



SPIRITUALITY MINISTRY OF SISTERS OF SAINT JOSEPH

Safeguarding Complaints Handling Policy and Reporting Procedure

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Responsible person	Chair SM Board	Scheduled review date	18 October 2025



SAFEGUARDING COMPLAINTS HANDLING POLICY AND REPORTING PROCEDURE

SPIRITUALITY MINISTRY OF SISTERS OF SAINT JOSEPH

MISSION STATEMENT

In the spirit of St Mary MacKillop of the Cross, the Spirituality Ministry of the Sisters of St Joseph serves groups and individuals seeking a place that nourishes “spirit” offering spiritual refreshment, renewal, quiet, beauty, peace relaxation.

COMPLAINTS HANDLING POLICY

1. INTRODUCTION

- 1.1 The Spirituality Ministry (SM) takes all allegations of child abuse and child safety complaints seriously.
- 1.2 The SM has a zero tolerance of child abuse. It will be guided by its child safeguarding commitment statement and broader values and strategic vision.
- 1.3 This document sets out the SM’s policy for managing child safety complaints and the procedure that Workplace participants and the SM must follow in relation to reporting and responding to child safety complaints. It should be read in conjunction with the SM’s Child Safeguarding policy and the Child Safeguarding Code of Conduct.

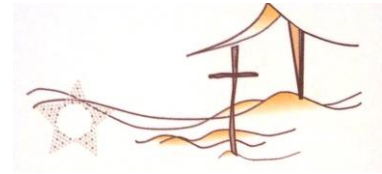
2. Scope

- 2.1 Everyone is responsible for creating and maintaining a child safe culture.
- 2.2 This policy applies to all Workplace Participants.

3. Definitions

- 3.1 A ‘complaint’ includes any allegation, suspicion, concern, disclosure, or report:
 - (a) Of a breach of the SM’s Child Safeguarding Code of Conduct or other Safeguarding Policy or Procedure;

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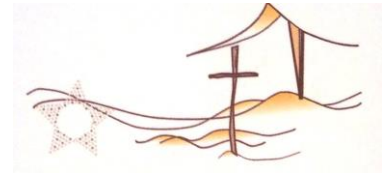


- (b) That any person included at 2.2 of this policy, has engaged in child abuse or inappropriate behaviour towards a child (regardless of whether the child is associated with the SM;
 - (c) About, or relating to, child abuse in an institutional context;
 - (d) Regarding abuse between two or more children associated with the SM;
 - (e) Of historical allegations of child abuse; and
 - (f) Regarding alleged abuse towards a child associated with the SM.
- 3.2 A complaint can be made by anyone – including a child, adult survivor, parent, trusted adult, independent support person, community member or any Workplace participant (complainant).
- 3.3 'Board' means the Board of Directors of SM;
- 3.4 'Members' means the members of SM as prescribed by the Constitution of SM;
- 3.5 'Workplace participants' means:
- (a) Directors of SM;
 - (b) Sisters of St Joseph in nominated roles;
 - (c) employees of SM;
 - (d) Clergy in nominated roles;
 - (e) contractors; and
 - (f) volunteers.

4. Principles

- 4.1 The SM takes all child safety complaints seriously and will respond to each complaint in accordance with this policy and the relevant procedure.
- 4.2 SM will ensure that persons with responsibilities under this policy or its associated procedure are appropriately trained to undertake those responsibilities.
- 4.3 Any person who in good faith, raises a complaint or discloses an allegation of child abuse will not be disadvantaged or prejudiced and will be protected from victimisation. Reports will be dealt with in a timely and confidential manner.

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4.4 The SM and Workplace participants will be guided by the following principles:

- (a) The safety of all children will be the utmost priority when responding to any child safety complaints;
- (b) It is difficult for all individuals, particularly children, to disclose abuse and an appropriate response to any disclosure is critical for the recovery process of a survivor;
- (c) It is important that the SM and all Workplace participants reduce barriers that are in place for individuals who disclose, such as by publicising information on how to raise concerns, providing different pathways and allowing different methods of raising concerns;
- (d) The SM will support any Workplace participants who makes a complaint or report regarding suspected child abuse and state that they do not need the – consent to make an external report;
- (e) In responding to complaints, Workplace participants and the SM, will pay particular attention to the needs of First Nations children, children with disability, and children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and children with diverse needs;
- (f) When responding to complaints, the SM will be mindful of any conflicts of interests that may exist;
- (g) When responding to complaints, SM will keep accurate and appropriate records; and
- (h) The SM will investigate any complaints in accordance with the principles of natural justice and procedural fairness.

5. Roles and responsibilities

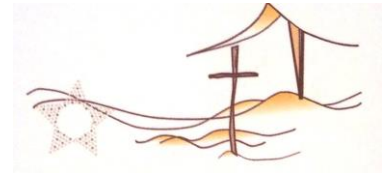
5.1 In relation to responding to child safety complaints, the relevant roles and responsibilities are set out below.

5.2 Workplace participants will:

- (a) Be familiar and comply with this policy and its associated procedure;
- (b) Undertake any training required by SM about this policy.

5.3 The SM Board will have responsibility for the review, implementation, reporting on and monitoring of this policy.

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6. Reporting to Members

6.1 The SM recognises its responsibilities to its Members and will keep Members informed of the application of this policy, subject to its privacy obligations.

7. Privacy and record keeping

7.1 All child abuse complaints, incidents, allegations, disclosures, concerns, and referrals must be carefully recorded. This confidential information must be stored, protected, and retained for fifty (50) years.

7.2 At all times, the confidentiality of all individuals involved, particularly children, must be maintained and information regarding the complaint should only be shared on a need-to-know basis. Workplace participants and the SM must comply with its privacy policy.

8. Breach of this policy

8.1 Any breach of this policy may result in disciplinary action, including up to termination of engagement or employment.

9. Review

9.1 A review of this policy shall be conducted every three (3) years or earlier if required, such as due to changes in legislation.

9.2 The Board is responsible for ensuring that this policy and its procedures are reviewed and updated as needed.

10. Related policies, procedures, documents, annexures, and legislation

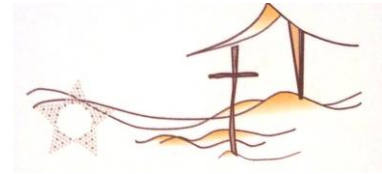
10.1 This policy should be read in conjunction with the following related documents:

- (a) Annexure 1 Child Safety Reporting Form
- (b) Child Safeguarding Commitment Statement
- (c) Child Safeguarding Policy
- (d) Child Safeguarding Code of Conduct
- (e) Safeguarding Risk Management Policy and Framework

(The above policy and framework are currently under review. Approval and implementation have been prioritised)

- (f) Safeguarding Information Sharing and Record Keeping Policy

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(g) Privacy Policy

(The above policy is currently being developed and the approval and implementation process has been prioritised)

(h) Managing Underperformance and Disciplinary Policy

(The above policy is currently being developed and the approval and implementation process has been prioritised)

(i) Vos Estis lux Mundi

(j) Integrity in the Service of the Church

(k) Integrity in Ministry

10.2 Relevant legislation is listed in the procedures below.

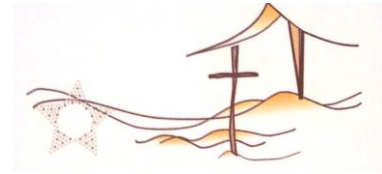
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Spirituality Ministry Board
Approval date: 18/10/2022

David Bergman
Chairperson
Spirituality Ministry Board

Signature: _____

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Safeguarding Complaints Reporting Procedures

This section sets out the reporting procedures in relation to a safeguarding complaint. Workplace participants must comply with their reporting obligations which apply to them personally..

These procedures must be read in conjunction with the Safeguarding Complaints Handling Policy.

Key Roles and Responsibilities

All Workplace Participants have responsibilities to be familiar with the policy and this procedure and to know how to respond to a complaint.

There are some additional responsibilities for key roles within SM:

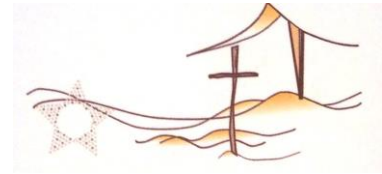
- Centre Managers
 - First point of contact for a complaint;
 - Manage the complaint through the policy and procedure until its conclusion;
 - Notify and keep the Chair informed of the progress of a complaint.
- Chair
 - Point of contact for the Centre Managers;
 - Liaison point for the Centre Managers and the Board;
 - Notify and keep the Members informed as appropriate.
- Directors
 - Review and support the implementation of the policy and this procedure;
 - Support training opportunities for Workplace Participants in the implementation of the policy and this procedure;
 - Stay informed on matters concerning Child Safeguarding and complaints handling.

Procedures to respond to a complaint

When responding to a complaint, there are eight (8) steps that MUST be followed. Each of these steps are described in detail below. The steps are:

1. **Step one** – **initial, response**
2. **Step two** – **assess reporting obligations**
3. Step three – internal report
4. Step four – initial Risk Assessment
5. **Step five** – **internal investigations**
6. Step six – support and communication with complainant
7. **Step seven** – **monitoring, support and communication with respondents**
8. Step eight – evaluation.

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Step one – first response

When a Workplace participant becomes aware of a complaint through a disclosure, the person must be mindful of their first response. They should:

- Let the complainant use their own words to explain what has occurred;
- Reassure them that you take what they are saying seriously, and it is not their fault and that they are doing the right thing;
- Do not leave them in a distressed state. If they seem at ease in your company stay with them, otherwise get support from the Centre Manager or a staff member;
- Keep a clear written record of the conversation (either during if possible or immediately after);
- Offer the child or adult complainant support or pastoral care as appropriate;

If the complainant is the child survivor:

- Try to separate them from other children discreetly and listen to them carefully;
- If you believe that the child is at immediate risk of harm, do all within your legal power to ensure the child's immediate safety, such as calling 000. Explain to the child that this information may need to be shared with others, such as with their parent / care giver (if safe to do so), specific people in your organisation, or to regulatory authorities; and
- Do not make promises to the child such as promising not to tell anyone about the incident, except that you will do your best to keep them safe.

Step two – assess your reporting obligations

SM requires Workplace participants to report information pertaining to alleged child abuse to the state statutory child protection service, regardless of whether they are listed as a mandatory reporter.

Mandatory Reporter Guide (MRG)

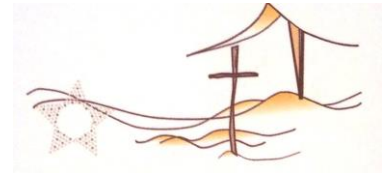
The [Mandatory Reporter Guide \(MRG\)](#) is a child protection assessment tool. A number of “decision trees” (sections such as physical abuse, neglect, psychological harm) ask a series of questions to determine if the significant risk threshold is met.

Make an external report

To make a report, please contact the **Child Protection helpline on 132 111**.

And/or **Ring the Police on 000**.

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Co-operate with Regulatory Authorities

All Workplace Participants will cooperate with any investigation by the Police/Department of Communities and Justice/ Office of the Children's Guardian. Support will be provided to the child(ren) as appropriate. All correspondence from regulatory authorities should be directed to Chair, SM Board.

The SM will not interview the child further or otherwise investigate until the Police/Department of Communities and Justice/ Office of the Children's Guardian have provided it with permission to do so.

Workplace participants are encouraged to seek support from the Centre Managers but are not required to do so before making a report.

Step three – internal report

As soon as possible after the disclosure, record the information using the complainant or survivor's words. Workplace participants must then notify the Centre Manager (if not already completed) in addition to discharging any mandatory reporting obligations. The Child Safety Reporting Form (Annexure 1) should be used wherever possible.

The Centre Manager will notify the Chair. The Chair will advise the SM Board as required.

If the complaint relates to alleged abuse by a Workplace participant, this must immediately be reported to the Chair.

If the complaint relates to alleged abuse by a Centre Manager, the Workplace participant must immediately report this to the Chair.

Sisters and Clergy are also obliged to follow the Canonical reporting processes and procedures for complaints involving the alleged sexual abuse committed by a sister, clergy, or other religious.

If the matter is an historical allegation (including under the National Redress Scheme) or involves a claim of compensation, the matter will in the first instance be considered by the Board. The Board may seek advice from the Members.

Step four – initial Risk Assessment

The Centre Manager will complete or support an initial risk assessment to identify and minimise any risk to children, the complainant, the respondent, and the proper investigation of the complaint. This will include considering and mitigating any conflicts of interest.

The risk assessment should be updated throughout the response and investigation process.

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If the complaint or disclosure of child abuse involves allegations against a Workplace participant, and there is a risk that the person may come into contact with children, the Centre Manager (or Chair if the complaint is against a Centre Manager) must then remove the accused person from active duty, which could entail:

- standing down (with pay, where applicable);
- re-assignment to other duties that do not have direct contact with children;
- or to work under increased supervision while the matter is being investigated.

SM will consider any specialist advice in determining what action to take in relation to a Workplace participant subject to a complaint under the policy and this procedure. Complaints against workplace participants will be managed with reference to the managing underperformance and disciplinary policy.

Step five – internal investigations

All Workplace participants will co-operate with any investigation by a regulatory authority. No internal investigation or interview will commence until clearance has been provided by the relevant state regulator and / or Police.

Should the complaint relate to a Sister of St Joseph or a member of the Clergy, the SM will refer the complaint to the appropriate Catholic Professional Standards authority.

Once any required clearance has been provided, the SM may investigate allegations relating to an incident of abuse in accordance with its obligations and to the extent reasonably practicable. In some circumstances, it may be necessary for the SM to conduct an investigation in addition to any investigation conducted by authorities (e.g. Under state reportable conduct schemes).

Workplace participant must co-operate fully with any internal investigation by the SM.

The SM will make every effort to keep any investigation confidential; however, from time-to-time other people may need to be consulted in conjunction with the investigation (e.g. to provide witness statements). The SM will ensure that any conflicts of interest are considered and managed.

An investigation conducted by the SM will be conducted in accordance with procedural fairness to protect the integrity of the investigation and the interests of all the participants involved in the investigation. Any Workplace participant who is implicated in a complaint will be given an opportunity to respond.

In some circumstances, it may be appropriate for the SM to engage a person (or persons) from outside the SM to conduct an independent investigation or provide advice in relation to allegations, such as a legal representative.

Following any internal investigation, findings and recommendations should be made. The SM will assess whether the allegation is substantiated on the balance of probabilities and

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if any substantiated allegations amount to a breach of its Child Safeguarding Code of Conduct or any other policy or procedure. The complainant will be notified of the outcome.

The findings of the investigation will also be reported to any external body as required (e.g. If the reportable conduct scheme applies, the SM will provide an interim or final report to the office of the children’s guardian within 30 calendar days of making the report).

Following any investigation, an updated risk assessment should be undertaken to ensure risks to children are managed.

The SM has full discretion to put in place safety management plans or take disciplinary action (including increased supervision, disciplinary action, dismissal or summary dismissal) where it forms a reasonable belief that it is not safe for a Workplace participant to interact with children in accordance with its duty of care.

Step 6 – support and communication with complainant

As part of the SM’s duty of care and commitment to pastoral care, the SM will ensure support is provided to children impacted by abuse. This may include:

- Observing and monitoring the child’s behaviour;
- Referring the child to support and pastoral care where appropriate;
- Arranging a support person for the child; and
- Liaising with appropriate professionals.

The SM will also offer adult complainants pastoral care, a personal meeting or a direct personal response, or support as required.

Step 7 – Monitoring, support and communication with respondents (Workplace participants)

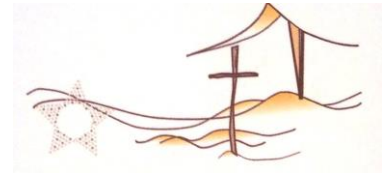
As part of the SM’s duty of care and commitment to pastoral care, the SM will provide support to respondents who have been identified within the context of a complaint or allegation. This may include:

- Monitoring and supporting the wellbeing of the respondent;
- Arranging a support person for the respondent;
- Referring the respondent to counselling and / or pastoral care where appropriate;
- Ensuring the respondent has a safe place to stay and consideration given to other practical and financial needs; and / or
- Ensuring access to spiritual direction.

The Spirituality Ministry will ensure that all complaints are responded to promptly and procedural fairness is applied.

The SM will ensure that the respondent is informed of the allegation with sufficient detail.

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The SM will remain in regular contact with the respondent and ensure that the respondent is kept informed of the progress of the investigation as appropriate.

The SM will inform the respondent in writing of the outcomes of the investigations and also inform the respondent of their right to a review.

Step 8 - evaluation

At the conclusion of any complaint process, the Board will initiate a review to determine if any changes should be made to the policy or these procedures.

A final risk assessment will be undertaken to ensure risks to children are managed.

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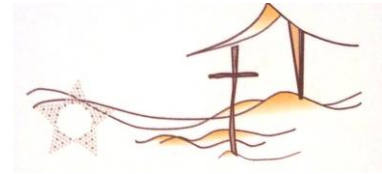


Annexure 1

Child safety reporting form

Please see the Centres website for a digital copy of the Child Safety Reporting form. A copy of the form is also included overleaf.

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Spirituality Ministry of the Sisters of Saint Joseph Child Safety Reporting Form

If you believe a child is at immediate risk of abuse phone 000.

Send the completed form to Saint Joseph's Centre for Reflective Living, Baulkham Hills on safeguarding@stjosephscentre.org.au or the Saint Joseph's Spirituality & Education Centre Kincumber South on safeguarding@stjosephsretreat.org.au. Additionally:

- If person making report is a workplace participant, the form must be sent to Centre Manager at either Baulkham Hills or Kincumber South.
- Centre Managers at the Centres must send the report to the Chair of the SM Board.
- Reports must be made to relevant state-based statutory Child Protection Service (see contact details page 4 of this form).

All incident reports must be stored confidentially and securely.

Details of the child

Name:	
Date of birth (if known):	
Address (if known):	
Child's contact number (if known and age appropriate):	
Resides with (if known):	

Details of the child's parents

Name:	
Address (if known):	
Contact number (if known):	

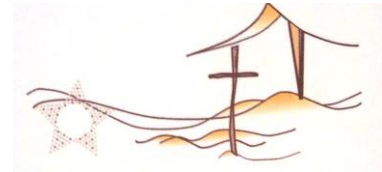
Details of person filling in this form

Name:	
Contact details:	
Role	Indicate selection via x <input type="checkbox"/> Child <input type="checkbox"/> Workplace participant <input type="checkbox"/> Parent / carer / guardian <input type="checkbox"/> Concerned member of the community <input type="checkbox"/> Anonymous

Alleged incident details

Date of alleged incident:	
Time of alleged incident:	
Location of alleged incident:	

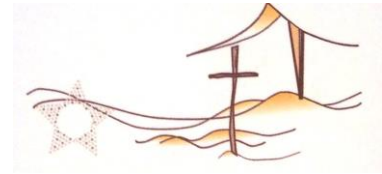
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Date identified (if different from date of incident)	
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Please describe the alleged incident

Overview:	
<p>What do you understand to have occurred? Please provide as much detail as possible.</p> <p>If a child has made a disclosure, please include the words the child used to disclose the alleged incident.</p>	
<p>Who is the child allegedly at risk from? Identifying details if possible, including name and relationship to child and frequency of contact.</p>	
<p>Where did the alleged incident occur?</p>	
<p>Witnesses to the alleged incident?</p>	
<p>Other information:</p>	



Please categorise the incident

	Make selection	Comments
Physical violence		
Sexual offence		
Sexual misconduct		
Serious emotional or psychological abuse		
Serious neglect		
Grooming		
Breach of the Spirituality Ministry (SM)'S Child Safeguarding Code of Conduct		
Reportable conduct		

Proposed Corrective Action and Mitigation Plan

Action	Responsible person	Date (completion)	Status

Does the child identify as Aboriginal or Torres Strait Islander?

(Mark with an 'x' as applicable)

No Yes, Aboriginal Yes, Torres Strait Islander

Is the child from a culturally or linguistically diverse background?

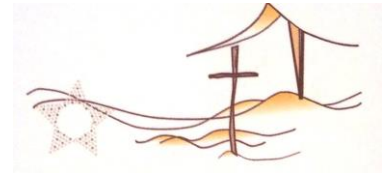
(Mark with an 'x' as applicable)

No Yes, please provide details:

Does the child have a disability?

A disability can be any physical, sensory, neurological disability, acquired brain injury, intellectual disability, or developmental delay that affects a child's ability to undertake everyday activities.

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(Mark with an 'x' as applicable).

No Yes, please provide details:

Office use only

Date incident report received:		
Person managing incident:		
Incident ref. Number:		
Has the incident been reported?	Date notified	Comments
Child protection		
Police (event number if known)		
Another third party (please specify):		

State

Contact

New South Wales	Child Protection Helpline on 132 111
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