employees
- Sisters in nominated roles
- Clergy in nominated roles
- Contractors
- Volunteer

1.7 This policy applies to all MMSM Centres and services.

1.8 This policy applies at all times.

2. Roles and Responsibilities

2.1 All workplace participants share responsibility for preventing abuse of children and adults-at-risk and creating a safe culture and are required to:

- Comply with this policy and the MMSM Code of Conduct.
- Uphold MMSM's values and safeguarding commitment, including its zero-tolerance approach to all forms of abuse.



- Respect the human rights of all children and adults-at-risk.
- Create and maintain a safe workplace culture environment that respects and upholds the safety of children and any adult who may be at risk.
- Comply with MMSM's duty of care to children, adults-at-risk and workplace health and safety obligations.
- Promote the safety, wellbeing, participation, and empowerment of all children in our care, taking into account children with a disability, First Nations children, and children from culturally and linguistically diverse backgrounds.
- Participate in all required Safeguarding training.
- Take all reasonable steps to protect children and adults-at-risk from abuse, including listening and responding to the concerns of children.
- Ensure any allegation of abuse is appropriately reported to regulatory authorities and MMSM in accordance with the MMSM Complaints and Grievance Management Policy and the MMSM Safeguarding Complaints Handling and Reporting Procedure.
- Provide an environment where all individuals associated with MMSM feel encouraged to play an active role in developing a culture of risk minimization and adults a risk and child safety.

2.2 The MMSM Board

The Board is responsible for:

- Overseeing the Safeguarding Framework, ensuring that safeguarding is embedded in the organization's strategy.
- Having systems in place to ensure the CEO implements the safeguarding framework, including periodically reviewing the effectiveness of the framework in accordance with this Policy.
- Create and maintain an organizational culture where the best interests of adults are at risk and children are at the heart of the organization.
- Develop organizational control and compliance systems that ultimately prevent, detect, and respond to harm.
- Ensure safeguarding is a regular agenda item at MMSM Board meetings.
- Champion safeguarding practices both internally and externally.
- Convene on an urgent basis to support and guide decision-making in the event of suspected child abuse or breach of the safeguarding policy or code of conduct.
- Provide verbal and written reports to the Members about MMSM's safeguarding performance.
- Raise any significant matters of concern with the Members and / or



Workplace Participants as appropriate.

- Nominate a representative to the Safeguarding committee.

2.3 The MMSM Safeguarding Committee

Members of the Safeguarding Committee are appointed by the Board under a term of reference. The Committee is responsible for overseeing the implementation and continual improvement of the safeguarding framework, including to:

- Monitor implementation of the Safeguarding Framework across the organization, including through regular reporting, annual audits and other periodic reviews.
- Identify and address systemic issues resulting from analysis of specific safeguarding incidents
- Provide advice on and develop relevant safeguarding approaches and strategies.
- Provide guidance and support to the Board and to the Safeguarding Coordinator.
- Document the activities of the Committee, including meeting agendas and minutes. Ensure records are securely retained.

2.4 MMSM

The CEO is responsible to:

- Operationalize the safeguarding framework.
- Role model and encourage the intent of the MMSM Code of Conduct.
- Report on implementation of the Safeguarding Framework to the Safeguarding Committee.
- Ensure that safeguarding practices are included in relevant organizational planning processes and documents.
- Ensure safeguarding is a regular agenda item at staff meetings.
- Ensure all staff are aware of their safeguarding roles and responsibilities.
- Ensure that adequate human and financial resources are allocated to safeguarding.
- Champion safeguarding practices both internally and externally.
- Ensure that safeguarding is incorporated into the organization's complaints management policy and mechanisms.
- Proactively address barriers to receiving complaints and feedback, including tackling power imbalances that may inhibit feedback.
- Ensure the organization has a functional, reliable and confidential

whistleblowing mechanism.

- Comply with requirements of the CEO as head of the organization in relation to Reportable Conduct Schemes.
- Oversee safeguarding investigations and any disciplinary action against Workplace Participants.
- Make required external reports (or ensure that such reports have been made) to statutory bodies, such as reportable conduct, child protection or the police.
- Participating in the Safeguarding Committee.

2.5 MMSM Safeguarding Coordinator

MMSM has a dedicated safeguarding role. The role is responsible to:

- Ensure the Safeguarding Framework meets relevant legislation, child safe standards, and the Australian Catholic Safeguarding Standards.
- Develop processes and tools that support full implementation of the Safeguarding Framework.
- Complete annual safeguarding self-assessments/audits and develop an implementation plan as per NCSS 9.1.1.
- Support the CEO to complete internal reports to the Safeguarding Committee regarding implementation of safeguarding framework.
- Design child-friendly and user-friendly materials that communicate the organization's approach to safeguarding across its diverse client groups.
- Lead awareness raising about the organization's safeguarding framework, including sharing good safeguarding practices across the organization.
- Ensure that key stakeholders are empowered to participate in the ongoing development of the organization's approach to safeguarding. This should include a range of engagement strategies from participation to co-design.
- Role model safeguarding practices, encouraging an open culture that supports all people to report suspected safeguarding breaches.
- Support the Corporate Services Manager to ensure the SM's Risk Management Framework incorporates safeguarding across each step of risk management.
- Introduce and support the use of risk assessment tools that enable all Spirituality Ministry Centres and programs to identify, understand and manage safeguarding risks.
- Design and deliver safeguarding training plan that ensures all Workplace Participants understand their safeguarding roles. This includes induction and ongoing training delivery.



- Provide technical guidance to the Directors and Heads of Units to implement safeguards in their areas.
- Conduct internal workplace safeguarding investigations or oversee external investigations.
- Ensure that records are kept and maintained for all aspects of safeguarding complaints and investigations.
- Map local service environment, ensuring that referral pathways are in place.
- Attend Safeguarding Committee meetings to provide updates, feedback and advice on safeguarding practice and opportunities for systemic improvement.

2.6 MMSM National Operations Manager

The National Operations Manager is responsible for ensuring that safeguarding practice is implemented across all MMSM Centres.

- Promote safeguarding practice across their region, including sharing information about safeguarding at meetings and forums.
- Actively encourage feedback from workplace participants and Centre users.
- Provide opportunities for training, supervision, and ongoing support across the workforce.
- Complete and monitor Centre Risk Management Plans, inclusive of risk assessments completed by Centre Hosts.
- Ensure Centres have context specific policies, procedures, and protocols to meet the requirements of the Safeguarding Framework.
- Ensure all third-party providers and third-party partners implement appropriate safeguarding standards.
- The National Operations Manager will participate on the Safeguarding Committee.

2.7 MMSM Manager Marketing and Business Development

This role is responsible to:

- Ensure that the organization's external-facing communications promote the organization's safeguarding commitments, including accessible information about raising safeguarding complaints.
- Ensure donors, journalists, and photographers are briefed and signed onto the safeguarding policy ahead of any visits or engagement with the organization.
- Ensure that the Media guidelines, including how we manage stories, images, and consent, are implemented across the organization.

2.8 Centre Hosts

Centre Hosts are responsible to:

- Role model the safeguarding conduct outlined in the MMSM Code of Conduct.
- Ensure that all Centre users are aware of the organization's safeguarding framework. This includes ensuring that information is accessible for all Centre users.
- Support and develop programs, services, and systems to ensure that the requirements of the Safeguarding Framework are met.
- Understand and communicate with direct reports and teams the responsibilities they hold to ensure that programs, services, and operations are safe for children and mitigate foreseeable risks.
- Complete Centre Risk Assessments, including identifying and assessment safeguarding risks.
- Implement risk mitigation actions to reduce potential safeguarding risks.
- Implement safe recruitment practices for volunteers and contracted third parties.
- Ensure all new Workplace Participants and third parties have completed induction, including safeguarding induction, and regular training, including safeguarding training.
- Ensure that safeguarding is included in the team's line management and performance appraisal processes.
- Ensure that safeguarding is a standard agenda item at Centre staff and volunteer meetings.
- Ensure Centre users are consulted and empowered to share their views about issues which impact them.
- Encourage team members to speak up and raise safeguarding concerns without fear of retaliation.
- Act as focal points for receiving safeguarding complaints and implementing safeguarding improvements in their Centres.
- At least one Centre Host will participate in the Safeguarding Committee.

2.9 Finance and Corporate Services Manager

This role is responsible to:

- Receive and manage safeguarding concerns or complaints.
- Set safeguarding requirements in the organization's risk management framework, including establishing tools and processes.
- Set safeguarding recruitment processes for Workplace Participants and third parties and contracted third parties.



- Implement safe recruitment practices for staff.
- Ensure safeguarding is incorporated into performance review and supervision processes.
- Monitor implementation of the organization's safeguarding training plan, ensuring enterprise-wide compliance.
- Ensure that records are kept and maintained for all aspects of safeguarding recruitment, training and performance reviews.
- Conduct workplace investigations (or engage investigators) for safeguarding complaints or allegations raised about the organization's Workplace Participants.
- Recommend and undertaking remedial action as a result of safeguarding investigations
- Include safeguarding in the annual staff engagement survey.

3. Community Engagement

3.1 Community Partnership

MMSM appreciates the importance of partnering with children, adults-at-risk, families, parents, carers and the broader community to create a safe environment. MMSM will encourage the community to take an active role in safeguarding at MMSM by:

- Ensuring MMSM Safeguarding Framework documents are published on the MMSM website and are easily accessible.
- Informing children and adults-at-risk of their rights, particularly the right to be safe when accessing MMSM services or programs.
- Promoting open dialogue with service users, adults-at-risk, families and the community.
- Providing the contact details of the MMSM Safeguarding Coordinator.
- Issuing an annual performance report on the implementation of Safeguarding at MMSM, including summarizing safeguarding evaluations or audits and publishing MMSM's compliance with the National Catholic Safeguarding Standards. Refer Appendix 3 for Report Template.
- Actively promoting safeguarding, including adult safeguarding, child safety campaigns and child abuse prevention in its community.

3.2 Empowering children and adults-at-risk

MMSM recognizes the importance of engaging with and empowering children and adults-at-risk. MMSM will:

- Use age and developmentally appropriate strategies to seek feedback from children and adults-at-risk that access MMSM services or ministries.



- Use age and developmentally appropriate strategies to seek feedback from children and adults-at-risk during the scheduled review of this Policy (every two years). MMSM will seek feedback about what makes children and adults-at-risk feel safe or unsafe when they are with MMSM.
- Consult with children and adults-at-risk about decisions that affect them (when relevant to the service).

3.3 Respecting Diversity

MMSM acknowledges that some groups of people are at increased risk of abuse, including First Nations children and adults-at-risk, children and adults-at-risk from culturally and linguistically diverse backgrounds, children and adults-at-risk with disability, children and adults-at-risk that are unable to live at home or with family supports and diverse sexual young people or adults-at-risk. MMSM will:

- Remain alert to additional safety risks that people from diverse groups face to stay safe
- Consider the ways that diverse groups can raise a complaint if they feel unsafe when they are with MMSM.

MMSM is committed to respecting and valuing Aboriginal and Torres Strait Islander children and adults-at-risk. MMSM acknowledges, with respect and wonder, the traditional custodians of the sacred lands on which MMSM Centres stand. MMSM will:

- Acknowledge traditional custodians of Country on which Spirituality centres stand.
- Pay respect to elder's past, present and emerging during all workshops and events.
- Support children and adults-at-risk attending centres to express their culture and enjoy their cultural rights. This includes providing training to the Board, staff and volunteers to actively support and facilitate participation and inclusion within the organization by Aboriginal children and their families.
- Not tolerate racism of any kind. Racism is prohibited through the MMSM s Code of Conduct.

4. Recruitment

4.1 SM is committed to safeguarding and implementing its zero-tolerance approach through its recruitment process.

4.2 All recruitment must comply with MMSM's Recruitment Policy and Procedure which outlines safeguarding processes at each stage of recruitment,



including:

- Requiring the MMSM Safeguarding Commitment Statement in all role advertisements.
- Requiring role descriptions (including staff, volunteer and contractor) to include:
 - the MMSM Safeguarding Commitment Statement.
 - a safeguarding classification, according to the role level of contact with children or adults-at-risk. Roles classified as Child – connected or adults-at-risk – connected have additional recruitment and screening requirements.
- Requiring at least one question about safeguarding in all interviews that tests the candidate's alignment with the MMSM Safeguarding Commitment Statement. Candidates for child or adult connected roles are asked additional, behavioural based questions to test their suitability.
- Documenting at least two verbal reference checks that include at least one question that test a person's alignment with MMSM's safeguarding commitment. Referees for candidate's applying for child or adult connected roles are asked additional questions to test the candidate's suitability to work with children or adults-at-risk.

4.3 All MMSM workplace participants are required to have a National Criminal History Check. Candidates that pose a risk to children or adults-at-risk will no progress to contracting.

4.4 All MMSM workplace participants that work with children will be required to hold a current Working with Children Check in the state they are working. All MMSM workplace participants that work with adults-at-risk are required to hold a current Working with Vulnerable People Check (where available).

4.5 MMSM will monitor the status of state-based working with children/vulnerable people checks and will update its records where the status of these checks' changes.

4.6 All workplace participants have safeguarding terms and conditions in their contract/agreement with MMSM. This includes the requirement to comply with the MMSM Code of Conduct and this Safeguarding Policy.

5. Risk Management

5.1 MMSM recognizes the importance of identifying, monitoring, and mitigating risk to children and adults-at-risk.

5.2 MMSM will:

- Consider actual and potential risks relating to children and adults-at-risk as part of the MMSM Risk Management Policy.
- Identify, assess and mitigate safeguarding risks in all MMSM environments, including our physical sites and Centres and any online environments.



- Use computers, social media and any other online environment in line with MMSM Policies, including the Code of Conduct, Social and Digital Media Policy, IT Usage Policy,
- Identify, assess and mitigate safeguarding risks of all MMSM activities and programs, taking into account the age and needs of the children, and risks to adults, the nature of the activities undertaken and the particular risks they might present.
- Promote understanding by all workplace participants of this policy and of MMSM's expectations outlined in the Code of Conduct when interacting with children and adults-at-risk and the consequences of failing to abide by those expectations.
- Provide annual training and support for all workplace participants.

6. Safeguarding with Other Third Parties

6.1 From time to time, MMSM hires its accommodation, conference and meeting facilities to third parties. Contractual arrangements specify safeguarding considerations, including safeguarding terms and conditions and expectations of facility use.

6.2 All MMSM facilities have clear visible and accessible signage and information about safeguarding on display, including information about how to raise safeguarding concerns. We make schools or other third parties aware when they are sharing facilities with other public guests, with a reminder about the school's (or other third party's) responsibility for active supervision.

6.3 MMSM have processes in place to monitor implementation of terms and conditions of third parties.

7. Safeguarding in our Communications

7.1 From time-to-time MMSM creates communication materials, including stories and/or images, to share or promote its work. This material will be respectful and uphold the dignity of everyone featured.

7.2 In all cases informed consent will be sought and documented using the MMSM Consent Form (refer Appendix 4). In the case of images or stories about children, the child's agreement will be sought as well as their parent/carer's informed consent. In the case of adults-at-risk with impaired decision making, their agreement will be sought as well as their carer or authorized decision maker's informed consent. Special care is taken to ensure children and adults-at-risk are safeguarded.

7.3 MMSM will protect children and adults-at-risk by not naming them in captions or other information, avoiding displaying identified information, ensuring the image and/or story portrays them with dignity and respect, not revealing identifying information in file labels or when sending material electronically, and reducing the ability to download images from the MMSM website.

8. Safeguarding Complaints

8.1 MMSM's Complaint Management Policy outlines MMSM's approach to Managing Complaints, including safeguarding complaints and MMSM 's Safeguarding Complaints Handling and Reporting Management provides details procedures for safeguarding complaints.

8.2 Anyone can raise a complaint, including children, adults-at-risk, parents/guardians, carers, independent support people, community members or workplace participants.

8.3 It is mandatory for all workplace participants to immediately report safeguarding complaints that they receive themselves or any reasonable belief about safeguarding breaches that they form themselves.

8.4 A safeguarding complaint includes any reasonable belief about:

- A breach of the MMSM Code of Conduct or Safeguarding Policy.
- Any MMSM workplace participant engaged in child abuse or inappropriate behaviour towards a child or adult at risk (regardless of whether the child or adult at risk is associated with the MMSM).
- A child or adult at risk who needs protection from harm.
- Alleged abuse towards a child or adult at risk associated with the MMSM, including historical allegations.
- Abuse between two or more children associated with the MMSM.

8.5 A reasonable belief is formed when a person believes that:

- A child or adult at risk is in need of protection, or
- A child or adult at risk has suffered or is likely to suffer harm.
- A reasonable belief is formed if a reasonable person in the same position would have formed the belief on the same grounds. A reasonable belief is different from having proof and does not require certainty; however, it is more than suspicion, there must be some objective basis for the belief.
- A reasonable belief might be formed if the person:
 - Observed the conduct themselves.
 - Receives a direct or indirect disclosure from a child or adult at risk that abuse has occurred, or there is concern that they will be abused or harmed. This might include a disclosure about someone else that has been abused or harmed.
 - Observes signs or indicators from the child or adult at risk's behaviour or development that indicate abuse may have occurred.
 - Receives information from another credible source (including someone that knows the child or adult at risk or another witness).
- All Workplace Participants should be aware of red flags and indicators of abuse. In particular, Workplace Participants should recognize the diverse circumstances and experiences of the children that MMSM interacts with.

8.6 MMSM provides multiple pathways to raise a complaint.



Complaints can be made by:

- Phone: 02 9634 2317.
- Email: safeguarding@mmsm.org.au
- In Person: to the Finance and Corporate Services Manager or any trusted MMSM representative.
- By Mail: Finance and Corporate Services Manager, 33 Barina Downs Road, Norwest, NSW, 2153
- Online: www.mmsm.org.au

8.7 Any person who in good faith raises a complaint will not be disadvantaged or prejudiced and will be protected from victimization.

8.8 Reporting Obligations:

It is mandatory for all workplace participants to immediately (today, not tomorrow) report safeguarding complaints, including both internal and external reporting requirements. The MMSM Safeguarding Complaint Handling and Reporting Procedure outlines the process for MMSM workplace participants to make internal and external reports. In summary:

- Internal Reports are made to the Finance and Corporate Services Manager. Reports can also be made to the CEO in the Finance and Corporate Services Manager absence (or if the report relates to the Finance and Corporate Services Manager.) Workplace participants may also use the MMSM Whistleblowing Policy reporting pathways if they wish to make a protected report. Internal reporting will not delay external reporting.
- External Reporting, including processes to:
 - Report any potential criminal offences (including historical allegations of child abuse) must be reported to the Police.
 - Follow Mandatory Reporting requirements.
 - Follow reportable conduct scheme reporting requirements.
 - Except for reporting the information, the reporter will treat the matter with strict confidence.

8.9 Managing complaints:

- MMSM takes all complaints and allegations of child abuse seriously and will address them in a timely and confidential manner in accordance with the Safeguarding Complaints Handling Policy and Reporting Procedure.
- All complaints related to the conduct of MMSM workplace participants will be investigated by MMSM. If the matter has been reported to the Police or other statutory authorities MMSM will seek their permission before commencing internal processes.
- If a workplace participant has an allegation made against them, they will be withdrawn from active duty immediately. The protection of the victim is the most important consideration.

9. Information Sharing

- 9.1 It is important that Workplace Participants maintain the confidentiality and privacy of all parties to a safeguarding complaint and share information on a need-to-know basis.
- 9.2 Needs to know includes requirements to share information about complaints that include potential criminal conduct, reportable conduct or that raise concern that child is in need of protection, as outlined in section 9 above.
- 9.3 Needs to know also includes requirements to share information internally with appropriate MMSM representatives, in accordance with the MMSM Safeguarding Complaints Handling and Reporting Procedure. This ensures that the complaint is appropriately managed.
- 9.4 Information should only be shared in accordance with legislation, including the Privacy Act 1988 (Cth) and information sharing guidelines in each state, outlined in the MMSM Safeguarding Information Sharing and Record Keeping Procedure. Sharing of information with the consent of the adult at risk or parent/carers of children is preferred, but MMSM note that consent is not required to share information if it is in the best interest of the child or adult at risk's safety. When in doubt about information sharing, SM assesses risks and is guided by what is in the best interest of the child or adult at risk.

10. Record Keeping

- 10.1 MMSM recognizes the importance of keeping accurate and complete records as a part of its safeguarding strategy.
- 10.2 MMSM will collect, use, disclose and hold personal information in accordance with the Privacy Act 1988 (Cth), the MMSM Privacy Policy and the MMSM Safeguarding Information Sharing and Record Keeping Procedure.
- 10.3 MMSM will retain records related to recruitment, screening (including criminal history checks, working with children checks or working with vulnerable people checks), employment and training records for fifty (50) years and will ensure that they are kept securely.
- 10.4 All safeguarding complaints and reports must be recorded in accordance with the Safeguarding Complaints Handling Policy and Reporting Procedure, and Safeguarding Information Sharing and Record Keeping Policy.
- 10.5 MMSM will retain records related to safeguarding complaints securely for fifty (50) years and will ensure that they are kept securely. This includes records related to the complaint, any associated internal reports and



communication, external reports to authorities such as the police, child protection or regulators, referrals to external agencies, workplace investigations, and disciplinary outcomes.

- 10.6 MMSM will ensure that workplace participants with responsibilities under this policy or its associated procedures are appropriately trained to undertake those responsibilities.
- 10.7 MMSM will ensure that all Workplace Participants undertake regular training on safeguarding and their obligations, including induction and refresher training at least every two years.
- 10.8 Safeguarding Induction and other safeguarding training must comply with MMSM Induction and Training Policy.
- 10.9 Safeguarding induction introduces MMSM's approach to safeguarding, including this Safeguarding Policy, the Safeguarding Code of Conduct, Safeguarding Complaints Handling and Reporting Procedure, and Safeguarding Information Sharing and Record Keeping Procedure.
- 10.10 Safeguarding Training at least every two years refreshes safeguarding induction topics, and also includes safeguarding risk management, inclusion, diversity and equity, children's rights and participation, cultural safety, and identifying and responding to safeguarding concerns and disclosures.
- 10.11 MMSM ensures safeguarding is part of the professional supervision processes and annual performance reviews, as outlined in the Induction and Training Policy and comply with the MMSM Performance and Misconduct Policy.
- 10.12 MMSM ensures that safeguarding is a regular topic at all staff and volunteer meetings.
- 10.13 Any breach of this policy will constitute misconduct and MMSM may take appropriate disciplinary action, including up to (however is not limited to), guidance or specialized help, education or training, counselling and / or suspension, termination of engagement or dismissal from employment, service, or involvement with MMSM.
- 10.14 Breaches may also be referred to authorities, such as the police and/or external regulatory authorities.

11. Policy Review

- 11.1 A review of this policy shall be conducted every two years or earlier if required, such as due to changes in legislation or following a critical incident.
- 11.2 The Chair of the MMSM Board or her/his delegate is responsible for ensuring that this policy is reviewed and updated as needed.

11.3 The review will seek feedback from workplace participants and from children and adults that access MMSM programs or services.

11.4 The review will analyse safeguarding incidents and complaints, ensuring that lessons learned are included in policy updates.

11.5 Outcomes of the review will be included in the MMSM Annual Safeguarding Performance Report.

12. Related Policies, Procedures, Documents, and Legislation

12.1 This policy should be read in conjunction with the following related MMSM documents:

- Code of Conduct
- All other documents in the Safeguarding Framework (Refer Appendix 1), including the Safeguarding Commitment Statement, Safeguarding Policy and the range of supporting Policy and Procedures:

<ul style="list-style-type: none"> - Privacy Policy - Discrimination Harassment and Bullying Policy - Delegations of Authority Policy - Recruitment Policy - Procurement Policy - Induction & Training Policy - Managing Performance & Misconduct Policy - Risk Management Policy - IT Usage Policy - Bookings and Cancellation Policy - Social and Digital Media Policy - Complaints and Grievance Management Policy - Whistleblowing Policy 	<ul style="list-style-type: none"> - Recruitment Procedure - Third party contract template - Risk Assessment Tool - Risk Register - Risk Management Plan - Consent Forms - Safeguarding Complaints Handling & Reporting Procedure - Safeguarding Information Sharing and Record Keeping Procedure
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This policy has been created to support MMSM to comply with relevant safeguarding legislation in each state that MMSM operates.



	Child Protection	Screening Checks	Child Safe Standards	Reportable Conduct	Children's Commissioner/ Advocate
Victoria	<i>Children, Youth and Families Act 2005 (Vic.)</i>	<i>Worker Screening Act 2020 (Vic.)</i>	<i>Child Wellbeing and Safety Act 2005</i>	<i>Child Wellbeing and Safety Act 2005 (the Act).</i>	<i>Commission for Children and Young People Act 2012 (Vic.)</i>
New South Wales	<i>Children and Young Persons (Care and Protection) Act 1998 (NSW)</i>	<i>Child Protection (Working with Children) Act 2012 (NSW)</i>	Children's Guardian Act 2019 NSW	Children's Guardian Act 2019 NSW	Advocate for Children and Young People Act 2014 NSW
Tasmania	<i>Children, Young Persons and their Families Act 1997 Tas</i>	<i>Registration to Work with Vulnerable People Act 2013 (Tas.)</i>	<i>Child and Youth Safe Organisations Act 2023 (Tas)</i>	<i>Child and Youth Safe Organisations Act 2023 (Tas)</i>	<i>Commissioner for Children and Young People Act 2016 (Tas.)</i>
South Australia	<i>Children and Young People Safety Act 2017 SA</i>	<i>Child Safety (Prohibited Persons) Act 2016 SA</i>	n/a	n/a	<i>Children and Young People (Oversight and Advocacy Bodies) Act 2016</i>
Western Australia	<i>Children and Community Services Act 2004 (WA)</i>	<i>Working with Children (Criminal Record Checking) Act 2004 (WA)</i>	n/a	<i>Parliamentary Commissioner Amendment (Reportable Conduct) Act 2022 (WA)</i>	<i>Commissioner for Children and Young People Act 2006 (WA)</i>

Appendix 1: Safeguarding Policy Framework

Mary MacKillop Spirituality Ministry Safeguarding Framework

Informed and Supported by

OUR MISSION

We provide opportunities that nurture hope and the flourishing of life within a safe, welcoming and respectful Josephite environment, through faith-based formation, education, heritage, conference and pilgrimage experiences.

OUR VISION

To grow a sustainable and innovative ministry that offers opportunities for transformative experiences in spirituality and mission.

OUR VALUES

Creative Courage | Welcoming Hospitality | Mutual Respect | Conscious Compassion | Intentional Inclusivity

CORE SAFEGUARDING DOCUMENTS



SAFEGUARDING COMMITMENT

The Mary MacKillop Spirituality Ministry is actively committed to fostering communities and a culture of safeguarding that recognises and upholds the dignity and rights of all people.

We have zero tolerance for child and adult abuse.

We believe that all people have the right to be safe and respected. We commit to establishing a safe environment and supportive relationships for all with whom we have contact.

Informs

Informs



Safeguarding Policy

Informed by the Commitment



Code of Conduct

Informed by the Commitment

LINKED POLICIES AND PROCEDURES



Human Resources

Delegations of Authority Policy
Discrimination, Harassment & Bullying Policy
Recruitment Policy
Inductions & Training Policy
Performance Policy

PROCEDURES & TOOLS

- Recruitment Procedure

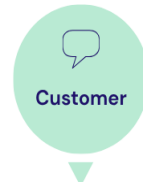


Finance & Operations

IT Usage Policy
Cyber Security Policy
Privacy Policy
Procurement Policy
Risk Policy

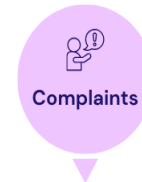
PROCEDURES & TOOLS

- Third Party Contract Template
- Risk Register
- Risk Assessment Tool & Plan



Customer

Social Media Policy
Web Content Policy
Communications Policy
Bookings & Cancellations Policy



Complaints

Complaints Policy
Workplace Participant Grievance Policy
Whistleblowing Policy
Complaints Management Policy

PROCEDURES & TOOLS

- Complaints Handling & Reporting Procedure
- Child Safety Reporting Form
- Information Sharing & Record Keeping Procedure

Appendix 2: Safeguarding Policy Definitions

Adult	Any person 18 years or older.
Adult at Risk	Any adult who is at increased risk of experiencing abuse, such as people: <ul style="list-style-type: none"> • who are elderly • with a disability • who suffer from mental illness • who have diminished capacity • who have cognitive impairment • who have suffered previous abuse • who are experiencing transient risks • who in receiving a ministry or service are subject to a power imbalance • who identify as Aboriginal and/or Torres Strait Islander • who are from a culturally and linguistically diverse background • who are of diverse sexuality • who have any other impairment or adversity that makes it difficult for them to protect themselves from abuse.
Adult Abuse	The improper treatment of a person that results in the actual and/or likelihood of causing physical or emotional harm. Abuse can come in many forms, such as physical or verbal maltreatment, neglect, injury, assault, violation, rape, unjust practices, crimes, exploitation, or other types of aggression. There are several categories of abuse of adults, such as: <ul style="list-style-type: none"> • Sexual abuse • Physical abuse • Emotional/psychological abuse • Neglect • Elder abuse • Financial abuse • Exploitation • Spiritual abuse.
Child	An individual under the age of 18 years unless otherwise stated under the law applicable to the child.
Child abuse	There are different legal definitions of child abuse in Australia. This Policy uses an overarching definition sourced from the Australian Institute of Family Studies ¹ . Child abuse and neglect refer to any behavior or treatment by

¹ <https://aifs.gov.au/resources/resource-sheets/reporting-child-abuse-and-neglect>

	<p>parents, caregivers, other adults or older adolescents that results in the likelihood of and/or actual physical or emotional harm to a child or young person.</p> <p>Such behaviors may be intentional or unintentional and can include acts of omission (i.e. neglect) and commission (i.e. abuse) (CFCA, 2018).</p> <p>Child abuse and neglect is commonly divided into five subtypes:</p> <ul style="list-style-type: none"> • physical abuse • emotional or psychological abuse • neglect • sexual abuse or exploitation • exposure to family violence. <p>Child abuse and neglect can be face to face or online.</p> <p>Refer to the MMSM Safeguarding Complaints Handling and Reporting Procedure for detailed legal definitions of each form of child abuse in each of the states where MMSM manages Centers.</p>
<p>Child – connected work</p>	<p>Work that is authorized by the MMSM and is performed by an adult in connection with MMSM while children are present or reasonably expected to be present.</p>
<p>Grooming</p>	<p>(child) refers to a pattern of behavior aimed at engaging a child as a precursor to sexual abuse. It includes establishing a ‘special’ friendship/relationship with the child. Grooming can include the conditioning of parents and other adults to think that the relationship with the child is ‘normal’ and positive.</p> <p>Grooming includes the ways a person who intends to sexually abuse a child or young person will:</p> <ul style="list-style-type: none"> • gain access to the child or young person • create the conditions for the abuse to happen • ensure they won’t get caught. <p>Grooming behaviors can be difficult to identify and don’t necessarily ‘look’ explicitly sexual, directly abusive, or criminal. In these cases, the main difference between acceptable behaviors and grooming behaviors is the motivation of the perpetrator to ultimately abuse the child or young person.</p> <p>(adult) is the predatory act of maneuvering another individual into a position that makes them more isolated, dependent, likely to trust, and more vulnerable to abusive behavior.</p>
<p>Members</p>	<p>The Members are the Trustees of the Spirituality Ministry (MMSM)</p>

Leaders and Centre Managers	Sisters in leadership and lay employees in management roles.
Sister	For the purposes of this policy, 'Sister' refers to a woman who has taken public vows dedicating herself to apostolic works, as a member of the Sisters of Saint Joseph.
Spirituality Ministry (SM)	A company, Spirituality Ministry (MMSM) of the Sisters of St Joseph, ACN 144 962 774, a company limited by guarantee.
Volunteer	Volunteering is willingly given for the common good and without financial gain. Formal volunteer positions require recruitment, induction, and training. People are recognized by MMSM as formal volunteers, following their regular and consistent volunteering service or for a specific volunteering event.
Workplace Participant	MMSM Board, Centre Managers, Sisters in nominated roles, lay employees, Clergy in nominated roles and formal volunteers.

Appendix 3: Safeguarding Annual Report: Template

Safeguarding at the Spirituality Ministry

Annual Report 2025

This report provides an overview of the ways the Spirituality Ministry nurtures a safe environment for children and adults-at-risk, including the implementation of its Safeguarding Framework.

Our services for children and adults-at-risk

Summary of programs and services where children, young people or adults-at-risk attend spend time.

Use an infographic or similar to highlight data including numbers of adults-at-risk, children and young people as clients – disaggregated if possible.

Our commitment to safeguarding

Insert commitment statement

Safeguarding Risks

Include a summary of any activities or processes to understand and manage safeguarding risks across the organization.

Highlight any particular high risk



insert quote from chair or CEO





Our approach to safeguarding

Insert a summary of the Policy settings:
Leadership, governance and culture
Diversity and inclusion, including cultural safety for Aboriginal children and young people.

Participation of children, young people and their families or carers.

Recruitment, training and support – ensuring safe people.

Reducing risk in physical and online environments

Complaints management – ensuring child focused approaches.

Insert a summary of Safeguarding Code of Conduct

Setting and enforcing behavioural standards that uphold the Ministry's Safeguarding commitment.

Link to any newly created brochures or child friendly information here.

Safeguarding by numbers:

Use an infographic or similar to highlight data

- Number of Workplace Participants and third parties (disaggregated by employee, volunteer, contractor, third party)
% that have completed child safeguarding induction. % that have completed additional child safety training.
% with national police clearance.
% with WWCC.
- Number of safeguarding related complaints (disaggregated %age by report type making clear the number

Highlights from 2025

Include a summary list of the things that have been undertaken to strengthen safeguarding this year.

This section could also include (or be replaced by a case study to highlight good practice).

Include information, including an overview or summary of findings and recommendations from any audits or reviews (taking into consideration privacy and information sharing limits).



of reportable conduct complaints).
% of cases currently open/closed.
The information about complaints should include some additional details to explain how complaints are managed at the Spirituality Ministry.

Safeguarding Committee Report

Include a summary report of activity from the Safeguarding Officer and/or the Safeguarding Committee
This should include an update on implementation of the safeguarding quality improvement plan.
It could also include information from the Employee Engagement/Culture Survey.

Our forward focus

Include a section on what the Ministry will focus on for the following year.

Appendix 4: Consent Form

Consent Form for Video, audio, photography and stories.

I _____ of

[Print name]

[insert, city, state, and country]

Consent and agree that the Mary MacKillop Spirituality Ministry (MMSM) can take

photographs
video
audio recording
interview, quotes, or opinions (personal
formation)

myself
 another adult for whom I'm an authorised decision
maker:

_____ [Print name]

my child: _____ [Print
name, age]

I consent to using this information being used in:

*include detailed information about any and all media including on the internal publications,
external publications, internet, in print, electronic or video media*

- | | |
|---|---|
| <p><input type="checkbox"/> I consent to the information being held and used by MMSM for the next 5 years, after which time the material will be deleted by MMSM.</p> <p><input type="checkbox"/> I understand that I can withdraw my consent at any time by contacting MMSM.</p> <p>I understand that it may be outside of MMSM's control to remove any information that has already been published online or printed in publications.</p> <p><input type="checkbox"/> I acknowledge that MMSM is not responsible for how my and/or my child/ward personal information are used by any person outside of MMSM.</p> | <p><input type="checkbox"/> I agree that any use of the photographs, video or audio recording, quotes or opinions may occur without compensation or additional consideration by me and/or my child/ward.</p> <p><input type="checkbox"/> I have read the above release prior to signing it (or had the contents translated and/or explained to me), understand the contents and am competent to execute this form.</p> <p><input type="checkbox"/> I am freely providing this consent and am authorised to do so.</p> |
|---|---|

[Name]

[Signature]

[Date]

Internal Only:

MMSM Person Witnessing consent:

[Name]

[Signature]

[Date]



Mary MacKillop Spirituality Ministry

If consent is provided for a child (any person aged under 18) or an adult at risk with impaired decision-making, they have been informed about how their information and/or photo will be used and have they provided agreement.

Yes

No

Photo, video, audio, story reference No: [Click or tap here to enter text.](#)

Date recorded: [Click or tap here to enter text.](#)