



RCTC-P11_25 COMPLIANCE MANAGEMENT POLICY

1.0 OBJECTIVE

- 1.1 The objective of the Compliance Management Policy ('Policy') is to provide a uniform and committed system and process to ensure that the Catholic Diocese of Townsville ('Diocese') meets its obligations. These comprise relevant laws, including the Code of Canon Law, regulations, industry and organisational standards which impact on the day-to-day activities of the Diocese and its Agencies, Ministries and Parishes.

2.0 SCOPE

- 2.1 This Policy promotes the development and maintenance of a compliance culture and the upholding of good corporate governance practices.
- 2.2 This Policy applies to the compliance provisions contained in Diocesan and Agency policies, and to all other compliance obligations of the Diocese and its Agencies, Ministries and Parishes.
- 2.3 Some compliance obligations under this Policy reflect the requirements of legislation, breaches of which may be punishable under law.

3.0 POLICY STATEMENT

- 3.1 The Diocese is committed to upholding its obligations and its values, integrity and reputation, and must comply with:
- Government legislation and regulations;
 - The Code of Canon Law;
 - Diocesan and Agency policies and organisational standards;
 - Contractual obligations.
- 3.2 Compliance with obligations demonstrates, in the clearest possible terms, the Diocese's absolute commitment to:
- the highest standards of ethics and compliance with all applicable laws, regulations, rules and policies;
 - the detection and correction of non-compliance in a timely manner; and
 - eliminate misconduct and other wrongdoing.
- 3.3 Behaviours that create and support compliance are encouraged and behaviours that compromise compliance are not.
- 3.4 All compliance issues within the Diocese will be subject to the requirements of this Policy and the diocesan Compliance Management System (Schedule 1), which are based upon the International Standard *AS/ISO19600:2015 Compliance Management Systems – Guidelines*.
- Compliance obligations are identified and the compliance risk assessed using the methodology set out in the diocesan *Risk Management Policy*;

- Training requirements to manage the compliance management system are identified and addressed;
- The Diocese and its Agencies are able to demonstrate their compliance management systems and processes through documentation and practice;
- Performance of the diocesan Compliance Management System (Schedule 1) will be monitored and reported;
- The compliance management system will be regularly reviewed and continually improved.

3.5 The Diocese manages the diverse nature of its ministry and business undertakings across the Agencies as autonomous divisions. Each Agency is required to establish, implement and review appropriate compliance management governance such as policies, guidelines, committees, reporting and systems to identify obligations, assess compliance risk, identify control measures and implement mitigations to best meet compliance obligations. Formal reporting requirements are outlined in Schedule 2: Compliance Management Roles and Responsibilities.

4.0 APPLICABILITY

4.1 The Policy applies to all Church personnel of the Diocese and its Agencies. Some larger agencies (e.g., Catholic Education, Centacare NQ) will have their own compliance policy/process that meets their particular requirements and are in accord with the terms and intent of this Policy, including the reporting requirements in Schedule 2.

5.0 RESPONSIBILITIES

Policy Owner	The Policy Owner for all diocesan policies is the Bishop.
Policy Manager	The Policy Manager for this Policy is the Diocesan Governance, Compliance and Risk Coordinator.
Communication	<ul style="list-style-type: none"> • The Policy Manager is to advise all Agencies, Ministries and Parishes covered by this Policy and its enacted date. • The Parish Priest or Parish Administrator is to advise the Parish staff and committees of this Policy and its compliance. • The Senior Executives are to provide advice and communicate this Policy to all Agency/Division staff and volunteers.
Compliance	<ul style="list-style-type: none"> • Each Senior Executive is responsible for implementing appropriate policy/systems/processes for their Agency/Division to effectively identify and manage compliance obligations. • The Bishop is to be advised of any compliance risk that remains at an unacceptable level. • Non-compliance with this Policy should be reported to the relevant Senior Executive (or their delegate) and the Policy Manager who will report to the Bishop. In all instances of serious non-compliance matters the Bishop must be informed.
Monitoring and Review	The Policy Manager has responsibility to review the Policy every three years (or sooner if required) to ensure it is compliant with relevant diocesan goals, legislation/regulation and diocesan requirements. The review will be undertaken in collaboration with Senior Executives.
Reporting	<ul style="list-style-type: none"> • Reporting requirements for ongoing management of compliance obligations across the Diocese are outlined in Schedule 2. • The Policy Manager will report to the Bishop at the time of the Policy review.
Accessibility	This Policy will be available to external diocesan stakeholders and placed on the diocesan website.

6.0 SCHEDULES TO THIS POLICY

Schedule 1	Compliance Management System
Schedule 2	Roles and Responsibilities
Schedule 3	Compliance Management Key Documentation
Schedule 4	Compliance Management Templates
Schedule 5	Annual Agency/Division Compliance Certificate

7.0 RELATED POLICIES, PROCEDURES AND/OR LEGISLATION

Code of Canon Law

Canon 22: When the law of the Church remits some issue to the civil law, the latter is to be observed with the same effects in canon law, insofar as it is not contrary to divine law, and provided it is not otherwise stipulated in canon law.

Canon 1284: §1 All administrators are to perform their duties with the diligence of a good householder.

§2 Therefore they must:

3° observe the provisions of canon and civil law, and the stipulations of the founder or donor or lawful authority; they are to take special care that damage will not be suffered by the Church through the non-observance of the civil law.

Legislation, Standards and Policy

- Roman Catholic Church (Incorporation of Church Entities) Act 1994 (Qld)
- AS/ISO19600:2015 Compliance Management Systems - Guidelines
- Catholic Diocese of Townsville Risk Management Policy

Version Date	Enacted Date	Comments
March 2022	March 2022	Original Policy
June 2025	June 2025	Updated Policy
Date for Review	June 2028	

Approved By:



Date: 12 June 2025

Most Rev Timothy Harris DD
Bishop of Townsville

DEFINITIONS

Code of Canon Law: The Code of Canon Law is the collection of laws which govern the public order of the Catholic Church. The current code was promulgated in 1983 by Pope John Paul II. In this document, the quoted canons are from the English translation of the Latin text by the Canon Law Society of Great Britain and Ireland.

Church Personnel: A cleric, member of a religious institute or other person (other than a cleric or a member of a religious institute) who is employed by the Roman Catholic Trust Corporation for the Diocese of Townsville or engaged on a contract, subcontract, voluntary or unpaid basis. (Australian Catholic Safeguarding LTD: *National Response Protocol*)

Compliance: Compliance is meeting all compliance obligations of the Diocese, Agencies, Ministries and Parishes.

Compliance Control Measures An action/activity that modifies compliance risk and assists an organisation to meet their compliance obligations.

Compliance Management System: A set of interrelated processes set up to ensure that the compliance obligations of the organisation are identified, registered and monitored and the impacts minimised.

Compliance Obligation: A requirement specified by laws, regulations, codes, Canon Law or organisational standards.

Non-compliance: Non-compliance is an act or an omission whereby the Diocese, Agency, Ministry or Parish does not meet its compliance obligations, processes or behavioural obligations.

Organisational Standards: Documented policies, codes of ethics, codes of conduct, good practices and charters that the Diocese, Agencies, Ministries and Parishes have adopted across their operations.

Responsible Person: One of the Church personnel who has responsibility to manage a particular compliance obligation and to ensure that the compliance obligation has been entered onto and maintained on the Diocese and/or Agency Compliance Registers.

SCHEDULE 1: COMPLIANCE MANAGEMENT SYSTEM

S.1.1 Overview

Good compliance practices are part of normal business operation within the Diocese and in its Agencies, Ministries and Parishes. The diocesan Compliance Management System is based upon the International Standard *AS/ISO19600:2015 Compliance Management Systems - Guidelines*, and comprises:

- the Compliance Management Process outlined in Figure 1;
- implementation of Compliance Control Measures;
- review and monitoring of the Compliance Control Measures;
- review and monitoring of the Compliance Management Policy and System.

Agency Senior Executives are required to establish, implement and review appropriate compliance management systems, either in accordance with this process, or through an alternative system which meets the reporting requirements in Schedule 2. Priests and Parish Administrators are supported in contributing to the Compliance Management System, to achieve compliance with the obligations of the Parish.

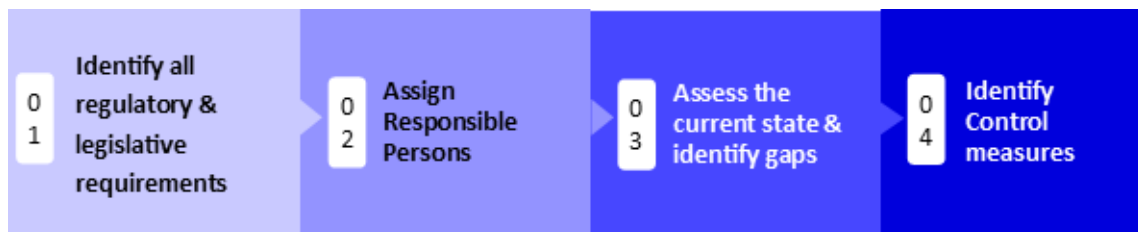


Figure 1: Compliance Management Process

S.1.2 Stage 1: Identify all regulatory and legislative requirements

Identification of the Diocese's statutory obligations, or changes in these obligations, is an ongoing activity undertaken by Senior Executives and designated Responsible Persons. Compliance obligations may include the following:

- Reporting requirements (e.g., provision of statistics or information on a regular basis);
- Requirements for accreditation, registration or licensing;
- Complying with timeframes set down by the legislation for performing activities;
- A requirement to provide a specified service or range of services;
- Restrictions or limitations on how these services can be marketed and offered;
- Financial obligations.

These obligations must be recorded in Compliance Obligation Registers (Schedule 4) to map the Diocese's compliance obligations and record Responsible Persons.

S.1.3 Stage 2: Assign Responsible Persons

For each compliance obligation identified within the Compliance Obligation Registers, a Responsible Person or Person(s) will be appointed. The Responsible Person(s) is accountable for:

- Assessing risks associated with the obligation and recommending necessary control measures to ensure that the obligation is met and non-compliance risks are minimised;
- Providing guidance and support to all personnel in meeting the obligation;
- Reporting identified non-compliance;
- Liaising with external parties relevant to that obligation;
- Ensuring that the obligation is monitored on a regular basis and met;
- Recording and maintaining the entry in the Compliance Obligation Registers and assisting in required reporting.

S.1.4 Stage 3: Assess the current situation and identify gaps

For each compliance obligation, existing compliance control measures are identified (Figure 2). The current level of risk associated with meeting each obligation will be assessed in accordance with the diocesan *Risk Matrix*.

Where gaps are identified, these will be managed with additional compliance control measures. Compliance, or its failure, is a risk, and compliance, as an action or outcome, is a significant step in managing risk. Compliance risk can be characterised by the likelihood of occurrence and the consequences of non-compliance, in accordance with the diocesan *Risk Management Policy*.

S.1.5 Stage 4: Develop compliance control measures

Figure 2 identifies the interrelating network of compliance control measures to meet the compliance obligations of the Diocese.

- Governance documents such as policies, procedures, guidelines, work instructions or manuals, registers and templates, amongst others.
- Business systems that support compliance monitoring, reporting and risk management.
- Business processes that clearly identify compliance and risk owners, processes around incident and breach reporting, communication processes, escalation procedures, and all other internal controls in place.
- IT systems, including information technology used to support compliance and risk management.
- Training and professional development to ensure compliance obligations are understood and met both strategically and operationally.
- Audit and review to provide ongoing feedback about the effectiveness of compliance control measures and the compliance management process.

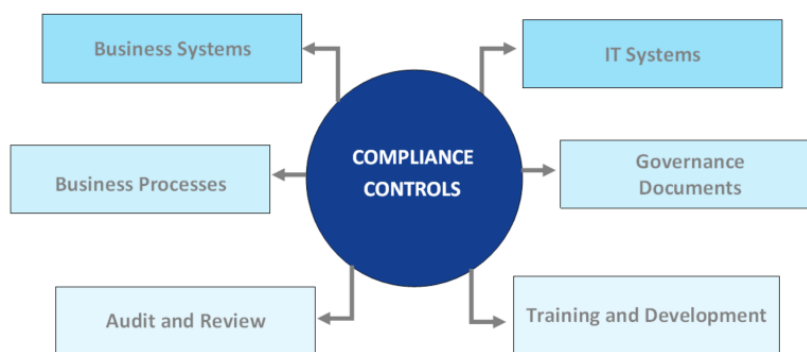


Figure 2 – Compliance Control Measures

S.1.6 Additional compliance considerations

S.1.6.1 Contractual obligations

In a future stage of implementation of the compliance process, the Diocese will develop a list of all contractual obligations with any third parties. This is to ensure that responsible persons are assigned to assist in the management of all contractual obligations.

S.1.6.1 Canon law and Catholic Mission

The structures and procedures for governance within the Diocese, including compliance management, are grounded in an understanding of the Australian mission of the Church. Such governance elements are in alignment with the requirements of canon law concerning Church governance.

S.1.7 Compliance management recording and reporting

Effective reporting which captures core data and removes inconsequential information is critical in achieving targeted, relevant and attainable outcomes for managing compliance risk.

- Each year, Senior Executives will prepare the Annual Agency/Division Compliance Management Certificate (Schedule 5) which will be reviewed by the Agency Council and the Diocesan Finance Council (DFC) and approved by the Bishop. The Certificate will be prepared each year to coincide with the Agency reporting of their Audited Financial Statements to the DFC. The Certificate will reflect the twelve month period prior to the date of preparation of the Certificate.
- Any occurrences of non-compliance or poor compliance, which are rated as a high-level risk, are to be included in the Agency/Division High-Level Risk Register.
- The Diocese, in conjunction with the Senior Executives, will develop and maintain a Diocesan Compliance Register. Each year, the Diocesan Curia Leadership Group (DCLG) and the DFC will receive the Annual Diocesan Compliance Management Report, which will include:
 - Diocesan Compliance Register (non-Agency);
 - Diocesan High-Level Compliance Risks and Controls and Mitigation Plans (from the Diocesan Risk Register).

S.1.8 Monitoring, review, communication and consultation

Continual monitoring and reviewing of compliance registers is essential to maintain the effectiveness and appropriateness of compliance control measures, ongoing risk assessments and identification of emerging compliance requirements. Effective communication, consultation and education in compliance management are necessary to achieve a successful integration of the compliance management processes into the business.

The compliance management systems and processes adopted by the Agencies/Division should be supported through the provision of specific training and education programs for personnel involved in compliance management.

SCHEDULE 2: ROLES AND RESPONSIBILITIES

Role	Compliance Management Responsibility	Frequency
Bishop	<ul style="list-style-type: none"> • Approve Compliance Management Policy. 	Every three years
	<ul style="list-style-type: none"> • Approve the Annual Diocesan Compliance Management Report 	Annually
	<ul style="list-style-type: none"> • Approve the Annual Agency Compliance Management Certificate. 	
Diocesan Finance Council & Diocesan Curia Leadership Group	<ul style="list-style-type: none"> • Review Compliance Management Policy. 	Every three years
	<ul style="list-style-type: none"> • Review the Annual Diocesan Compliance Management Report 	Annually
	<ul style="list-style-type: none"> • Review the Annual Agency Compliance Certificates 	
Agency Council	<ul style="list-style-type: none"> • Review the outcomes of audits and control reviews undertaken by the external provider. 	As required
	<ul style="list-style-type: none"> • Review and endorse Agency compliance management policies/systems/ processes. 	Every three Years
	<ul style="list-style-type: none"> • Review Annual Agency Compliance Management Certificate. 	Annually
Agency Senior Executives	<ul style="list-style-type: none"> • Implement policy/systems/ processes for their Agency/Division to effectively identify and manage compliance obligations. • Provide advice and communicate this Policy to all Agency staff and volunteers. • Receive reports of non-compliance and report all instances of serious non-compliance of this Policy to the Bishop. 	Ongoing
	<ul style="list-style-type: none"> • Prepare Annual Agency Compliance Management Certificate. 	Annually
Priests and Parish Administrators	<ul style="list-style-type: none"> • Advise the Parish staff and committees of this policy and its compliance. 	As required
	<ul style="list-style-type: none"> • Contribute to the Diocesan Compliance Obligation Register to best manage the compliance obligations of the Parish, with support from the Diocesan Office. 	Annually
Responsible Persons	<ul style="list-style-type: none"> • Person delegated by the Senior Executive to manage a particular compliance obligation and to ensure that it has been entered and maintained on the compliance register. • Provide guidance and support to all staff in meeting the obligation. • Assess risks associated with the compliance obligation and recommending necessary control measures to ensure that the obligation is met. • Report cases of non-compliance to the relevant Senior Executive. 	

Diocesan Governance, Risk and Compliance Coordinator	<ul style="list-style-type: none"> • Policy Manager for the Compliance Management Policy. • Advise all Agencies, Divisions and Parishes covered by this policy and its enacted date. 	Every three Years
	<ul style="list-style-type: none"> • Establish and maintain the Diocesan Compliance Obligation Register in conjunction with the delegated Responsible Persons. • Where required, facilitate Compliance Management training and provide support for Senior Executives and relevant personnel. 	Ongoing
	<ul style="list-style-type: none"> • Prepare the Annual Diocesan Compliance Management Report. 	Annually
	<ul style="list-style-type: none"> • Liaise with external providers on outcomes of audits and control reviews 	As required
Director, Professional Standards Office Queensland	<ul style="list-style-type: none"> • Responsible for addressing compliance obligation issues with regard to the Bishop. 	As required
External Review (external provider)	<ul style="list-style-type: none"> • Compliance management system health check, to determine the adequacy of nominated controls, and identification of non-compliance. • Deliver audits and control reviews where requested. 	As Required

SCHEDULE 3: COMPLIANCE MANAGEMENT KEY DOCUMENTATION

Diocesan Documents	Purpose	Responsibilities	Frequency
<ul style="list-style-type: none"> Compliance Management Policy & System 	Outlines the Diocese's commitment to manage risk, focusing on strategies to minimise risks in the delivery of its mission and objectives.	<u>Prepared</u> by DGRCC <u>Reviewed</u> through policy consultation process <u>Approved</u> by Bishop	3 yearly review
<ul style="list-style-type: none"> Diocesan Annual Compliance Management Report 	Report outlining the impact of actions from the previous year, and the Compliance Management Plan for the next year.	<u>Prepared</u> by DGRCC <u>Reviewed</u> by DCLG and DFC <u>Approved</u> by Bishop	Presented to DFC and DCLG annually
<ul style="list-style-type: none"> Diocesan Compliance Obligation Registers 	Registers of all compliance obligations, Responsible Persons and applicable compliance control measures.	<u>Identified</u> by Senior Executives <u>Collated</u> by DGRCC <u>Reviewed</u> by DCLG and DFC <u>Approved</u> by Bishop	Presented to DFC and DCLG annually

Agency/Division Documents	Purpose	Responsibilities	Frequency
<ul style="list-style-type: none"> Agency Compliance Management Policy/ System/ Process 	Process developed and implemented by Agencies, in alignment with the diocesan Compliance Management Policy .	<u>Prepared</u> by Agency Senior Executive <u>Reviewed</u> by Agency Council	3 yearly review
<ul style="list-style-type: none"> Annual Agency Compliance Management Certificate 	Templated certificate to provide assurance of Agency Compliance with key legislative compliance obligations.	<u>Prepared</u> by Agency Senior Executive <u>Reviewed</u> by Agency Council, DCLG and DFC <u>Approved</u> by Bishop	Presented to Agency Council, DFC & DCLG annually

SCHEDULE 4: COMPLIANCE MANAGEMENT TEMPLATES

S.4.1 Compliance Register Template

Name of Instrument and our Compliance Obligation	Responsible Person(s)	Current Compliance Controls Measures		Gaps
	Current Compliance Obligation Risk Rating ⇒		Additional Control Measures/ Actions (if required) ⇒	

S.4.2 Examples of Compliance Control Measures

IT Systems and Business Systems

- Implement new or improve current system

Business Processes

- Use Business Analyst to review current processes
- Robust recruitment
- Changes in practice
- Workload management
- Inclusion in position description
- Prioritization and goal setting
- EAP and employee support services
- Performance appraisal
- Performance management
- Upskilling staff/building competence
- Performance reporting
- Performance accountability

Audit & Review

- Internal Audit Program/activities to improve business processes (financial & non-financial)
- Investigations
- Researching and adopting best practice standards

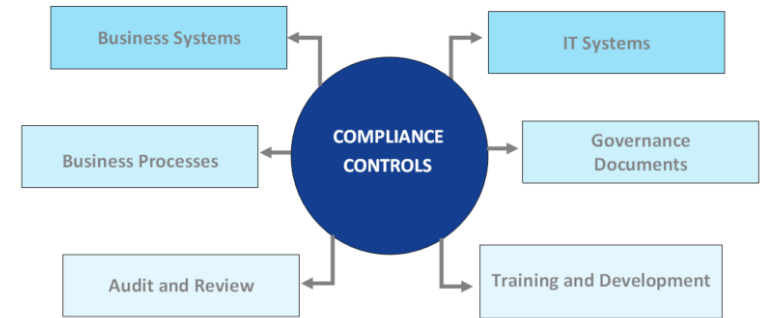
Training & Development

Governance Documents

- Directives to staff
- Ease of access to important information
- Delegation of responsibility/organisation structure
- Policies, Procedures, Guidelines
- Frameworks
- Strategic plans

Communication

- Offering feedback
- Communication planning
- Stakeholder liaison
- Meetings
- Establishing Working Groups
- Scenario planning
- Resource allocation
- Project management



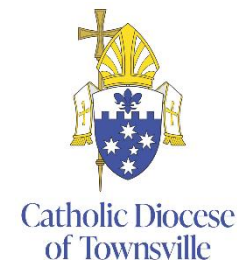
SCHEDULE 5: ANNUAL AGENCY/DIVISION COMPLIANCE CERTIFICATE

The Certificate will be prepared each year to coincide with the Agency's reporting of their Audited Financial Statements to the DFC. The Certificate will reflect the twelve-month period prior to the date of preparation of the Certificate.

Position:

Agency:

Period:



Acknowledgement of Purpose

- (a) I am aware that the attached Certification is given for the purpose of confirming compliance with the requirements of my position as <position> to the Bishop, in accordance with the *Catholic Diocese of Townsville Compliance Management Policy*.
- (b) I am aware that the following Certification may also be provided to: -
- i. the Agency Council;
 - ii. the Diocesan Finance Council; and
 - iii. the Auditors of the Diocese.

Certification: I certify that the following has been complied with in performing the role of <position> during the above period.

TOPIC	DESCRIPTION	EXCEPTIONS
1.0 Service Delivery & Funding	<p>1.1 Provided full accountability to government in meeting all the applicable compliance requirements of the various funding agreements.</p> <p>1.2 Where applicable, met all contractual requirements of alternate funding sources, including fees and donations.</p> <p>1.3 Established and maintained accreditation requirements necessary to secure funding for existing and new services.</p> <p>1.4 Maintained appropriate segregation of funding and services, including fundraising to maintain existing Public Beneficiary Institution (PBI) and/or charitable statuses.</p> <p>1.5 Implemented policy and structures to align government oversight or self-assessment in delivering services.</p> <p>1.6 Other <please specify></p>	

2.0 Financial Management	<p>2.1 That all financial requirements (in accordance with <i>Catholic Diocese of Townsville Financial Delegations and Governance Policies</i>) for <Agency> were presented to the Agency Council, DFC and Bishop.</p> <p>2.2 An external audit of <Agency> was performed and the audit reports were presented to the Agency Council, DFC and Bishop.</p> <p>2.3 Implemented strategies and operational practices which secure the financial viability of <Agency> including preparation and presentation of the annual budget.</p> <p>2.4 That <Agency> funds have been managed in an effective and efficient manner and within appropriate delegations, in accordance with the provisions of the diocesan <i>Financial Delegations Policy</i>.</p>	
3.0 Accounting	<p>3.1 That all applicable accounting standards are implemented consistently across <Agency>.</p> <p>3.2 Ensured compliance to all tax related issues including PAYG, GST, BAS, FBT, ACNC, salary sacrificing requirements and in particular the requirements associated with maintaining <Agency>PBI and/or charitable statuses.</p>	
4.0 Property & Building Services	<p>4.1 Understood and met canonical and diocesan policy requirements in relation to the administration of temporal goods.</p> <p>4.2 Complied with all property and building legislation/codes and contractual obligations.</p>	
5.0 Human Resource Management	<p>5.1 Employment law and training of personnel in relation to their obligations has been implemented in <Agency>.</p> <p>5.2 Policies/procedures which comply with relevant legislation have been put in place and communicated to personnel regarding:</p> <ul style="list-style-type: none"> • Modern awards and enterprise agreements • Employment contracts • Remuneration and working hours • Fair treatment in the workplace • Leave and flexible work arrangements • Terminating employment • Industrial action • Union right of entry • Record-keeping. 	

	<p>5.3 Implemented appropriate code of conduct management governance to manage expectations, breaches and reports in accordance with <Agency> regulatory obligations and the diocesan <i>Code of Conduct Policy</i>.</p> <p>5.4 Evaluated the performance of the senior management team.</p> <p>5.5 Optimised the activities of employees and resources with <Agency> objectives.</p>	
6.0 Compliance and Risk Management	<p>6.1 Implemented compliance management policy/systems/processes for <Agency> to effectively identify and meet all relevant regulatory, legal and insurance obligations.</p> <p>6.2 Implemented policy/systems/processes for <Agency> to effectively identify and manage the Risks that may affect the achievement of objectives and operational outcomes.</p> <p>6.3 As appropriate, provided Risk Management and Compliance Management training to key personnel within the Agency.</p> <p>6.4 <Agency> Risk Management and Compliance Management reporting has occurred, to the Agency Council, DFC and Bishop in accordance with the diocesan <i>Risk Management and Compliance Management Policies</i>.</p>	
7.0 Privacy	<p>7.1 Ensured practices are in place to comply with Privacy legislation across <Agency>.</p> <p>7.2 Complied with all provisions of the diocesan <i>Privacy Policy</i>, <u>OR</u></p> <p>7.3 Developed and implemented an Agency privacy policy (including the 13 Australian Privacy Principles).</p> <p>7.4 Provided appropriate training to Agency personnel.</p> <p>7.5 Responded appropriately to all privacy complaints received.</p>	
8.0 Protection of Children and Vulnerable Adults	<p>8.1 <Agency> complies with the Diocese and <Agency> policies and all relevant State and Commonwealth Legislation.</p> <p>8.2 All reports of breaches of guidelines are dealt with appropriately and in compliance with relevant legislation.</p> <p>8.3 The principles of natural justice and procedural fairness have been applied in dealing with any breaches of the guidelines.</p> <p>8.4 Submission of reports to appropriate external authorities as required in a timely manner.</p>	

9.0 Governance	<p>9.1 All relevant information/disclosures have been made to enable professional and informed advice to the Agency Council, DFC and Bishop.</p> <p>9.2 Prepared and issued regular reports, agendas and minutes to the Agency Council.</p> <p>9.3 Collaborated with <Agency> senior management team to develop strategic and operational plans.</p> <p>9.4 Presented strategic and operational plans for endorsement by the Agency Council.</p>	
10.0 Work Health & Safety	<p>10.1 Acquired and kept up-to-date knowledge of WHS matters, including obligations under the <i>Work Health and Safety Act 2011</i> (Qld), the <i>Work Health and Safety Regulation 2011</i> (Qld), Codes of Practice and Australian Standards.</p> <p>10.2 Ensured processes are present for compliance with duties and obligations under the applicable Legislation and Codes, and the diocesan <i>Work, Health and Safety Policy</i>.</p> <p>10.3 Provided appropriate training in WHS legislation and responsibilities to Agency personnel.</p> <p>10.4 Ensured appropriate resources, processes and reporting structures are in place to identify WHS hazards and eliminate/minimise WHS risks from work carried out as part of <Agency> operations.</p> <p>10.5 Ensured appropriate processes for receiving and considering information/reports regarding incidents, hazards and risks and responding in a timely way to that information.</p>	
11.0 Conflict of Interest & Complaints Management	<p>11.1 Implemented appropriate conflict of interest management governance to manage expectations, breaches and reports in accordance with <Agency> regulatory obligations and the diocesan <i>Code of Conduct Policy</i>.</p> <p>11.2 Implemented appropriate complaints management governance to manage expectations, breaches and reports in accordance with <Agency> regulatory obligations and the diocesan <i>Complaints Management Policy</i>.</p>	

Confirmation of Understanding and Completeness

For each statement contained in this Certification, I confirm in so far as it relates to my obligations as the <Position> of the <Agency>:

- (i) I have read and understood the Certification and am able to produce evidence to support the accuracy of the Certification as required;
- (ii) If a Certification is based on assumptions, evidence to support the reasonableness of the assumption(s) has been documented/recorded;
- (iii) Where I have not been able to verify a Certification in accordance with the steps set out above, I have disclosed this as an Exception;

I confirm that as at the date of this Certification, having regard to my role as <Position>, as far as I am aware all information provided in the Certification is true and correct in all respects and does not omit any material information. Where an exception or partial response has been provided, suitable commentary or exception reports have been provided.

Signed: _____

Date: _____

<Position> <Agency>

CERTIFICATION ACKNOWLEDGEMENT FROM BISHOP

I confirm that I have reviewed this Certification, and:

- ☐ any Exceptions identified in have been justified in a sufficient manner to meet the Diocese's compliance obligations and organisational standards; OR
- ☐ further information is required to ensure compliance with the Diocese's obligations and organisational standards (details below).

Signed: _____

Date: _____

Most Rev Timothy Harris DD

Bishop of Townsville