

## Procedure

### Initial Assessment

1. The CEO, on receiving a safeguarding complaint, disclosure, allegation, or suspicion of abuse, in consultation with the ISMAPNG Safeguarding Unit, conducts an immediate assessment to identify and minimize any risk to children or vulnerable adults.

Where a complaint of sexual abuse is assessed as plausible and there is a risk that the alleged perpetrator might come into contact with children or vulnerable adults, that person is stood down from their role or ministry while the complaint is investigated.

2. The CEO, in consultation with the ISMAPNG Safeguarding Unit, determines the procedure appropriate to the complaint, including reporting to external and internal authorities and providing support to all those involved:
  - Minor infringements of the Code of Conduct (e.g. blurring of professional boundaries) to be managed by the CEO.
  - Major complaints, including all cases of sexual abuse, to be managed by the ISMAPNG Safeguarding Unit.
3. Complaints against the CEO are managed by the MML Board Chair in consultation with the ISMAPNG Safeguarding Unit.
4. Historical complaints (pre 17/10/2013) are managed by the ISMAPNG Safeguarding Unit.

### Managing Minor Complaints

The CEO or delegated person:

1. Assesses the likely risk to children and vulnerable adults and minimises any risk as per **Initial Assessment** above.
2. Establishes a file in accordance with the MML Safeguarding Information and Record Keeping Policy.
3. Reports to internal and external authorities as determined above.
4. Provides for support for all involved as determined above.

5. Investigates the complaint in accordance with the MML Safeguarding Investigation procedure.
6. Determines appropriate outcomes in accordance with the MML Complaints Management Policy, the ISMAPNG Complaints Policy and with the Institute Leader, in relation to a Sister.
7. Informs the complainant and the person against whom the complaint has been made of the outcome and provision for appropriate ongoing support.
8. Finalises and stores all records in accordance with the MML Safeguarding Information and Record Keeping Policy.
9. Reviews policies and procedures to ensure continuous improvement.
10. Reports to the MML Board.

### Handling Major Complaints

1. Major complaints are handled by the ISMAPNG Safeguarding Unit in consultation with the CEO, in accordance with the relevant ISMAPNG and MML Safeguarding policies and procedures.
2. The CEO informs the MML Board Chair that a significant complaint has been received. The MML Board Chair informs the Institute Leader.
3. The ISMAPNG Safeguarding Unit manages the complaint process and informs the CEO of the outcome of the process including any recommended improvements to MML safeguarding policies and procedures arising from its review.
4. The ISMAPNG Safeguarding Unit stores the original file and informs the CEO of its reference number and location. The CEO records the file details in the Complaint Register.
5. The CEO reports outcomes to the MML Board Chair.
6. Board Chair reports outcomes to the ILT.

### Protected Disclosures

In line with the National Catholic Safeguarding Standards (NCSS Standard 6), ISMAPNG extends protection for those who report suspected child abuse or other reportable incidents. Through this policy, the Institute ensures that all personnel are made aware of their rights and

protections in reporting any child safety or other concerns.

When a person makes a Protected Disclosure:

- their identity must remain confidential according to their wishes;
- they will be protected from reprisal, discrimination, harassment or victimisation for making the disclosure;
- an independent internal inquiry or investigation will be conducted using the Investigations Procedure;
- issues identified from the inquiry/investigation will seek to be resolved and/or rectified; and
- they will be informed about the outcomes (so far as practicable).

### **Disciplinary Action**

Where a complaint is substantiated, disciplinary action may include remedial education, counselling, warnings, supervision, restrictions, termination and official reports to police and other statutory agencies as required. Sisters may also be subject to restriction of ministry as determined by the Institute Leader.

### **Appeal Process**

An appeal against a designated outcome may be addressed to the MML Board Chair. Sisters may address an appeal against restriction of ministry to the Holy See.

### **Supporting Documents**

Code of Conduct

Privacy Policy

Safeguarding Complaints Management Policy

Safeguarding Investigations Procedure

Safeguarding Governance: Roles and Responsibilities

ISMAPNG Restrictions on Ministry Policy

ISMAPNG Complaints Management Policy

**Version Control Page**

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