

APPENDIX

Part A – Background1. Characteristics1.1 History of the Organisation and Establishment

Past

i. When, how and why was the organisation founded?

The English Benedictine Congregation has its origins in the legislation of the Fourth Lateran Council of 1215 and the legislation of Pope Benedict XII of 1346. It was founded to reduce the dangers arising from excessive autonomy of individual Benedictine monasteries, by providing that the abbots should meet periodically and elect visitors, who would conduct a visitation (or inspection) of each monastery, to promote good practice. A congregation is described in Canon 488 of the 1917 Code of Canon Law as follows:

“A monastic congregation is a joining of several independent monasteries under the same superior.”

The Superior of the Congregation has no remit to authorise or control the activities undertaken at any monastery. Under both the 1917 code and the more recent 1983 Code, the Abbot President is the Superior of the Congregation. The Abbot President undertakes a four yearly visitation (that is, inspection) of each autonomous monastery. The formal purpose of the visitation is for the Abbot President to ensure that the Rule of St Benedict and the constitutions and law of the church are being observed. However he has no involvement in or authority over the life, prayer or work of the abbey. At a visitation, the Abbot President may issue a precept. The precept is binding in canon law and under the vow of obedience. The Abbot President has no power to remove any abbot. There is also a more informal purpose of the visitation, especially in modern times, namely to give encouragement and advice to the abbot and community.

At no time did the English Benedictine Congregation have any direct control over or responsibility for the constitution, management or operation of Fort Augustus Abbey. The Congregation did not govern the abbey.

- ii. What part did the provision in Scotland of residential care (including foster care) for children play in the organisation's purpose, operation and activities?

The provision of residential care in Scotland did not play a part in the English Benedictine Congregation's purpose, operation or activities.

- iii. When and how did the organisation become involved in the provision of residential care (including foster care) for children in Scotland?

The English Benedictine Congregation did not become involved in the provision of residential care for children in Scotland.

- iv. Why did the organisation consider that it had the competence to be responsible for, and manage the care of, children in establishments?

Not applicable.

- v. How many establishments did the organisation run, where were they located, over what period were they in operation, and what were their names?

Not applicable.

- vi. When, how and why was each of these establishments founded?

Not applicable.

- vii. In the case of any establishment which is no longer in operation, when and why did it cease operating?

Not applicable.

- viii. If the organisation itself is no longer involved in the provision of residential care for children in Scotland, when and why did it cease to be so involved?

Not applicable.

- ix. If the organisation was founded as a religious order by members of a particular faith or church, what was the precise relationship between the order and the religious hierarchy within that faith or church?

The English Benedictine Congregation was an Institute of Pontifical Right, which means that it was immediately subject to the jurisdiction of the Holy See as regards its internal affairs and the approval of its Constitutions. It was therefore not dependent on any Bishop or Bishops.

- x. Within the faith or church to which the religious order belonged, what degree of autonomy was enjoyed by the order in relation to the provision of residential care for children in Scotland?

Fort Augustus Abbey had complete autonomy in relation to the provision of residential care for children. The English Benedictine Congregation at no time had any control over, or responsibility for, the management or operation of the schools run by Fort Augustus Abbey.

- xi. In the case of establishments that were run by members of a religious order, what degree of autonomy within the order itself was enjoyed by such members?

Not applicable.

Present

- xii. With reference to the present position, are the answers to any of the above questions different?

No.

- xiii. If so, please give details.

Not applicable.

1.2 Funding of Establishment

Past

- i. How were the establishment's operations and activities, so far as relating to the provision of residential care for children, funded?

The English Benedictine Congregation did not run any establishments in the past, so the question is not applicable.

- ii. Was the funding adequate to properly care for the children?

Not applicable.

- iii. If not, why not?

Not applicable.

- iv. What state support did it receive?

Not applicable.

Present

- v. If the establishment continues to provide residential care for children, how is that funded?

Not applicable.

- vi. What state support does it receive?

Not applicable.

1.3 Legal Status

(a) Organisation

Past

- i. What was the legal status of the organisation since it was founded?

In the Canon Law of the Roman Catholic Church, the English Benedictine Congregation has been a juridical person since the seventeenth century. According to the law of Scotland, it would be an unincorporated association

- ii. Were there any changes in the legal status of the organisation since it was founded?

There were major revisions of the structures of the English Benedictine Congregation in the seventeenth century, following the Reformation and the confiscation of all the monasteries in England which belonged to the Congregation; and a further revision in 1899, which restored the traditional structure of the Congregation, as it had existed before the Reformation in England, as a union of autonomous monasteries; since 1930 there has been no change in the structure in Canon Law. There has been no change in the juridical structure according to the law of Scotland, except that in 1987 the property belonging to the Congregation, which had previously been held as the funds of an unincorporated association, was transferred to a Charitable Trust, registered in England and Wales.

- iii. What, if any, material changes were there to the legal status of the organisation?

Explained in the last sentence of the previous answer.

- iv. What was the legal basis which authorised or enabled the organisation to become responsible for the provision of residential care (including foster care) for children in Scotland?

Not applicable.

- v. Did that legal basis require the organisation to meet, or fulfil, any legal and/or regulatory requirements in respect of children in its care? If so, please give details.

Not applicable.

- vi. Did the organisation have a legal duty of care to each child in its care?

Not applicable.

Present

- vii. With reference to the present position, are the answers to any of the above questions different?

No.

- viii. If so, please give details.

Not applicable.

- ix. If the organisation is a Scottish local authority, please provide details of the predecessor authorities for the local authority area for which the authority is now responsible, and the time periods during which these authorities were the responsible authority for the area, or any part thereof.

Not applicable.

(b) Establishment

Past

- i. Did the establishment have a special legal, statutory or other status?

The English Benedictine Congregation did not run any establishments, so the question is not applicable.

- ii. If not, how was the establishment described?

Not applicable.

- iii. What was the legal basis which authorised, or enabled, the establishment to become responsible for managing the care of children in a residential setting?

Not applicable.

- iv. Did that legal basis require the establishment, or its management, to meet, or fulfil, any legal and/or regulatory requirements in respect of children in its care? If so, please give details.

Not applicable.

- v. Did the establishment have a legal duty of care to each child in its care?

Not applicable.

Present

- vi. With reference to the present position, are the answers to any of the above questions different?

No.

- vii. If so, please give details.

Not applicable.

1.4 Legal Responsibility

(a) Organisation

Past

- i. Did the organisation have any legal responsibility for the children in its care?

The English Benedictine Congregation did not become involved in the provision of residential care for children in Scotland, so the question is not applicable.

- ii. If so, what was the nature and extent of that legal responsibility?

Not applicable.

- iii. Did any other person or organisation have any legal responsibility for the children while they were in the organisation's care?

Not applicable.

- iv. If so, what was the nature and extent of that responsibility?

Not applicable.

- v. If the organisation had no legal responsibility for children in its care, where or with whom did legal responsibility lie?

Not applicable.

Present

- vi. With reference to the present position, are the answers to any of the above questions different?

No.

- vii. If so, please give details.

Not applicable.

(b) Establishment

Past

- i. Did the establishment, or those in charge of the establishment, have any separate legal responsibility (separate from the organisation) for children in its care?

The English Benedictine Congregation did not run any establishments in the past, so the question is not applicable.

- ii. If so, what was the nature of that responsibility?

Not applicable.

Present

- iii. With reference to the present position, are the answers to any of the above questions different?

No.

- iv. If so, please give details.

Not applicable.

1.5 Ethos

(a) Organisation

Past

- i. What did the organisation see as its function, ethos and/or mission in terms of the residential care service it provided for children?

The English Benedictine Congregation did not provide residential care for children in the past, so the question is not applicable.

- ii. If the establishment was run by a Catholic religious order, what vows were taken by members of the order and at which point in their training?

The members of the English Benedictine Congregation are the monasteries which constitute the Congregation, not the individual monks or nuns who are members of the monastery to which they belong; the question is therefore not applicable to the Congregation.

- iii. What did the organisation see as the establishment's function, ethos and/or mission in terms of the service that the establishment provided to children accommodated there?

The English Benedictine Congregation did not run any establishments in the past, so the question is not applicable.

- iv. Were there changes over time in terms of what the organisation saw as its function, ethos and/or mission in terms of the residential care service it provided for children?

Not applicable.

- v. If so, what were the changes and when and why did they come into effect?

Not applicable.

- vi. Were there changes over time in terms of what the organisation saw as the establishment's function, ethos and/or mission in terms of the service that the establishment provided to children accommodated there?

Not applicable.

- vii. If so, what were the changes and when and why did they come into effect?

Not applicable.

Present

- viii. With reference to the present position, are the answers to any of the above questions different?

No.

- ix. If so, please give details.

Not applicable.

(b) Establishment

Past

- i. What services were provided at the establishment, in terms of care for children?

The English Benedictine Congregation did not run any establishments, so the question is not applicable.

- ii. Did the establishment care for children of both sexes?

Not applicable.

- iii. If the establishment cared for children of one sex only, what was the thinking behind that policy?

Not applicable.

- iv. Were any special child care, or child protection measures, taken in the light of that policy? If so, please provide details.

Not applicable.

- v. What was the daily routine for boys/girls cared for at the establishment?

Not applicable.

- vi. What were the on-site activities for children cared for at the establishment?

Not applicable.

- vii. What were the off-site activities for them?

Not applicable.

- viii. Did children work manually, either at the establishment, or externally (e.g. farming work or other labour), or both?

Not applicable.

- ix. If the establishment was run by a Catholic religious order, were any prospective members of the order who were in training permitted to care for children?

Not applicable.

Present

- x. With reference to the present position, are the answers to any of the above questions different?

No.

- xi. If so, please give details.

Not applicable.

1.6 Numbers

(a) Organisation

Past

- i. How many children did the organisation accommodate at a time and in how many establishments?

The English Benedictine Congregation did not run any establishments, nor did it accommodate children, so the question is not applicable.

- ii. Please provide details of any material changes in numbers of children, or numbers of establishments, and the reasons for those changes?

Not applicable.

- iii. How many children in total were accommodated by the organisation?

Not applicable.

- iv. What numbers (if any) were placed in foster care by the organisation?

Not applicable.

- v. In general terms, was the main service provided by the organisation the provision of residential care for children in establishments, or was it the provision of foster care?

Not applicable.

Present

- vi. With reference to the present position, are the answers to any of the above questions different?

No.

- vii. If so, please give details.

Not applicable.

(b) Establishment

Past

- i. How many children did the establishment accommodate at a time?

The English Benedictine Congregation did not run any establishments, so the question is not applicable.

- ii. Did this change, and if so, what were the reasons?

Not applicable.

- iii. How many children in total were cared for at the establishment?

Not applicable.

- iv. What accommodation was provided for the children?

Not applicable.

- v. How many children occupied a bedroom/dormitory/house?

Not applicable.

Present

- vi. With reference to the present position, are the answers to any of the above questions different?

No.

- vii. If so, please give details.

Not applicable.

1.7 Children's Background/Experience

Past

- i. Did the children admitted to the establishment generally have a shared background and/or shared experiences?

The English Benedictine Congregation did not run any establishments, so the question is not applicable.

- ii. Were children admitted into the care of the organisation as a whole, or were they admitted into the care of a particular establishment?

Not applicable.

- iii. If children were admitted into the care of the organisation, did the organisation decide which establishment they would be admitted into?

Not applicable.

- iv. Who placed children with the organisation?

Not applicable.

- v. From 15 April 1971 (the date on which the Children's Hearing system was introduced), did the organisation/establishment receive children mainly from the Children's Hearing system?

Not applicable.

- vi. If not, how generally did children come to be admitted into the care of the organisation?

Not applicable.

- vii. Was there a gender or other admission policy or practice operated by the organisation or any establishment run by it?

Not applicable.

- viii. What was the policy/procedure and practice regarding admission of siblings?

Not applicable.

- ix. How long did children typically remain in the care of the organisation?

Not applicable.

- x. Were children moved between different establishments run by the organisation?

Not applicable.

- xi. If so, in what circumstances?

Not applicable.

- xii. Generally did children typically stay in one, or more than one, establishment?

Not applicable.

- xiii. What provision was made for contact between siblings while siblings were at the establishment?

Not applicable.

- xiv. What provision was made for contact between children and their parents and wider family while children were at the establishment?

Not applicable.

- xv. What provision was made for information sharing/updates about the children to their parents?

Not applicable.

- xvi. What provision was made for information sharing/updates about parents to their children?

Not applicable.

- xvii. What provision was made for the celebration of children's birthdays, Christmas and other special occasions?

Not applicable.

- xviii. What was the process for review of children's continued residence at the establishment, in terms of whether they continued to require to be there?

Not applicable.

- xix. When children left the care of the establishment, what was the process for discharge?

Not applicable.

- xx. What support was offered to children when they left the care of the establishment?

Not applicable.

- xxi. What information was sought by the organisation and/or establishment about what children leaving its care planned to go on to do?

Not applicable.

xxii. Was such information retained and updated?

Not applicable.

xxiii. What was provided in terms of after-care for children/young people once they left the establishment?

Not applicable.

Present

xxiv. With reference to the present position, are the answers to any of the above questions different?

No.

xxv. If so, please give details.

Not applicable.

1.8 Staff Background

(a) Organisation

Past

i. How many people were employed by the organisation who had some responsibility for residential care services for children?

The English Benedictine Congregation did not employ anyone who had any responsibility for residential care services for children.

ii. How many people were employed by the organisation at any one time who had some responsibility for residential care services for children?

Included in the previous answer.

iii. What experience/qualifications did such staff have?

Not applicable.

- iv. If the organisation is a religious order, how many members of the order had a responsibility for residential care services for children provided by the organisation in Scotland?

The English Benedictine Congregation did not provide residential care services for children in Scotland.

- v. What experience/qualifications did such members have, to equip them to discharge their responsibilities?

Not applicable.

Present

- vi. With reference to the present position, are the answers to any of the above questions different?

No.

- vii. If so, please give details.

Not applicable.

(b) Establishment

Past

- i. How many persons were employed in some capacity at the establishment?

The English Benedictine Congregation did not run any establishments in the past, so the question is not applicable.

- ii. How many of those persons had the opportunity of unaccompanied access to a child, or children, cared for at the establishment?

Not applicable.

- iii. How many were involved in the provision of care to children accommodated at the establishment (child care workers)?

Not applicable.

- iv. What experience and/or qualifications, if any, did the child care workers require to have?

Not applicable.

- v. What was the child care worker/child numbers ratio?

Not applicable.

- vi. What was the gender balance of the child care workers?

Not applicable.

- vii. Was any attempt made to employ child care workers in looking after children of the same sex as those workers?

Not applicable.

Present

- viii. With reference to the present position, are the answers to any of the above questions different?

No.

- ix. If so, please give details.

Not applicable.

2. Organisational Structure and Oversight

2.1 Governance

Past

- i. What were the governance arrangements within the organisation?

The English Benedictine Congregation was governed according to the Canon Law of the Catholic Church and the Constitutions approved by the Holy See. According to those Constitutions, the supreme authority, under the Holy See, belonged to the General Chapter, which normally met every four years. The General Chapter elected the Abbot President who was the superior of the Congregation, but whose authority was limited, as each of the monasteries was autonomous. The Abbot President was advised and assisted by his Council. The Abbot President and his Council were together known as the Regimen of the Congregation. The General Chapter also elected officials to assist the Abbot President in his functions.

- ii. How were the members of the governing body selected?

The Abbot President's Council until 1985 consisted of two Abbots, one selected by the Abbot President and one elected by the General Chapter. After 1985 it consisted of three Abbots, all elected by the General Chapter.

- iii. What qualifications and/or training, if any, did the members require to have in relation to the provision of residential care services for children?

The Abbot President and the members of his Council did not receive any training in relation to the provision of residential care services for children.

- iv. Did the members receive remuneration?

No.

- v. What was the nature of the accountability and oversight regime between the organisation's governing body and the establishment?

The English Benedictine Congregation did not run any establishments, so the question is not applicable

- vi. What visits were made by the governing body to the establishment?

Not applicable.

- vii. What was the purpose of such visits?

Not applicable.

- viii. How frequently did these happen?

Not applicable.

- ix. Were children interviewed, or spoken to, by members of the governing body during such visits?

Not applicable.

- x. If so, were establishment staff present while children were interviewed or spoken to?

Not applicable.

- xi. Were reports of such visits made and discussed by the governing body?

Not applicable.

- xii. Did visits result in changes to the organisation's policy, procedure and/or practice? If so, please give examples.

Not applicable.

Present

- xiii. With reference to the present position, are the answers to any of the above questions different?

No.

- xiv. If so, please give details.

Not applicable.

2.2 Culture

Past

- i. What was the nature of the culture within the organisation?

The purpose of the English Congregation was to support the monasteries which were members of the Congregation and to ensure that they followed the Rule of Saint Benedict, the Constitutions of the Congregation and the Canon Law of the Church.

- ii. Was that culture reflected in the organisation's policies, procedures and/or practice in relation the provision of residential care services for children?

The English Benedictine did not provide residential care services for children, so the question is not applicable.

- iii. How can that be demonstrated?

Not applicable.

- iv. Did the running of establishments reflect the organisation's culture, policies and procedures?

The English Benedictine Congregation did not run any establishments, so the question is not applicable.

- v. If not, please provide a representative range of examples and explain, by reference to those examples, why particular establishments were not, in material ways, run in accordance with the organisation's then culture, policies and procedures and what, if anything, was done to change that state of affairs?

Not applicable.

- vi. When and why did any changes in the culture of the organisation come about?

Since the 1960's, the emphasis of the English Benedictine Congregation's support of the monasteries shifted from an emphasis on correction of faults to one of encouragement of good practice.

- vii. Were any changes in culture driven by internal influences, incidents, experiences or events within the organisation, or any of the establishments run by the organisation?

Such changes in culture as happened were driven primarily by the change in culture in the Church as a whole at the time of the Second Vatican Council, but this also triggered a change in culture within the English Benedictine Congregation. Internal influences or incidents do not appear to have been relevant.

- viii. Were there any changes in culture that were driven by abuse, or alleged abuse, of children cared for at the establishment?

The English Benedictine Congregation did not run any establishments, so the question is not applicable.

- ix. If so, when did they occur and how did they manifest themselves?

Not applicable.

- x. Were any changes in culture driven by any external influences or factors and if so what were those influences or factors?

See the answer to n. vii; such changes in culture as happened were driven predominantly by the change in culture in the Church as a whole.

Present

- xi. With reference to the present position, are the answers to any of the above questions different?

Yes.

- xii. If so, please give details.

Since 2013 the English Benedictine Congregation has, with the agreement of the Holy See, changed its Constitutions to give the Abbot President a role in ensuring that monasteries comply with the safeguarding policies approved by both the ecclesiastical and civil authorities (see the Constitutions, n. 36A).

- xiii. To what extent, if any, has abuse or alleged abuse of children cared for at any establishments caused, or contributed to, the adoption of the current policies, procedures and/or practices of the organisation, in relation to the provision of residential care services for children including the safeguarding and child protection arrangements applying to its current establishments?

Abuse of children cared for at establishments run by monasteries of the English Benedictine Congregation has been the most significant factor in the adoption of the changes in the Constitutions described above.

2.3 Leadership

Past

- i. How was the establishment managed and led?

The English Benedictine Congregation did not run any establishments, so the question is not applicable.

- ii. What were the names and qualifications of the persons in charge of the establishment? Please include the dates for when each of the persons was in charge.

Not applicable.

- iii. What was the oversight and supervision arrangements by senior management within the establishment?

Not applicable.

- iv. What were the oversight arrangements by the organisation, including visits by or on behalf of the organisation?

Not applicable.

Present

- v. With reference to the present position, are the answers to any of the above questions different?

No.

- vi. If so, please give details

Not applicable.

2.4 Structure

Past

- i. What was the structure of the organisation?

We refer to answer 2.1

- ii. What was the structure of the establishment?

The English Benedictine Congregation did not run any establishments in the past, so the question is not applicable.

Present

- iii. With reference to the present position, is the answer to the above question different?

Yes.

- iv. If so, please give details.

The structure is the unaltered, but in the present there is no autonomous monastery of the English Benedictine Congregation located in Scotland.

2.5 Hierarchy and Control

Past

- i. What was the hierarchy within the organisation?

This question has already been answered substantially in 2.1. It should be added that the authority of the Abbot President and his Council is limited by the Canon Law of the Church and the Constitutions of the Congregation, so that it is the Abbot of each autonomous monastery, who exercises authority within his monastery.

- ii. What was the structure of responsibility within the organisation?

The Abbots of the autonomous monasteries exercise responsibility for his monastery and any establishment run by that monastery. The Abbot President had responsibility for ensuring that Abbots ran their monasteries in accordance with the Rule of Saint Benedict, the Constitutions of the English Benedictine Congregation and the Canon Law of the Church.

- iii. What were the lines of accountability?

The Abbot President was accountable to the General Chapter of the Congregation and ultimately to the Holy See.

- iv. Within the organisation, who had senior management/corporate/organisational responsibility for the managers/management teams/leadership teams who managed the establishment on a day-to-day basis?

The English Benedictine Congregation did not run any establishments, so the question is not applicable.

- v. What were the reporting arrangements between the establishment and the organisation?

Not applicable.

- vi. Within the establishment itself, who had managerial responsibility for, or was in overall charge of, those employed there, including in particular those who were involved in the day-to-day care of children, and any other persons who had contact with the children?

Not applicable.

- vii. To whom were child care workers within the establishment directly responsible?

Not applicable.

- viii. Who, within the organisation, took decisions on matters of policy, procedure and/or practice in relation to the establishment?

Not applicable.

- ix. Who, within the organisation, was responsible for the implementation of, and compliance with, the organisation's policies, procedures and/or practices at the establishment?

Not applicable.

Present

- x. With reference to the present position, are the answers to any of the above questions different?

No.

- xi. If so, please give details.

Not applicable.

2.6 External Oversight

Past

- i. What were the arrangements for external oversight of the organisation and the establishment?

The Holy See was responsible for external oversight of the organisation. The English Benedictine Congregation did not run any establishments, so that part of the question is not applicable.

- ii. Who visited the organisation and/or the establishment in an official or statutory capacity and for what purpose?

The normal way in which the Holy See would visit the organisation would be through an Apostolic Visitation. The English Benedictine Congregation did not run any establishments, so that part of the question is not applicable.

- iii. How often did this occur?

An Apostolic Visitation would occur if special circumstances demanded one. During the period 1930 to 2014, the Holy See never conducted an Apostolic Visitation of the English Benedictine Congregation.

- iv. What did these visits involve in practice?

An Apostolic Visitation involved the Holy See appointing a Visitor who would come and investigate the situation and report back to the Holy See, which would then make any decisions it believed appropriate.

- v. What involvement did local authorities have with the organisation and/or the establishment in respect of residential care services for children?

The English Benedictine Congregation did not operate residential care services for children, so the question is not applicable.

- vi. What involvement did local authorities have with the organisation and the establishment in respect of the children at the establishment?

The English Benedictine Congregation did not run any establishments in the past, so the question is not applicable.

- vii. If the establishment was run by a Catholic religious order, what actual involvement and/or responsibility, whether formal or informal, did the Catholic Hierarchy/Bishops' Conference have, either directly or at diocesan level, in the creation, governance, management and/or oversight of the establishment?

Not applicable.

- viii. What was the nature and extent of any pastoral care provided to the establishment, if it was run by a religious order?

Not applicable.

Present

- ix. With reference to the present position, are the answers to any of the above questions different?

No.

- x. If so, please give details.

Not applicable.

Part B – Current Statement

3. Retrospective Acknowledgement/Admission

3.1 Acknowledgement of Abuse

- i. Does the organisation/establishment accept that between 1930 and 17 December 2014 some children cared for at the establishment were abused?

The English Benedictine Congregation did not run any establishments between 1930 and 17 December 2014, so the question is not applicable.

- ii. What is the organisation/establishment's assessment of the extent and scale of such abuse?

Not applicable.

- iii. What is the basis of that assessment?

Not applicable.

3.2 Acknowledgement of Systemic Failures

- i. Does the organisation/establishment accept that its systems failed to protect children cared for at the establishment between 1930 and 17 December 2014 from abuse?

The English Benedictine Congregation did not run any establishments between 1930 and 17 December 2014, so the question is not applicable.

- ii. What is the organisation/establishment's assessment of the extent of such systemic failures?

Not applicable.

- iii. What is the basis of that assessment?

Not applicable.

- iv. What is the organisation/establishment's explanation for such failures?

Not applicable.

3.3 Acknowledgement of Failures/Deficiencies in Response

- i. Does the organisation/establishment accept that there were failures and/or deficiencies in its response to abuse, and allegations of abuse, of children cared for at the establishment between 1930 and 17 December 2014?

The English Benedictine Congregation did not run any establishments between 1930 and 17 December 2014, so the question is not applicable.

- ii. What is the organisation/establishment's assessment of the extent of such failures in its response?

Not applicable.

- iii. What is the basis of that assessment?

Not applicable.

- iv. What is the organisation's explanation for such failures/deficiencies?

Not applicable.

3.4 Changes

- i. To what extent has the organisation/establishment implemented changes to its policies/procedures and practices as a result of its acknowledgment in relation to 3.1 – 3.3 above?

Not applicable.