

Holy Faith Sisters - Irish Region



SAFEGUARDING CHILDREN POLICY 2014

ADOPTED AND ISSUED

ON

22nd OCTOBER, 2014

Holy Faith Sisters - Irish Region



SAFEGUARDING CHILDREN POLICY 2014 ADOPTED AND ISSUED ON 22nd OCTOBER, 2014

Ratification: This Policy was ratified, adopted and issued by the Irish Region on 22nd October 2014. This Policy will be reviewed by the Region Leadership Team at least every 3 years, and more regularly if required (eg. where there are changes in the legislation, or in the structures of the Holy Faith Sisters) using the NBSCCCI checklist (see Appendix 5).

Implementation: A review of the implementation of this Policy will take place each year as part of the annual Regional leadership team's review. The review mechanism will include the completion of an annual checklist by the DLP (see Appendix 5). During regular visitation by the regional team members and or the regional leader a follow up conversation will be held with each Congregation/cluster.

Promulgation: Each member of our Congregation, employee and volunteer shall be familiar with and adhere to this Policy. The name and contact details of the Designated Liaison Person and the Deputy Designated Liaison Person shall be clearly displayed at the entrance/foyer/reception of each Congregational residence/property, together with a copy of the Policy Statement.

Signed: *Sr. Rosaleen Cunniffe*
Sr. Rosaleen Cunniffe, Regional Leader

Signed: *Sr. Aileen Tierney*
Sr. Aileen Tierney

Signed: *Sr. Brenda Maddock*
Sr. Brenda Maddock

Signed: *M. A. Ferguson*
Sr. Maureen Ferguson, Regional Designated Liaison Person

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Holy Faith Sisters - Irish Region



SAFEGUARDING CHILDREN POLICY STATEMENT 2014

The Holy Faith Sisters are committed to the Gospel values that cherish and safeguard children, as well as protecting them from physical, sexual and emotional harm or neglect.

“Let the children come to me; do not stop them.” [Mt. 19:14]

We endeavour to do this by:

- ❖ Circulating our Policy and Procedures to Holy Faith Communities and Ministries where Sisters, Staff and Volunteers work.
- ❖ Raising awareness of this important area, especially among all those who work directly with children, regarding the values we hold in safeguarding children, advice and training in safe management practices and the importance of familiarising all those who work within Holy Faith communities/ministries with our policy and procedures.

Each Holy Faith Congregation/ministry in the Irish Region:

- ❖ Recognises that Holy Faith Sisters and all those in Holy Faith ministries have a special duty to provide a safe environment that fosters the dignity of children and young people as children of God and respects their personal integrity and human rights.
- ❖ Recognises that the welfare of children and young people is of paramount importance and promotes their wellbeing.
- ❖ Responds in accordance with the Safeguarding Children Standards and Policies to any reported concern, suspicion, disclosure and/or complaint about the safety of children and young people in the context of Holy Faith related ministries/activities.

Conscious of its responsibility to prevent the sexual, physical and emotional abuse of children and their neglect, the Holy Faith Sisters undertake to fully report all concerns, suspicions, allegations, and disclosures (current or historical or anonymous) made to them of such child abuse to the Civil authorities and Church authorities without delay. All suspicions, concerns, disclosures (current or historical or anonymous) and/or complaints of abuse pertaining to members of the Holy Faith Congregation, staff or volunteers, should be made to the Designated Liaison Person who will work in conjunction with TUSLA and the Gardaí.

Anyone making an allegation of abuse will be received with respect and listened to, will be informed of actions taken as a result of their disclosure and will have their need for counseling met, if required.

Note to parents/guardians/carers: you are welcome and encouraged to provide the Holy Faith Sisters with your views and feedback on the Holy Faith Sisters policies and procedures on keeping children safe.

Sr. Maureen Ferguson, Regional Designated Liaison Person (ph: 01 414 1916)

Sr. Barbara Perry, Regional Deputy Designated Liaison Person (ph: 01 287 4229)

Sr. Rosaleen Cunniffe, Regional Leader (ph: 01 857 2100)

IMPORTANT CONTACT DETAILS

Congregational Contact Details

Regional Designated Liaison Person:

Sr. Maureen Ferguson (Ph. 01 414 1916)

Regional Deputy Designated Person:

Sr. Barbara Perry (Ph. 01 287 4229)

Regional Authorised Signatory for Garda Vetting:

Sr. Aideen Tierney (Ph. 01 857 2100)

Regional Leader:

Sr. Rosaleen Cunniffe (Ph. 01 857 2100)

Police Contact Details

An Garda Siochána

- Dublin - Domestic Violence & Sexual Assault Unit (Ph. 01 666 3435)
- Contact your local Garda station. See a list of Garda Stations on the Garda website (<http://www.garda.ie/Stations/Default.aspx>)

PSNI (Ph. 0845 600 8000)

Social Services Contact Details

Tusla (TUSLA) Local Tusla Contacts for Child Protection and Welfare Services are set out overleaf.

Contact your local Congregation Care Area. For information call 1850 241 850

Department of Health, Social Services and Public Safety (DHSSPS)

Castle Buildings, Stormont, Belfast BT4 3SJ (Ph. 028 905 20500)

Email. webmaster@dhsspsni.gov.uk

National Board for Safeguarding Children in the Catholic Church in Ireland

Specialist advice about child protection issues can be accessed through the National Office.

National Safeguarding Children Office (Ph. 01 505 3124) www.safeguarding.ie

Director: Ms. Teresa Devlin (Ph. 01 505 3018)

Counselling Services

Towards Healing Helpline

www.towardshealing.ie

From the Republic of Ireland (Ph. 1800 303 416)

From Northern Ireland (Ph. 0800 0963315)

One in Four (Ph. 01 662 4070)

www.oneinfour.ie

The Samaritans (Ph. 116 123)

Samaritans provides confidential non-judgemental emotional support, 24 hours a day for people who are experiencing feelings of distress or despair.

Irish Society for the Prevention of Cruelty to Children (ISPCC) (Ph. 116 000)

29 Lower Baggot Street, Dublin 2

Childline (Ph. 1800 666 666)

Provides a 24 hour listening service for all children up to the age of 18

Catholic Youth Care (Ph. 01 872 5055)

Arran Quay, Dublin 7

www.cyc.ie



Area Management Structures, Contacts and Addresses



- Dublin Mid Leinster
- Dublin North East
- South
- West

West

Service Director

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Area Managers

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Service Director

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Jim Gibson

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Dublin North East

Service Director

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Dublin Mid Leinster

Service Director

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Maria Larkin

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Mullingar
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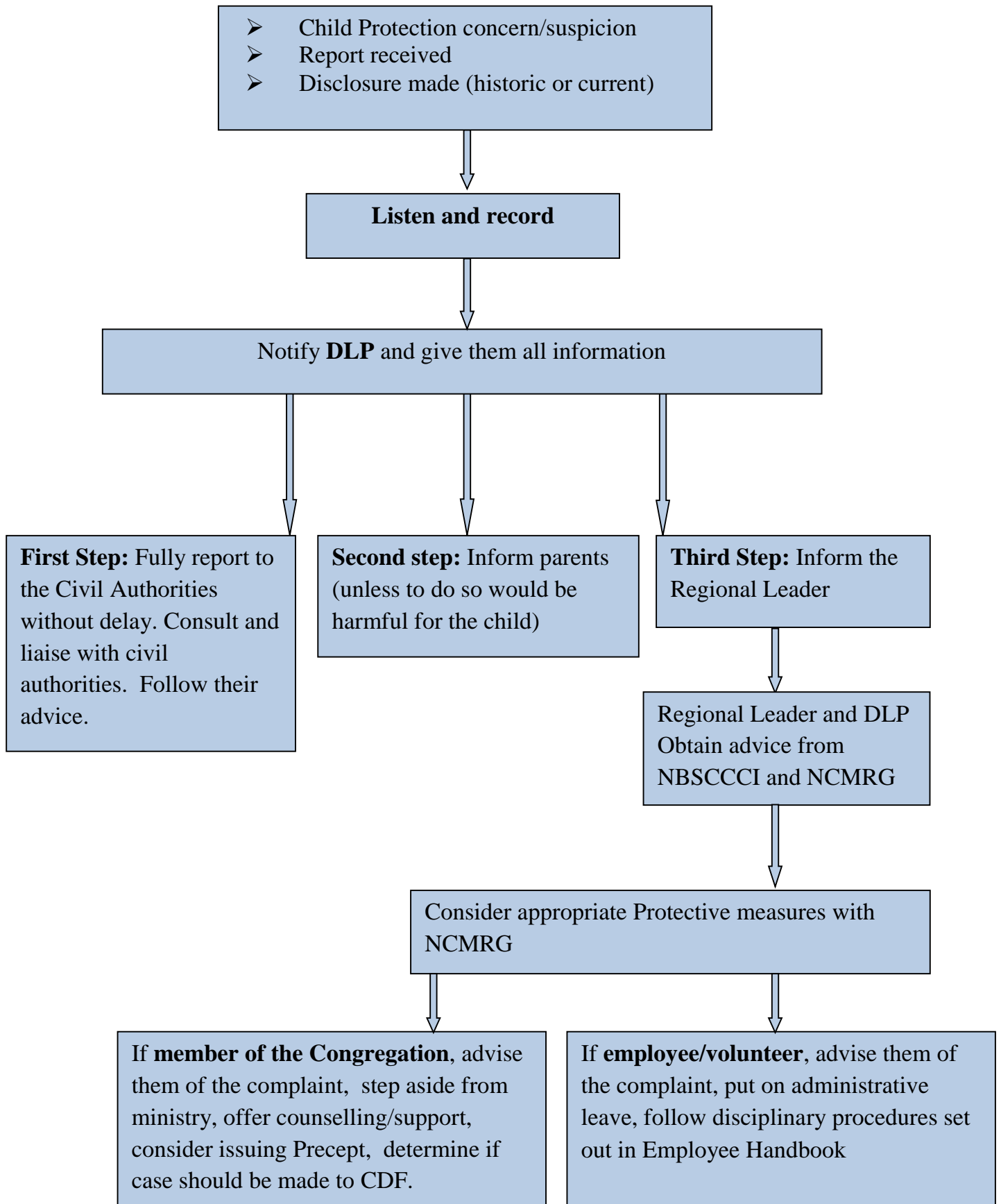
DEFINITIONS

In this Policy, the following terms shall have the following meanings:

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| “Abuser” or “Respondent” | Means someone who has been alleged to pose a risk to children or young people. While it mostly refers to sexual abuse, the terms cover all forms of deliberate harm to children. Offender describes someone who has been convicted and found guilty of a criminal offence. |
| “Advisor” | Means person appointed to offer support to a person who has had an allegation, concern, suspicion, report and/or disclosure raised against them. |
| “CDF” | Means the Congregation of the Doctrine of the Faith. |
| “child” | Means a person under the age of 18 years old, other than a person who is or has been married (definition taken from Child Care Act 1991) |
| “child abuse” | Means child abuse as defined in <i>Children First</i> (as more particularly detailed in Appendix 1 of this Policy). |
| “Children First” | Means the National Guidance for the Protection and Welfare of Children published by the Department of Children and Youth Affairs 2011. |
| “civil authorities” | Means in the Republic of Ireland, TUSLA and/or An Garda Síochána, and in Northern Ireland, the Department of Health, Social Services and Public Safety and/or PSNI. |
| “complaint” | Means a report or account of actual or suspected abuse or inappropriate behaviour. |
| “Congregation” | Means the Irish Region of the Holy Faith Sisters and each and every member of the Congregation. |
| “DLP” | Means the Regional Designated Liaison Person. |
| “Deputy DLP” | Means the Regional Deputy Designated Liaison Person. |
| “disclosure” | Means a report of child abuse by one person to another person (either current or historical or anonymous) either from the victim, from a third party, or from an anonymous source. |
| “DHSSPS” | Means the Department of Health, Social Services and Public Safety (Northern Irish Executive). |
| “employee” | Means anyone employed by the Congregation (paid or unpaid, full-time or part-time) including volunteers. |
| “grooming” | Grooming and targeting are words used to describe the way sex offenders deliberately select and establish a relationship of trust which they then manipulate to exercise power over the victim (their family, the organisation or professional setting). |
| “learning difficulty” | Learning difficulty is a term used to describe any one of a number of barriers to learning that a child may experience. Children with learning difficulties may find activities that involve thinking and understanding particularly difficult, and many need support in their everyday lives as well as at school. Learning difficulty is a broad term that covers a wide range of needs and problems, including dyslexia and behavioural problems, and the full range of ability. Learning disability: people who have a learning disability have difficulties learning and find it particularly hard to understand new and complex information, and to develop new skills. A learning disability is a lifelong condition that is usually present from birth, although it may not become apparent until a child fails to reach particular developmental milestones. |
| “NBSCCCI” | Means the National Board for Safeguarding Children in the Catholic Church in Ireland. |

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| “NCMRG” | Means the National Case Management Review Group established by the NBSCCCI. |
| “parent” | Means all parents, guardians, foster-parents, carers and/or persons in loco parentis and/or anyone with parental responsibility or who undertakes day-to-day care for a child. It may include step-parents or grandparents or other members of the family. |
| “PSNI” | Means the Police Service of Northern Ireland. |
| “report” | Means a report, allegation, suspicion, concern, historical disclosure, third party disclosure, anonymous disclosure, relating to child abuse. |
| “Signs and Symptoms of Child Abuse” | Means the signs and symptoms of child abuse as set out in Children First, as more particularly defined in Appendix 2 of this Policy. |
| “SRF”: | Means the Standard Reporting Form for reporting child protection and/or welfare concerns to TUSLA. See Appendix 3 of this Policy. |
| “Support Person” | Means the person appointed to support anyone making an allegation or disclosure, or raising a concern about actual or suspected abuse. |
| “Tusla” | Means the Child and Family Agency established under the Child and Family Agency Act 2013. |
| “volunteer” | Means ‘anyone who gives their time in a position in a non-profit organisation, free of charge, doing something for the good of the Congregation or a voluntary group (for which they may get travelling and other out-of-pocket expenses) and which is not for their own benefit or for the benefit of a close relative’(definition taken from Access NI, 2008) |
| “vulnerable person” | Means a person aged 18 or older who by reason of mental or other disability, age or illness, or who may be unable to take care of him or herself against ‘significant harm’ or ‘exploitation’. The term vulnerable adult may include a person with a learning disability; a physical disability; a sensory impairment; impaired mental health; dementia; acquired brain injury; a drug or alcohol problem; certain types of physical illness; or a person who is who is frail due to age or other factors. |

SUMMARY/QUICK GUIDE



SECTION 1

Standard 1: A written Policy on Keeping Children Safe

Summary of this section: how we developed our Policy

The Holy Faith Sisters of the Irish Region have adopted a comprehensive set of Safeguarding Children policies and procedures which are reflected in this Policy document. This document has as its paramount and over-riding concern the safety and welfare of all children who are involved in any way in the ministries and activities of Holy Faith Sisters of the Irish Region. This document includes procedures for best practice for the prevention of child abuse and for an appropriate response where abuse is alleged, disclosed, suspected, or where concerns arise. In developing these procedures, we aim to create a secure and supportive atmosphere in which those who have suffered abuse in the past can be assured of a sensitive, pastoral, caring and compassionate response, and should be offered appropriate pastoral care for them and their family. The procedures set out in this Policy are also concerned with ensuring that the rights in natural justice of a person who is accused of abuse are respected, and that appropriate pastoral care, counselling and support is provided for them and their family. Holy Faith Sisters and those who work with them in Holy Faith Ministries and activities seek to inspire and empower people to find God in their daily lives. Respect for the dignity and integrity of every person is a fundamental principle of all personnel in the Holy Faith Organisation. A particular requirement of this principle is the recognition of the right of all children to be respected, nurtured, cared for and protected. This right is embedded in Gospel values, in international law and in domestic law.

- 1.1. This Policy has been devised to direct Holy Faith Sisters and personnel engaged in Holy Faith ministries on the safeguarding of children, young people and vulnerable adults with whom they interact. It is written in a clear and easily understandable way to ensure that it is user-friendly and accessible.
- 1.2. This Policy has been signed and adopted by the Irish Regional Leader, the DLP and the Deputy DLP. It was adopted on 22nd October, 2014.
- 1.3. This policy applies to all Holy Faith Sisters and our employees and volunteers **EXCEPT WHERE** the suspicion, concern, disclosure and/or complaint is received by that member of the Congregation/employee/volunteer during the course of their employment/ministry in circumstances where they are legally and contractually obliged to adhere to Government Department Child Protection Guidelines (including but not limited to those engaged in ministries in primary and post primary schools in which case they are required by law and by their employment contract to follow and adhere to the Department of Education and Skills Child Protection Procedures for Primary and Post-Primary Schools). In all other cases, this Policy shall apply.
- 1.4. This Policy will be reviewed by the Regional Leader and the DLP every 3 years or more regularly if required (eg. where there are changes in the legislation, or in the structures of the Holy Faith Sisters).
- 1.5. Save for where Government Department Child Protection Guidelines apply (eg. Department of Education and Skills Child Protection Procedures for Primary and Post-Primary Schools) this Policy applies to all the aspects of the Congregation's ministries, eg activities in Congregational properties, Congregation work, pilgrimages, trips and holidays.

- 1.6. This Policy states how those individual who post a risk to children are to be managed. See Appendix 7 in relation to the steps to be taken when a concern, suspicion, report or disclosure (current, historical, or anonymous) is made against a Holy Faith Sister, and see Appendix 8 in relation to the steps to be taken when a concern, suspicion, report or disclosure (current, historical, or anonymous) is made against an employee or volunteer.
- 1.7. This Policy utilises the definition of “child abuse” taken from *Children First 2011*. See Appendix 1 for the full extract from *Children First 2011* relating to the definition of “child abuse”. The Policy and Procedures outlined herein are based on the principles and guidance set out in: *Safeguarding Children: Standards and Guidance Document for The Catholic Church in Ireland* (2009). This guidance is, in turn, based on the civil guidelines of the two jurisdictions on the Island of Ireland. Our Policy has been updated to take account of the national guidance set out in *Children First 2011*, and with the HSE guidance document “Child Protection and Welfare Practice” Handbook 2011.
- 1.8. All concerns, suspicions, allegations and disclosures (current or historical or anonymous) shall be fully reported to the civil authorities without delay. See page 6 for a “Summary/Quick Guide”, and Section 2 for further details.
- 1.9. We apply the seven standards and guidance from the national document ‘Safeguarding Children’.

SECTION 2

Standard 2: Procedures – how to respond to child protection concerns, suspicions, allegations and disclosures

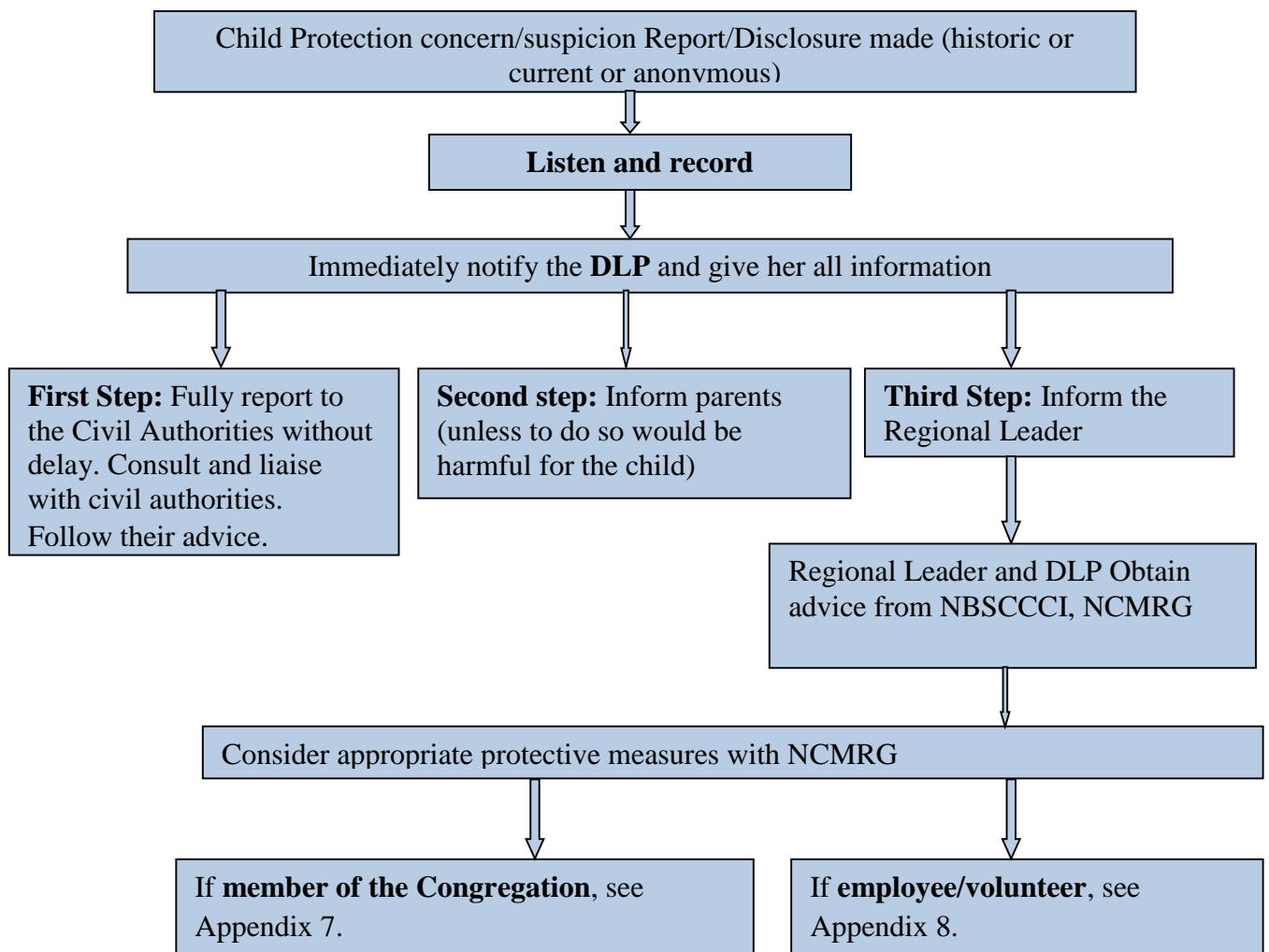
Within the Holy Faith Sisters, we have a clear, step-by-step procedure on what action to take where child protection concerns, suspicions, allegations and disclosures (current or historical or anonymous) arise. These are consistent with legislation on child welfare, civil guidance (and in particular Children First 2011 and the HSE guidance document “Child Protection and Welfare Practice Handbook” 2011. These step by step procedures are written in a clear, easily understandable way.

Step by Step Procedure:

This procedure shall be followed where there are any child protection concerns, suspicions, allegations and disclosures (current or historical or anonymous) regarding Holy Faith Sisters, employees and/or volunteers and/or regarding any other person not associated with the Holy Faith Sisters:

- 2.1 Where abuse is observed, suspected or disclosed the one thing you must not do is nothing.
- 2.2 For the members of our Congregation, doing nothing will be treated as a most serious matter.
- 2.3 For our employees and volunteers, doing nothing will be treated as gross misconduct and will be dealt with under the relevant Disciplinary Procedures in force in the workplace, and could result in immediate dismissal. In addition, any failure to follow the steps outlined in this Policy may be a criminal offence.
- 2.4 All members of the Congregation, employees and volunteers are trained to be vigilant for signs of child abuse even where they are not disclosed. For example: if a child appears malnourished, child neglect may be suspected. Where a child has injuries, physical abuse may be suspected.
- 2.5 When any member of the Congregation, employee and/or volunteer observes child abuse, suspects child abuse, and/or receives a disclosure of child abuse (including a historical disclosure, an anonymous disclosure, or a disclosure from a third party other than the victim) it is their duty to immediately notify the DLP.
- 2.6 Where a person reveals that he or she has abused a child, it is necessary to tell that person that you cannot keep such information secret, even if it relates to an incident many years previously. You must inform the person that you are required to refer the information to DLP, who will follow the procedures for referral to the civil authorities.
- 2.7 Allegations or concerns about child abuse that are raised by a person who wishes to remain anonymous are to be treated carefully. Anxiety or fear may cause some people not to reveal their identity immediately. It is difficult to act on information unless at some point the name of the person raising a concern or making an allegation becomes known. The person raising the concern should be informed that anonymity will restrict the ability of professionals to access information and/or to intervene to protect a child. As much openness as possible should be encouraged.
- 2.8 Guidance on how to respond to a child or person who makes a disclosure is set out at Appendix 12.
- 2.9 Each member of the Congregation, every employee and volunteer is obliged to familiarise themselves with the guidance set out at Appendix 12 and shall respond sensitively and appropriately to people raising a child protection concern.
- 2.10 These obligations apply in relation to all children who come into contact with the Congregation or its employees and/or volunteers or about whom they receive information (including unknown or unidentified children) which raises concerns about their safety or welfare.

- 2.11 The obligations imposed in this Policy shall apply to each and every member of the Congregation, its employees and/or volunteers **SAVE AND EXCEPT WHERE** the suspicion, concern, disclosure and/or complaint is received by that member of the Congregation/employee/volunteer during the course of their employment/ministry in circumstances where they are legally and contractually obliged to adhere to Government Department Child Protection Guidelines (including but not limited to those engaged in ministries in primary and post primary schools in which case they are required by law and by their employment contract to follow and adhere to the Department of Education and Skills Child Protection Procedures for Primary and Post-Primary Schools). In all other cases, this Policy shall apply.
- 2.12 Temporary work in another organisation: Holy Faith Sisters, or an employee or volunteer with a Holy Faith ministry who is working on a temporary basis in another organisation (on a placement, for example) and who in the course of that work encounters a disclosure, allegation or suspicion of child abuse must report the matter to the DLP of that organisation. In addition, the person must report to the DLP of the Holy Faith Sisters the fact that he or she had encountered a child protection concern in the organisation in which he or she was temporarily working and that it had been reported to the DLP of that organisation.
- 2.13 It is the duty of each member of the Congregation, every employee and volunteer to ensure that any concerns, suspicions, allegations or disclosures (historical, current or anonymous) are reported immediately in compliance with the terms of this Policy.
- 2.14 The following flow-chart **summarises** the steps in the child protection reporting process.



- 2.15 The procedures set out below **detail** the action that must be taken by a member of the Congregation, an employee or a volunteer if any report, concern, allegation, suspicion, complaint or disclosure (historical, third party, or anonymous) is received relating to child abuse.
- 2.16 The safety of the child is always the most important consideration.
- 2.17 If you observe child abuse, intervene immediately. A child should not be left in a situation of risk. “Child abuse” means child abuse as defined in *Children First 2011* (see Appendix 1 of this Policy).
- 2.18 Where a child protection concern arises about a child or a complaint is made about the behaviour of a member/employee/volunteer/any other person, or where a report is received, or where a disclosure is made (including a historical disclosure or a disclosure made by a third party) the information is immediately passed onto the DLP (or the Deputy DLP in her absence).
- 2.19 The Holy Faith Sisters have appointed a DLP and a Deputy DLP. Their contact details are set out on Page 1, and everyone in the Congregation knows who they are and how to contact them. The DLP and Deputy DLP have a clearly defined role and responsibilities for safeguarding children. See Appendix 9 which sets out the full detail of the role and responsibilities of the Holy Faith Sisters DLP and Deputy DLP. They receive regular training, and support.
- 2.20 The work of the DLP and Deputy DLP shall be supported by the Local Safeguarding Representative. The role and responsibilities of the Local Safeguarding Representative are detailed in Appendix 9.
- 2.21 In **all cases** the child protection concern must be reported to the civil authorities by the DLP without delay.
- 2.22 In cases where a complaint/report/concern/disclosure/suspicion relating to a concern about a child has been received, but the DLP is not sure whether to make a report to the civil authorities, the DLP should seek appropriate advice. The Regional DLP may consult TUSLA, An Garda Síochána, and/or the NBSCCCI, on the appropriate steps to be taken. The DLP must keep a written record of the consultation with Tusla/An Garda Síochána/NBSCCCI on the Child Protection Case File. Decisions not to refer a matter must always be in consultation with TUSLA, An Garda Síochána and the NBSCCCI. Where the DLP decides not to make a report to the civil authorities, she must immediately inform the Regional Leader in writing of this decision and outlining her reasons therefor.
- 2.23 When recording the details of a complaint/concern/suspicion/report/disclosure (current, historical and/or anonymous) the Reporting Form set out at **Appendix 3** should be used.
- 2.24 When making a report to TUSLA, the DLP shall use the SRF as required by TUSLA (see **Appendix 4**).
- 2.25 Where the DLP (or any other member of the Congregation, or employee or volunteer) has reason to believe that the child may be in immediate danger from child abuse and the Local Duty Social Worker/TUSLA cannot be contacted, the Gardai must be contacted immediately. **A child must not be left in a situation of risk.**
- 2.26 Where the concern relates to an offence against a child which falls under the mandatory reporting provisions set out in the Criminal Justice (Withholding of Information on Offences Against Children and Vulnerable Persons) Act 2012, a report must also be made to An Garda Síochána regardless of whether TUSLA has already been informed. For more detail on the offences covered by the mandatory reporting provisions, see Appendix 6.
- 2.27 In the report made to Tusla/An Garda Síochána, the statutory authority should be asked in writing to confirm in writing that they have received the report and are acting upon the allegations/concerns referred to therein.
- 2.28 Parents/Guardians must be informed that a referral has been made, except when to do so would be dangerous for the child.

- 2.29 The DLP shall immediately inform the Regional Leader of all concerns, allegation, suspicions, and disclosures (historic, current or anonymous) and of all reports made to the civil authorities.
- 2.30 Where the report relates to a member of the Congregation, the procedures outlined in Appendix 7 shall be followed.
- 2.31 Where the report relates to an employee/volunteer, the procedures outlined in Appendix 8 shall be followed.
- 2.32 A complete written record is kept in relation to the complaint or concern, including subsequent action and all communications with the civil authorities. In particular, a copy of all documentation sent to civil authorities (including but not limited to Standard Reporting Forms (“SRFs”), letters, reports etc) must be retained and stored securely by the DLP. The DLP shall carefully record in writing a contemporaneous attendance note of any telephone calls and/or meetings in person. See Appendix 10 for further information in relation to “Recording Incidents, Allegations, Suspicions and Referrals”.
- 2.33 Appendix 10 (“Recording Incidents, Allegations, Suspicions and Referrals” also gives guidance on confidentiality and information-sharing which makes clear that the protection of the child is the most important consideration. See Appendix 9 for further details.
- 2.34 As detailed in Appendix 10, care must be taken to protect people’s rights to confidentiality. Information will be given to others on a ‘need to know’ basis in order to safeguard the child.
- 2.35 Remember, it is not your role or the role of the DLP to investigate.
- 2.36 Once a report is made to the civil authorities, the advice of the NBSCCCI should be sought by the DLP or by the Regional Leader.
- 2.37 Once a report is made to the civil authorities, the complainant should be offered a Support Person.
- 2.38 The role of the Support Person is detailed below:
- Appointed by the Regional Leader, the Support Person is to be available to those who make an allegation or disclose abuse under this Policy:
 - The role of the Support Person is to assist, where appropriate, with communication with the DLP to facilitate access to information and to represent the needs and concerns of the complainant during the inquiry.
 - Maintaining a positive relationship with the complainant,
 - Keeping lines of communication open,
 - Listening carefully to the complainant,
 - Offering Counselling Services (see page 2).
 - **Note:** the Support Person is **not** a counsellor to the complainant, and should **not** act as their therapist.
- 2.39 The complainant should be offered pastoral support and given the contact details of a Counselling Service. The details are set out at page 2.
- 2.40 Once a report is made, if the allegation relates to a Holy Faith Sister an Advisor should be appointed to the alleged abuser. The role of the Advisor is detailed in Appendix 7.
- 2.41 Once a report is made, the advice of the NBSCCCI should be sought on stepping-aside from Ministry and putting Precepts in place.
- 2.42 Make enquiries to identify the present and previous appointments of the respondent in order to establish whether there were any previous concerns about her practice, or any current grounds for concern in relation to the safety and well-being of children. (Again, in cases of emergency, where a child appears to be at immediate or possible risk, an immediate referral should be made to Tusla. Where appropriate, if Tusla staff are not available, An Garda Síochána should be contacted so as to ensure that under no circumstances is a child be left in a dangerous situation pending intervention by the civil authorities).
- 2.43 Alert the Advisor to be on standby, without identifying the respondent. The role of the Advisor is set out in Appendix 7.

- 2.44 Conduct an initial interview with the respondent as soon as possible, unless Tusla/An Garda Síochána have requested that such an interview be deferred. The advice of Tusla/An Garda Síochána should be obtained before any such interview is carried out to ensure that the civil authorities are happy for the interview to proceed. A written record of the interview must be prepared, agreed with the respondent, signed by all those present at the interview and dated.
- 2.45 Arrange a meeting or consultation with the NCMRG (NBSCCCI) to obtain timely and relevant advices.
- 2.46 Follow the advice given by Tusla/An Garda Síochána where a child protection concern has been referred to them. Allow Tusla/An Garda Síochána to conduct their enquiries unimpeded. Do not visit the family or contact family members without prior discussion with civil investigators.
- 2.47 Maintain good lines of communication and dialogue with the investigating officer of An Garda Síochána and/or the relevant Social Worker to monitor the progress of the case and act on any advice they give. Details of all such contacts made should be recorded on the Child Protection Case File strictly in accordance with the template file guidance issued by the NBSCCCI.
- 2.48 Write to Tusla/An Garda Síochána asking about the progress of their investigation at appropriate stages during the investigation process, and for details of the outcome of their investigations at the conclusion of their investigation.
- 2.49 Conduct an internal investigation upon the conclusion any external investigation by the civil authorities or immediately upon being notified by the civil authorities that they are not going to investigate the matter.
- 2.50 Any internal investigation will be initiated in cases where child protection concerns remain or where disciplinary action/risk management needs to be considered. Such an investigation will gather and assess available information from all sources and witnesses. Every effort should be made, in consultation with Tusla/An Garda Síochána, to avoid the necessity to interview alleged complainant for the purposes of internal/disciplinary inquiries if that would cause further distress to the complainant.
- 2.51 This internal investigation (which takes place after the statutory enquiries have been completed, or in the event that the civil authorities have informed the Holy Faith Sisters that they will not be investigating the matter) should be conducted expeditiously, taking no longer than three months, wherever reasonably possible. In cases where there is a delay, and particularly where a Holy Faith Sister has been temporarily removed from active ministry, it is important to keep everyone informed of the progress of the investigation and to maintain records of such communications.
- 2.52 Relevant Legislation
All individuals to whom this Policy applies must be mindful of the following pieces of criminal legislation:
- Section 176 Criminal Justice Act 2006 – reckless endangerment of children: “A person having authority or control over a child or abuser, who intentionally or recklessly endangers a child by:

 - (a) causing or permitting any child to be placed or left in a situation which creates a substantial risk to the child of being a victim of serious harm or sexual abuse, or
 - (b) failing to take reasonable steps to protect a child from such risk while knowing that the child is in such a situation

is guilty of an offence.
- 2.53 In addition to the 2006 Act, all individual to whom this Policy applies must be mindful of Sections 2 and 3 of the Criminal Justice (Withholding of Information on Offences Against Children and Vulnerable Persons) Act 2012:

A person shall be guilty of an offence if they know or believe that an offence has been committed by another person against a child or vulnerable person, and he/she has information which he knows or believes might be of material assistance in securing the apprehension, prosecution or conviction of that other person for that offence, and fails without reasonable excuse to disclose that information as soon as it is practicable to do so to a member of An Garda Síochána.

- 2.54 All individuals reporting concerns of child abuse shall enjoy protection under the Protection for Persons Reporting Child Abuse Act 1998 where they report child protection concerns to a designated officer of Tusla and/or a member of the Garda Síochána:

Protection from civil liability of persons who have reported child abuse:
Section 3: “A person who, apart from this section, would be so liable shall not be liable in damages in respect of the communication, whether in writing or otherwise, by him or her to an appropriate person of his or her opinion that –
(a) A child has been or is being assaulted, ill-treated, neglected or sexually abused, or
(b) A child’s health, development or welfare has been or is being avoidably impaired or neglected,
unless it is proved that he or she has not acted reasonably and in good faith in forming that opinion and communicating it to the appropriate person.
Protection of employees from penalisation for having reported child abuse:
Section 4: “An employer shall not penalise an employee for having formed an opinion of the kind referred to in section 3 of this Act and communicated it, whether in writing or otherwise, to an appropriate person if the employee has acted reasonably and in good faith in forming that opinion and communicating it to the appropriate person”.

2.55 Unacceptable Behaviour

The Holy Faith Sisters have a process for dealing with complaints made by adults and children about unacceptable behaviour towards children, with clear timescales for resolving the complaint. It is to be noted that all reports, concerns, suspicions, allegations and/or disclosures (current, historical, and/or anonymous) in relation to “child abuse” will be dealt with under the reporting procedures outlined above. In the event that the complaint relates to something other than “child abuse” but which constitutes unacceptable behaviour towards children, the Complaints Procedure set out in Appendix 11 will be applied. Please note that the Complaints Procedure is **not** appropriate for allegations/complaints of “child abuse”.

SECTION 3

Standard 3: Preventing Harm to Children

The Holy Faith Sisters recognise that children should have access to good role models they can trust, who will respect and nurture their spiritual, physical and emotional development. Children have a right to an environment free from child abuse and neglect.

3. Safe Recruiting and Vetting

The Holy Faith Sisters have policies and procedures in place for recruiting personnel and assessing their suitability to work with children. The person in charge of any Holy Faith Congregation/Cluster and ministry/activity directly involved with children has the responsibility of ensuring that proper recruitment practices, and provision for training, supervision, support of employees and volunteers, as well as review of practices, are put in place. The safe recruitment and vetting policy is in line with best practice and guidance. All those who have the opportunity for regular contact with children/vulnerable people or who are in positions of trust complete a form declaring any previous court convictions and undergo other checks (including vetting) as required by legislation and guidance. This information is properly assessed and recorded.

3.1. Agreed Methods of Recruitment

Prior to engaging in any recruitment process, the person in charge will obtain correct approval of the Regional Leader/Board of Management/Manager for any appointment, whether paid or voluntary. The person in charge will ensure good recruitment procedures by:

- 3.1.1. Knowing that young people under eighteen will not be employed by a Holy Faith Congregation or Holy Faith organisation but may be accepted as volunteers, provided there is adequate supervision in place.
- 3.1.2. Completing the “Recruitment Checklist for Safe Recruitment, Vetting and Selection Policy” (Appendix 13) prior to engaging in advertising or recruitment to any position.
- 3.1.3. Defining the role the individual is applying for (see Job Description Template in Appendix 14)
- 3.1.4. The post must be advertised/publicised as widely as possible.
- 3.1.5. The advertisement for the post must stipulate a clear definition of the role and responsibilities (see the Job Description referred to above), as well as the expected skills of the successful applicant.
- 3.1.6. Candidates are furnished with an application form for completion, prior to being called for interview. Candidates are required to complete an application form which contains a clear job description and asks for all relevant information about the applicant, including past experience of working with children. (See Appendix 15 for potential Employees, and Appendix 16 for potential volunteers).
- 3.1.7. Candidates are furnished with information about the organisation and its activities.
- 3.1.8. The application form shall require the applicant to provide the following:
 - Their name
 - Their address
 - A photograph of themselves
 - Their signature

3.2. Application Forms and Interview process

- 3.2.1. Ensuring that applicants complete correct application forms - prospective employees or volunteers applying for any posts of responsibility must complete application forms (see “Sample Application Form” set out in Appendix 15 (for prospective employees) and Appendix 16 (for prospective volunteers)).
- 3.2.2. Obtaining 2 forms of proof of identity (see Appendix 17 for acceptable documentation to verify proof of identity).
- 3.2.3. Interviewing the individual.
- 3.2.4. Candidates will be asked to sign a declaration form, stating that there is no reason why they would be unsuitable to work with children or young people. (See Appendix 18).
- 3.2.5. An interview with each applicant will be carried out by a panel of two or more representatives from the Holy Faith Sisters, using a pre-agreed set of written criteria.
- 3.2.6. At least two written references shall be supplied by each candidate, and these must be subsequently confirmed by phone, letter or a personal visit. References from family members are not acceptable. There shall be a rigorous checking of all references prior to any candidate being offered a position. See Reference Templates available at Appendix 18.
- 3.2.7. Assessing the individual’s experience of working with children and knowledge of child protection issues
- 3.2.8. Assessing their commitment to promoting good practice.
- 3.2.9. Assessing their ability to communicate with children, young people and vulnerable adults (i.e. be approachable). One way of doing this is to ask questions to examine how a person would respond to a particular scenario e.g. are they authoritarian or too relaxed in their approach. **Examples:**
 - a) Tell us about any experiences that have been difficult for you when working with children and young people and how you handled them?
 - b) Tell us how you respond to aggression or young people who are especially challenging?
 - c) Tell us how you go about advising a young person about sexual matters?
 - d) How would you respond to a young person who tells you that they are being abused?
 - e) Tell us what you would do if a young person started sending you text messages unrelated to your work?

3.3. Disclosure Forms

Prior to being offered any position (paid or volunteer) the applicant shall be asked to complete a Disclosure of Criminal Convictions and Permission for Statutory Checks for those Working with Children (See Appendix 19). This sets out details of previous convictions and/or disciplinary procedures relating to the applicant. This information will enable the Holy Faith Sisters to make an informed decision as to the suitability of the applicant.

3.4. Vetting Procedures

- 3.4.1. In accordance with best practice, Garda Vetting/Access NI Vetting should be sought in respect of each applicant prior to the offer of employment/engagement and approximately every 5 years thereafter, or at any time or times within the said 5 year period as deemed necessary.
- 3.4.2. Applicants should be informed early of the requirement for Garda Vetting/Access NI Vetting - ideally at the time of advertising.

- 3.4.3. Checking for vetting procedures - obtaining the individual's signed permission to enable Holy Faith Congregation to request a vetting procedure (See Appendix 20).
- 3.4.4. It is recommended that no person should start work (paid or unpaid) or be engaged, until Vetting procedures have been completed and the vetting outcome has been received. This is discretionary depending on whether working with children or vulnerable adults is involved, or where the individual will be in a position of trust. For example it may be possible for an applicant to start work, subject to vetting, but not with children or vulnerable adults or in a position of trust until the vetting process has been completed. However, advice should be sought in advance of entering into any such arrangement, and a Vetting Form should be completed before taking up any duty, and their taking up position must be made conditional upon a satisfactory vetting outcome.
- 3.4.5. Candidates shall be asked to consent to Garda vetting/PSNI Vetting. Vetting Application Forms are available at Appendix 20 (for Republic of Ireland) and Appendix 21 (for Northern Ireland).
- 3.4.6. Vetting is a pre-condition of employment/volunteering with the Holy Faith Sisters.
- 3.4.7. Vetting clearance must be sought before the final selection is made, and any appointment is made subject to a clear vetting outcome.
- 3.4.8. The Vetting Forms are available from the Regional Vetting Administrator ('Administrator') Sr. Aideen Tierney.
- 3.4.9. The applicant is responsible for completing the form truthfully and fully and returning it to the organisation. Applicants are required to make a full and complete statutory declaration. Any non-disclosure or false disclosure will be considered to be gross misconduct and may result in the immediate dismissal of the volunteer/employee. Please note that a false declaration will be viewed very seriously by the Holy Faith Sisters and may affect the offer of employment/engagement. Where the employee/volunteer is in post, it may result in the employee/volunteer being immediately dismissed for gross misconduct under the disciplinary procedures in place within the workplace.
- 3.4.10. It is the responsibility of the organisation to ensure that the forms are completed correctly and returned to the Administrator.
- 3.4.11. The form is forwarded by the organisation to the 'Administrator' who will examine it for any omissions, mistakes or lack of clarity.
- 3.4.12. An incomplete form is dated and returned to the organisation with a cover letter requesting the form's correction and resubmission. Changes cannot be made other than by the applicant on the authorised form.
- 3.4.13. When the Administrator is satisfied with the form, the applicant's details are entered into the Province Database for Garda Vetting.
- 3.4.14. As soon as possible, the Administrator forwards the form to the Garda Central Vetting Unit (GCVU) either singly or in batches.
- 3.4.15. Vetting clearance/vetting disclosure forms are returned to the Administrator (usually between 4-6 weeks).
- 3.4.16. The organisation is informed of the outcome.
- 3.4.17. When the vetting outcome information is returned, the organisation will make a decision to offer employment/engagement depending on all of the information that is available including interview, education and qualifications achieved, skills assessment, previous employment history/experience, references and medical checks where appropriate etc.
- 3.4.18. Where the returned form contains relevant information to the employment /engagement of the applicant, the organisation must consider seriously whether or not a review meeting is appropriate.

- 3.4.19. There may be certain minor offences/convictions which may not exclude a candidate from being offered a job (eg. a conviction for failure to pay a TV licence). A decision will be made by the recruiting panel on a case by case basis. The recruitment panel will take the following considerations into account when reaching such a decision:
- The paramount importance of child protection, child welfare
 - The reputation and Christian ethos of the Holy Faith Sisters.
 - The need to maintain and uphold an orderly, respectful workplace.
 - The importance of harmony within the Holy Faith Sisters and its wider Congregation, and in particular the preservation of the good working relationship which the Holy Faith Sisters have with the civil authorities.
- 3.4.20. The following criteria will be considered (this list is not exhaustive):
- The nature of any convictions
 - The number of any convictions
 - The frequency of any convictions
 - The post for which the person is seeking employment/engagement
 - The self-disclosure of the conviction/case pending by the applicant
 - Time lapse since last conviction
 - The steps the applicant has taken to prevent reoffending
- 3.4.21. The following areas must also be considered with care:
- Number and frequency of convictions, particularly in the last ten years
 - Non-child protection related offences that may still give cause for concern: for example a prosecution and successful conviction under the Domestic Violence Act 1991
 - Serious road traffic offences such as drunk driving, dangerous driving, hit and run, no insurance and car theft.

3.5. Employment Contracts

When a successful candidate has been selected, a written employment contract will be put in place to comply with employment law:

- 3.5.1. Setting a probationary period (six months for staff and long-term volunteers).
- 3.5.2. Keeping correct Records: For unsuccessful candidates, it is required that the following records must be kept for 18 months after the selection process has been completed: Application Forms completed by all applicants; notes on the screening process; interview notes; and a record of the final selection decisions. For successful candidates, all documentation collected as part of the application, selection, reference and vetting process shall be transferred to their personnel file.

3.6. Induction Training for Employees and Volunteers and Periodic Update/Refreshers

- 3.6.1. All employees and volunteers shall be required to sign an Acceptance Form (See Appendix 22) confirming that they have read, understood and will be bound by the Holy Faith Sisters Policy on Safeguarding Children, and that they will meaningfully engage in all relevant safeguarding training during the course of their employment and/or volunteer work with the Holy Faith Sisters.
- 3.6.2. Initial training and periodic updates and refresher training on Safeguarding Children will be given to all personnel, employees and volunteers in Holy Faith Sisters communities/ministries.
- 3.6.3. A copy of the Safeguarding Children Policy will be given to all personnel and partner ministries, and they will be given the opportunity to seek for clarity on any aspect of this if they do not understand any element.

3.7. Codes of Behaviour

3.7.1. Adult to Child Code of Behaviour

The Holy Faith Sisters provides policy guidance and training on appropriate and expected standards of behaviour of adults towards children and vulnerable persons. The Code of Behaviour is set out at Appendix 23.

3.7.2. The Holy Faith Sisters are committed to dealing with children's unacceptable behaviour in ways that do not involve physical punishment or any other form of degrading or humiliating treatment.

3.7.3. Sanctions should be implemented consistently, fairly and firmly and not used as threat. Children should be helped to understand why sanctions are being imposed. When a sanction has been imposed, it is important that a child is able to feel that she or he is still valued.

3.7.4. The Code of Behaviour makes it clear to all members of the Congregation, employees, volunteers, and children that discriminatory behaviour or language is not acceptable.

3.7.5. Sometimes, children can be disruptive and their behaviour can be challenging. Such behaviour can put at risk the safety of the child himself or herself, as well as that of other children and of workers. Workers need to be trained and prepared for coping with disruptive behaviour. It is recommended that:

- More than one worker is present when challenging behaviour is being dealt with
- A record is kept in an incident book, describing what happened, the circumstances, who was involved, any injury to a person or damage to property arising from the incident and how the situation was resolved.

3.7.6. Child to Child Anti-Bullying Procedure

All Holy Faith Sisters in their ministries are legally and contractually obliged to adhere to the Department of Education and Skills Anti-Bullying Procedures for Schools for Primary and Post-Primary Schools (issued September 2013) and to follow the Procedures adopted by the school pursuant to those Department of Education and Skills Anti-Bullying Procedures for Schools for Primary and Post-Primary Schools.

3.7.7. Discipline and dealing with challenging behaviour: As far as possible, disciplining of children should be in the form of positive reinforcement. Rules about discipline and sanctions should be agreed as part of the policy and accepted by all workers and children as a condition of becoming involved.

3.7.8. When issuing the Permission/Consent Forms to Parents/Guardians (see Appendix 26 which is based on Resource 7 of NSCCCI Resources), parent/guardians will receive a copy of the following documents:

- (a) The Holy Faith Sisters Policy on Safeguarding Children
- (b) 'Anti-Bullying Procedures' and will sign an 'Acknowledgement and Acceptance' of the Anti-Bullying Procedures.

Parents are encouraged to provide the Holy Faith Sisters with their views and feedback on the Holy Faith Sisters policies and procedures on keeping children safe.

3.8 Raising Concerns/Whistleblowing

3.8.1 There are clear ways for personnel within the Holy Faith Sisters to raise allegations, suspicions, concerns, reports and allegations of unacceptable behaviour towards children by other personnel or volunteers ("**whistle-blowing**") confidentially if necessary.

3.8.2 Allegations, concerns and suspicions about unacceptable behaviour towards children by other Holy Faith Sisters, employees, personnel or volunteers will be treated confidentially.

- 3.8.3 Such allegations, concerns and suspicions should be brought to the attention of the DLP in accordance with Section 2.
- 3.8.4 In the event that the member of the Congregation/employee/volunteer feels unable, for whatever reason, to go to the DLP, they shall go to their line manager and/or to the Regional Leader to raise their allegations, suspicions, concerns, reports and allegations of unacceptable behaviour.
- 3.8.5 The line-manager and/or the Regional Leader will then immediately notify the DLP and follow the Holy Faith Sisters reporting procedures outlined at Section 2 of this Policy.
- 3.8.6 The Holy Faith Sisters are committed to safeguarding children, and are committed to upholding the legal requirements as set out in the Protection Disclosures Act 2014.
- 3.8.7 In the event that the individual raising allegations, concerns and suspicions about unacceptable behaviour towards children wishes to have their identity protected, the Holy Faith Sisters shall have regard to their legal obligations pursuant to section 16 of the Protected Disclosures Act 2014 and best practice as outlined in *Children First 2011*.
- 3.8.8 **How to respond to people raising a concern/report**
- 3.8.8.1 It is often very difficult for people to talk about abuse so it is important to make sure that you are patient, listen carefully and actively, and create a safe environment in which they feel able to tell you as much as they can remember. This will help those people whose responsibility it is to investigate the incident(s) do so as thoroughly as possible.
- 3.8.8.2 In addition, when a member of the Congregation/employee/volunteer comes forward with a report of child abuse or unacceptable behaviour relating to another member of the Congregation/employee/volunteer (“whistle-blowing”) they should be listened to and asked to bring their concerns to the DLP, or if they feel unable to do so, to their line manager and/or the Regional Leader who will immediately notify the DLP in line with the reporting procedures outlined at Section 2 above.
- 3.8.8.3 People may tell you about:
- abuse that’s happened to them now – current
 - abuse that happened to them some time ago – historical
 - something they’ve been told by someone else and that they strongly believe is true
 - seeing signs of abuse, such as physical injuries on a child
 - something that they have witnessed, such as the behaviour of an adult to a child that made them feel uncomfortable or which was unacceptable
- 3.8.8.4 Where information is given in person, consider the following:
- Listen carefully to that person, but do not ask intrusive or leading questions.
 - Stay calm, take what the person raising the concern says seriously, and reassure them.
 - Allow the person to continue at his/her own pace.
 - Check with the person to make sure that you have understood what they actually said. Do not suggest words, but use theirs.
 - Make no promises that cannot be kept, particularly in relation to secrecy, but listen carefully to what is being sought.
 - Explain these procedures and the referral procedures to the person.

- Offer a Support Person (see the role of the Support Person set out at Section 2).
 - Do not make any comments about the respondent, make assumptions or speculate.
 - Be aware that a person's ability to recount his or her concern or allegation will depend on age, culture, nationality and upon any disability which may affect use of language and range of vocabulary.
- 3.8.8.5 Adopt a listening style which is compassionate, calm and reassuring.
- 3.8.8.6 If the information given to you shocks, disgusts or distresses you, do not allow these feelings to show. If you do, you may inadvertently dissuade the person from giving any further information.
- 3.8.8.7 Avoid statements about your belief or otherwise, of the information given.
- 3.8.8.8 Do not question beyond checking what has been said. It is the job of TUSLA/An Garda Síochána and/or the DHSSPS and PSNI to investigate. There must be no probing for detail beyond that which has been freely given.
- 3.8.8.9 Listening does not mean telling a person to stop when they are freely recalling events because some facts are only ever told once, the information given must be fully and accurately recorded. However, it is better that such detail is given directly to a professional from one of Tusla/ An Garda Síochána and/or the DHSSPS and PSNI to allow proper procedures to be observed and to avoid the distress of having to repeat the account more than once.

3.9 Personal/Intimate Care for Children with Disabilities

The Holy Faith Sisters have issued guidelines on personal/intimate care of children with disabilities, including appropriate and inappropriate touch. See Appendix 24.

3.10 Operating Safe Activities for Children

3.10.1 **There is guidance on assessing all possible risks when working with children – especially in activities that involve time spent away from home.**
See Appendix 25 for further details.

3.10.2 **When operating projects/activities children are adequately supervised and protected at all times**

In every Holy Faith Congregation/Cluster and ministry, children are to be appropriately supervised. See Appendix 25 for further details and guidelines.

3.10.2.1 **Supervision and support of workers:**

It is good practice to set up a supervision system for workers. This means arranging to see staff and volunteers at regular intervals on their own or in small groups, and giving them an opportunity to raise any questions that they may have, any problems they are experiencing, or any suggestions for change that they wish to make. It allows managers to assess the need for change in policies or practice, or for the provision of additional training.

3.10.2.2 It is useful to keep a brief, written record of the discussion that takes place during supervision. It is also important to have a system of written review of workers so that they can be given recognition for the good work they are doing and helped to develop their skills further.

- 3.10.2.3 Setting up supervision and review arrangements allows an opportunity to observe workers at a number of levels. It makes it easier to assess workers' competence in performing their tasks, and also gives an opportunity to observe the development of relationships between workers, and between workers and children. It is good practice for managers to be aware of the attitudes of workers, and the interactions that take place between them and the children and with each other. Managers should be alert to any unusual incidents or activities that take place where workers may be putting themselves in vulnerable positions.

3.11 Guidelines for IT, mobile phones, email, cameras, websites etc.

Each Holy Faith ministry should have a clear Communications and Information Technology (I.T.) Policy. Where the Holy Faith Sisters are involved in running or administering any activities for children or young people, the following principles shall be respected and applied strictly by all members of the Congregation, employees and volunteers.

- 3.11.1 Where a computer is used by more than one person, each person should be obliged to have a unique username and password, or where this is not possible, to maintain a signed record of the date, time and duration of their use of the computer.
- 3.11.2 Where a computer can be accessed by children or young people, it should be accessible only through the use of a username and password unique to each child. Where this is not possible, the children or young people should be obliged to provide a signed record of the date, time and duration of their use of the computer.
- 3.11.3 Computers which can be accessed by children or young people should always employ appropriate filtering software.
- 3.11.4 All the computers in the offices of Holy Faith Sisters communities/clusters and in Holy Faith ministries/activities should be monitored regularly to ensure that they are being used in accordance with the stated policy. Where there is any suspicion or doubt, a person with specialist knowledge of computer hardware and software should be asked to assess the purposes for which the computer has been used.
- 3.11.5 Each organisation needs to assess the possible ways that children communicate with personnel, volunteers and each other, such as via the internet, mobile phones, email using digital and other online systems.
- 3.11.6 It is important to develop guidance to reduce the risks to children that may arise in the course of their use of computers, and other form of electronic and information technology. Such risks include:
- (a) being groomed online by paedophiles
 - (b) experiencing online bullying
 - (c) accessing or being exposed to inappropriate or harmful material
 - (d) having their personal contact details accessed and circulated
 - (e) having personal images uploaded and used without consent.
- 3.11.7 Generally speaking leaders shall NOT share their person phone number(s)/mobile numbers with children/young people.
- 3.11.8 Where it is necessary for organisation purposes, permission slips/consent forms from parents must ask: 'Can Leaders send messages by text to participants about upcoming meetings?' NB: It is best practice to copy all texts to parent/guardian.
- 3.11.9 Any employee, or volunteer or leader who receive a 'Friend Request' from a child/young person via a social media website or via email in their activity SHOULD ALWAYS CLICK 'IGNORE' or otherwise not respond to the "friend request".

- 3.11.10 Always ensure that the content of recorded / photographed material is appropriate.
- (a) All recording on phone, camera or other devices must be supervised.
 - (b) Parents and children must give consent to the use of material/images that is recorded.
 - (c) Recorded material/images likely to be shared/published in press or on the internet should avoid using children's full names (first name and surname) and detailed addresses.
 - (d) Parents and children must be made aware in advance of the way the data/images will be used to represent the organisation or activity.
 - (e) Where IT is available and used by children or young people, the organisers will attempt to ensure that unsuitable sites are blocked, to make sure children are not coming in contact online with sites or web users which pose a threat or which would be unsuitable or age-inappropriate.
 - (f) If the websites cannot be blocked, all computer time should be closely monitored.
- 3.11.11 In relation to images captured by photography and/or other recording devices including but not limited to smart phones, tablets and/or other personal devices, each ministry needs to consider how its personnel (Holy Faith Sisters, employees and volunteers) use images (such as photographs and film) of children in publications or on websites. Guidance needs to be developed to ensure that:
- (a) Always ensure that the content of the photo/film is appropriate.
 - (b) there is an agreed approach as to whether and in what manner children may be identified in photographs and other images likely to be published in print media or on the Internet;
 - (c) One-to-one photo sessions with children must be supervised.
 - (d) Parents and children must give consent to the use of an image and that this is consent recorded
 - (e) Photographs/ images likely to be published in press or on the Internet should avoid using children's full names (first name and surname) and detailed addresses which may expose the child to the risk of grooming or exploitation.
 - (f) parents and children must be made aware in advance of the way the image will be used to represent the organisation or ministry or activity.

SECTION 4

Standard 4: Training and Education for Keeping Children Safe

4. Training and Education

4.1. Induction

- 4.1.1. All Holy Faith personnel (including Holy Faith Sisters, employee and volunteers) are inducted into the Holy Faith Sisters Policy on Safeguarding Children.
- 4.1.2. Where members of the Holy Faith Sisters who are not members of the Irish Region are coming to Ireland to live and/or work for 3 months or more, they shall receive induction and training in accordance with the guidelines set out above.
- 4.1.3. They are required to sign a Declaration accepting the Policy (see Appendix 22) when they begin working or volunteering within the organisation.
- 4.1.4. On appointment, each person will be given:
 - (a) The name and contact details of the DLP and advised of the role of the DLP in relation to child protection procedures
 - (b) The name of the Local Safeguarding Representative and advised of the role of the Local Representative in relation to child protection procedures.
 - (c) A copy of Holy Faith Sisters Policy on Safeguarding Children.
 - (d) A copy of the Holy Faith Sisters Code of Practice (see Appendix 23).
- 4.1.5. At induction, there is training given for all personnel who work with or who may come into contact with children or young people or vulnerable people, covering Holy Faith Sisters policy and procedures on child protection, when they join Holy Faith Ministries/activities.
- 4.1.6. An induction programme can help the successful integration of a new employee or volunteer. This programme may include: introductions to Holy Faith Sisters and to colleagues, training in Holy Faith child protection policy; explanations of day-to-day processes; expectations; conditions and procedures for dealing with discipline; procedures for dealing with grievances and allegations; familiarisation with the ethos of Holy Faith Sisters. Familiarity with lines of management and supervision are particularly important.

4.2. Training Needs

- 4.2.1. Everyone who comes into contact with children has a role to play in their protection. To carry out this role confidently and effectively they need to be aware of child protection issues and to have the necessary knowledge and skills to keep children safe.
- 4.2.2. In order to maintain high standards and good practice, all personnel shall be required to attend regular refresher training in child protection.
- 4.2.3. There are opportunities for all personnel to refresh, develop and maintain the necessary attitudes, skills and knowledge to keep children safe. Regular opportunities are given to all individuals to update their skills and knowledge should be provided.
- 4.2.4. All those working in Holy Faith communities or ministries/activities, whether as members of the Congregation, as staff or as volunteers, will be given training in child protection policies and procedures, including information about how to respond to suspicions and allegations of child abuse.
- 4.2.5. To maintain high standards and good practice generally, training will be provided on an ongoing basis.

4.3. Those with additional responsibilities

- 4.3.1. Training is provided to those with additional responsibilities such as recruiting and selecting staff, dealing with vetting applications and vetting outcomes, dealing with complaints, disciplinary processes, managing risk or acting as a Local Safeguarding Representative.
- 4.3.2. Training programmes are approved by and/or provided by National Board for Safeguarding Children and updated in line with current legislation, guidance and best practice.

SECTION 5

Standard 5: Communicating the Church's safeguarding message

5. Communicating the Safeguarding message

- 5.1. The Holy Faith Sisters Policy Statement on Safeguarding Children is displayed at the entrance/foyer of every Congregational property or house. It is also available on our website (www.holyfaithsisters.org).
- 5.2. Children who come into contact with or receive services from the Holy Faith Sisters are made aware of their right to be safe from abuse, and who to speak to if they have concerns. The name and contact details of the DLP are prominently displayed at the entrance/foyer of every Congregational property or house. These details are also available on our website (www.holyfaithsisters.org/ireland/).
- 5.3. Everyone in our Congregation and who is employed by or volunteers with us knows who the DLP is and how to contact her.
- 5.4. The contact details for the civil authorities (TUSLA, An Garda Siochana, DHSSPS, PSNI etc) are prominently displayed near the telephone of every Congregational property or house.
- 5.5. We have open and transparent links with the civil authorities, and in particular the statutory child protection agencies. We endeavour to develop good working relationship with them in order to keep children safe.
- 5.6. The Holy Faith Sisters do not have a written "Communications Policy" on communicating the safeguarding message however the small size of our Congregation facilitates easy and clear internal communication. Each Congregational property/cluster appoints a Local Safeguarding Representatives who works to ensure that the safeguarding message is clearly understood in each community. The Local Safeguarding Representative is trained and works to support the DLP.
- 5.7. We work hard to promote our Policy on Safeguarding Children, and everyone has clearly defined roles. We work hard to ensure that all members of the Congregation, employees, volunteers, children and parents are aware of our Policy on Safeguarding Children. This reflects our commitment to transparency and openness. If children have a worry or concern, they are encouraged to come to the DLP, or to another member of the Congregation, to an employee or a volunteer to make a complaint or express a concern. Our Safeguarding Policy including contact information is clearly displayed in all our houses.

SECTION 6

Standard 6: Access to Advice and Support

6. Advice and Support

- 6.1. Due to the relatively small size of the Irish Region of the Congregation, and the small number of complaints, the Irish Region does not have an Advisory Committee or an Advisory Panel. These functions are fulfilled by the services of the NCMRG (detailed below). A Data Processing Deed was signed between the NBSCCCI and the Congregation on 13th January 2012 formalising this relationship. It is hoped that the NCMRG will support the DLP and the Regional Leader and provides tailored advice and guidance on complaints, fitness for ministry and risk management.
- 6.2. The Holy Faith Sisters are committed to working in partnership with civil authorities to ensure that all aspects of child welfare are managed promptly, professionally and justly. We will adhere to best practice, notably ‘Children First’: National Guidance for the Protection and Welfare of Children (2011), ‘Child Protection and Welfare’ Practice Handbook (2011) and to Church Guidance including “Safeguarding Children Standards and Guidance Document for the Catholic Church in Ireland” (2008). All child safeguarding concerns must be reported to the civil authorities without delay.
- 6.3. This Policy on Safeguarding Children sets out clear guidance on how to respond to and support a child who is suspected to have been abused, whether that abuse is by someone within the Church or in the community, by a family member or by peers. See Appendix 12.
- 6.4. Information is provided in this Policy on how those who have experienced abuse can seek support. Those who have suffered child abuse should receive a compassionate and just response and should be offered appropriate pastoral care to rebuild their lives. Each complainant should be offered counselling. See page 2 for the appropriate contact details of counselling organisations. Each complainant should also be offered a Support Person, (see Section 2). See the contact details for various counselling services set out on page 2.
- 6.5. Appropriate support is provided to those who have perpetrated abuse to help them to face up to the reality of abuse as well as to promote healing in a manner which does not compromise children’s safety. See Appendix 7 and the details in relation to the appointment of an Advisor to the respondent, and the role and responsibility of the Advisor.
- 6.6. The role of the Support Person and the Advisor are very different. Under no circumstances should the same Support Person be provided for the child/adult making the complaint and for the alleged abuser. Both the Support Person and the Advisor requires appropriate training, and to be supported in their role.

SECTION 7

Standard 7: Implementing and Monitoring the Standards

7. Advice and Support

- 7.1 This Policy on Safeguarding Children constitutes the Congregation's written plan showing what steps will be taken to keep children safe. The Policy sets out clear guidelines on who is responsible for implementing these measures and when these will be completed.
- 7.2 A review of the implementation of this Policy will take place each year as part of the annual Regional leadership team's review. The review mechanism will include the completion of an annual checklist by the DLP (see Appendix 5).
- 7.3 This Policy was adopted by the Regional Leadership Team on 22nd October, 2014. It was distributed to each Congregational house/cluster and will be brought to the attention of the members of the Congregation in each house/cluster by the Local Safeguarding Representative.
- 7.4 Each Local Safeguarding Representative should address the specific requirements arising from the nature of the varied activities being undertaken by that particular house/cluster.
- 7.5 The human or financial resources necessary for implementing the plan shall be made available by the Regional Leadership Team. The Holy Faith Sisters will dedicate such necessary human and financial resources as are necessary for implementing this Safeguarding Policy and promoting our safeguarding message generally.
- 7.6 The DLP shall monitor compliance with this Policy while carrying out an assessment of training needs each 12 months.
- 7.7 Parents/guardians/carers are welcome and encouraged to provide the Holy Faith Sisters with your views and feedback on the Holy Faith Sisters policies and procedures on keeping children safe. See Page 1.
- 7.8 All incidents, allegation/suspensions of abuse are recorded and stored securely. See Appendix 10. The Holy Faith Sisters recognise the importance of preserving people's rights to confidentiality.

APPENDIX 1

What is Child Abuse?

Extract from *Children First 2011*, Chapter 2

2.2 Definition of “neglect”.

- 2.2.1 Neglect can be defined in terms of an omission, where the child suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, and/or medical care.
- 2.2.2 Harm can be defined as the ill-treatment or the impairment of the health or development of a child. Whether it is significant is determined by the child’s health and development as compared to that which could reasonably be expected of a child of similar age.
- 2.2.3 Neglect generally becomes apparent in different ways over a period of time rather than at one specific point. For example, a child who suffers a series of minor injuries may not be having his or her needs met in terms of supervision and safety. A child whose height or weight is significantly below average may be being deprived of adequate nutrition. A child who consistently misses school may be being deprived of intellectual stimulation.
- 2.2.4 The threshold of significant harm is reached when the child’s needs are neglected to the extent that his or her wellbeing and/or development are severely affected.

2.3 Emotional Abuse

- 2.3.1 Emotional abuse is normally to be found in the relationship between a parent/carer and a child rather than in a specific event or pattern of events. It occurs when a child’s developmental need for affection, approval, consistency and security are not met. Unless other forms of abuse are present, it is rarely manifested in terms of physical signs or symptoms. Examples may include:
 - i the imposition of negative attributes on a child, expressed by persistent criticism, sarcasm, hostility or blaming;
 - ii conditional parenting in which the level of care shown to a child is made contingent on his or her behaviours or actions;
 - iii emotional unavailability of the child’s parent/carer;
 - iv unresponsiveness of parent/carer and/or inconsistent or inappropriate expectations of the child;
 - v premature imposition of responsibility on the child;
 - vi unrealistic or inappropriate expectations of the child’s capacity to understand something or to behave and control himself or herself in a certain way;
 - vii under- or over-protection of the child;
 - viii failure to show interest in, or provide age-appropriate opportunities for the child’s cognitive and emotional development;
 - ix use of unreasonable or over-harsh disciplinary measures;
 - x exposure to domestic violence;
 - xi exposure to inappropriate or abusive material through new technology.
- 2.3.2 Emotional abuse can be manifested in terms of the child’s behavioural, cognitive, affective or physical functioning. Examples of these include insecure attachment, non-organic failure to thrive, unhappiness, low self-esteem, educational and developmental underachievement, and oppositional behaviour. The threshold of significant harm is reached when abusive interactions dominate and become typical of the relationship between the child and the parent/carer.

2.4 Physical Abuse

2.4.1 Physical abuse of a child is that which results in actual or potential physical harm from an interaction, or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents.

Physical abuse can involve:

- i severe physical punishment;
- ii beating, slapping, hitting or kicking;
- iii pushing, shaking or throwing;
- iv pinching, biting, choking or hair-pulling;
- v terrorising with threats;
- vi observing violence;
- vii use of excessive force in handling;
- viii deliberate poisoning;
- ix suffocation;
- x fabricated/induced illness (see Appendix 1 of Children First for details);
- xi allowing or creating a substantial risk of significant harm to a child.

2.5 Definition of “sexual abuse”

2.5.1 Sexual abuse occurs when a child is used by another person for his or her gratification or sexual arousal, or for that of others. Examples of child sexual abuse include the following:

- i exposure of the sexual organs or any sexual act intentionally performed in the presence of the child;
- ii intentional touching or molesting of the body of a child whether by a person or object for the purpose of sexual arousal or gratification;
- iii masturbation in the presence of the child or the involvement of the child in an act of masturbation;
- iv sexual intercourse with the child whether oral, vaginal, or anal;
- v sexual exploitation of a child includes inciting, encouraging propositioning, requiring or permitting a child to solicit for, or to engage in, prostitution or other sexual acts. Sexual exploitation also occurs when a child is involved in the exhibition, modelling or posing for the purpose of sexual arousal, gratification or sexual act, including its recording (on film, video tape or other media) or the manipulation, for those purposes, of the image by computer or other means. It may also include showing sexually explicit material to children which is often a feature of the “grooming” process by perpetrators of abuse;
- vi consensual sexual activity involving an adult and an underage person. In relation to child sexual abuse, it should be noted that, for the purposes of the criminal law, the age of consent to sexual intercourse is 17 years for boys and girls. An Garda Síochána will deal with the criminal aspects of the case under the relevant legislation.

2.5.2 It should be noted that the definition of child sexual abuse presented in this section is not a legal definition and is not intended to be a description of the criminal offence of sexual assault.

APPENDIX 2

Signs and Symptoms of Child Abuse Extract from Children First – Appendix 1.

1. Signs and symptoms of neglect

Child neglect is the most common category of abuse. A distinction can be made between 'wilful' neglect and 'circumstantial' neglect. 'Wilful' neglect would generally incorporate a direct and deliberate deprivation by a parent/carer of a child's most basic needs, e.g. withdrawal of food, shelter, warmth, clothing, contact with others. 'Circumstantial' neglect more often may be due to stress/inability to cope by parents or carers.

Neglect is closely correlated with low socio-economic factors and corresponding physical deprivations. It is also related to parental incapacity due to learning disability or psychological disturbance.

The neglect of children is 'usually a passive form of abuse involving omission rather than acts of commission' (Skuse and Bentovim, 1994). It comprises 'both a lack of physical caretaking and supervision and a failure to fulfil the developmental needs of the child in terms of cognitive stimulation'.

Child neglect should be suspected in cases of:

- abandonment or desertion;
- children persistently being left alone without adequate care and supervision;
- malnourishment, lacking food, inappropriate food or erratic feeding;
- lack of warmth;
- lack of adequate clothing;
- inattention to basic hygiene;
- lack of protection and exposure to danger, including moral danger or lack of supervision appropriate to the child's age;
- persistent failure to attend school;
- non-organic failure to thrive, i.e. child not gaining weight due not only to malnutrition but also to emotional deprivation;
- failure to provide adequate care for the child's medical problems and developmental problems;
- exploited, overworked.

2. Characteristics of neglect

Child neglect is the most frequent category of abuse both in Ireland and internationally. In addition to being the most frequently reported type of abuse; neglect is also recognized as being the most harmful. Not only does neglect generally last throughout a childhood it also has long term consequences into adult life. Children are more likely to die from chronic neglect than from one instance of physical abuse. It is well established that severe neglect in infancy has a serious negative impact on brain development.

Neglect is associated with but not necessarily caused by poverty. It is strongly correlated with parental substance misuse, domestic violence and parental mental illness and disability.

Neglect may be categorised into different types: (adapted from Dubowitz, 1999):

- **disorganised/chaotic neglect:** this is typically where parenting is inconsistent and is often found in disorganized and crises prone families. The quality of parenting is inconsistent, with a lack of certainty and routine often resulting in emergencies regarding accommodation, finances and food. This type of neglect results in attachment disorders, promotes anxiety in children and leads to disruptive and attention seeking behaviour, with older children proving more difficult to control and discipline. The home may be unsafe from accidental harm, with a high incident of accidents occurring.
- **depressed or passive neglect:** this type of neglect fits the common stereotype and is often characterized by bleak and bare accommodation, without material comfort and with poor hygiene and little if any social and psychological stimulation. The household will have few toys, and those that are there may be broken, dirty or inappropriate for age. Young children will spend long periods in cots, playpens or pushchairs. There is often a lack of food, inadequate bedding and no clean clothes. There can be a sense of hopelessness, coupled with ambivalence about improving the household situation. In such environments children frequently are absent from school and have poor homework routines, Children subject to these circumstances are at risk of major developmental delay.
- **chronic deprivation:** this is most likely to occur where there is the absence of a key attachment figure. It is most often found in large institutions where infants and children may be physically well cared for but where there is no opportunity to form an attachment with an individual carer. In these situations children are dealt with by a range of adults, and their needs seen as part of the demands of a group of children. This form of deprivation will also be associated with poor stimulation and can result in serious developmental delays.

The following points illustrate the consequences of different types of neglect for children:

- Inadequate food - failure to develop
- Household hazards – accidents
- Lack of hygiene – health and social problems
- Lack of attention to health – disease
- Inadequate mental health care – suicide or delinquency
- Inadequate emotional care – behaviour and educational
- Inadequate supervision – risk taking behaviour
- Unstable relationship – attachment problems
- Unstable living conditions – behaviour & anxiety, risk of accidents
- Exposure to domestic violence – behaviour, physical and mental health
- Congregation violence - anti social behaviour

3. Signs and symptoms of emotional neglect and abuse

Emotional neglect and abuse is found typically in a home lacking in emotional warmth. It is not necessarily associated with physical deprivation. The emotional needs of the children are not met; the parent's relationship to the child may be without empathy and devoid of emotional responsiveness.

Emotional neglect and abuse occurs when adults responsible for taking care of children are unaware of and unable (for a range of reasons) to meet their children's emotional and developmental needs. Emotional neglect and abuse is not easy to recognise because the effects are not easily observable. Skuse (1989) states that 'emotional abuse refers to the habitual verbal harassment of a child by disparagement, criticism, threat and ridicule, and the inversion of love; whereby verbal and non-verbal means of rejection and withdrawal are substituted'.

Emotional neglect and abuse can be defined with reference to the indices listed below. However, it should be noted that no one indicator is conclusive of emotional abuse. In the case of emotional abuse and neglect, it is more likely to impact negatively on a child where there is a cluster of indices, where these are persistent over time and where there is a lack of other protective factors

- rejection;
- lack of comfort and love;
- lack of attachment;
- lack of proper stimulation (e.g. fun and play);
- lack of continuity of care (e.g. frequent moves);
- serious over-protectiveness;
- inappropriate non-physical punishment (e.g. locking in bedrooms);
- family conflicts and/or violence;
- every child who is abused sexually, physically or neglected is also emotionally abused;
- inappropriate expectations of a child's behaviour, relative to his/her age and stage of development.

Children who are physically and sexually abused and neglected also suffer from emotional abuse.

4. Signs and symptoms of physical abuse

Unsatisfactory explanations or varying explanations, frequency and clustering for the following events are high indices for concern regarding physical abuse:

- bruises (see below for more detail);
- fractures;
- swollen joints;
- burns/scalds (see below for more detail);
- abrasions/lacerations;
- haemorrhages (retinal, subdural);
- damage to body organs;
- poisonings – repeated (prescribed drugs, alcohol);
- failure to thrive;
- coma/unconsciousness;
- death.

There are many different forms of physical abuse, but skin, mouth and bone injuries are the most common.

Bruises

Accidental

Accidental bruises are common at places on the body where bone is fairly close to the skin. Bruises can also be found towards the front of the body, as the child usually will fall forwards.

Accidental bruises are common on the chin, nose, forehead, elbow, knees and shins. An accident-prone child can have frequent bruises in these areas. Such bruises will be diffuse, with no definite edges. Any bruising on a child before the age of mobility must be treated with concern.

Non-accidental

Bruises caused by physical abuse are more likely to occur on soft tissues, e.g. cheek, buttocks, lower back, back, thighs, calves, neck, genitalia and mouth.

Marks from slapping or grabbing may form a distinctive pattern. Slap marks might occur on buttocks/cheeks and the outlining of fingers may be seen on any part of the body. Bruises caused by direct blows with a fist have no definite pattern, but may occur in parts of the body that do not usually receive injuries by accident. A punch over the eye (black eye syndrome) or ear would be of concern. Black eyes cannot be caused by a fall on to a flat surface. Two black eyes require two injuries and must always be suspect. Other distinctive patterns of bruising may be left by the use of straps, belts, sticks and feet. The outline of the object may be left on the child in a bruise on areas such as the back or thighs (areas covered by clothing).

Bruises may be associated with shaking, which can cause serious hidden bleeding and bruising inside the skull. Any bruising around the neck is suspicious since it is very unlikely to be accidentally acquired. Other injuries may feature – ruptured eardrum/fractured skull.

Mouth injury may be a cause of concern, e.g. torn mouth (frenulum) from forced bottle-feeding.

Bone injuries

Children regularly have accidents that result in fractures. However, children's bones are more flexible than those of adults and the children themselves are lighter, so a fracture, particularly of the skull, usually signifies that considerable force has been applied.

Non-accidental

A fracture of any sort should be regarded as suspicious in a child under 8 months of age. A fracture of the skull must be regarded as particularly suspicious in a child under 3 years.

Either case requires careful investigation as to the circumstances in which the fracture occurred. Swelling in the head or drowsiness may also indicate injury.

Burns

Children who have accidental burns usually have a hot liquid splashed on them by spilling or have come into contact with a hot object. The history that parents give is usually in keeping with the pattern of injury observed. However, repeated episodes may suggest inadequate care and attention to safety within the house.

Non-accidental

Children who have received non-accidental burns may exhibit a pattern that is not adequately explained by parents. The child may have been immersed in a hot liquid. The burn may show a definite line, unlike the type seen in accidental splashing. The child may also have been held against a hot object, like a radiator or a ring of a cooker, leaving distinctive marks. Cigarette burns may result in multiple small lesions in places on the skin that would not generally be exposed to danger. There may be other skin conditions that can cause similar patterns and expert paediatric advice should be sought.

Bites

Children can get bitten either by animals or humans. Animal bites, e.g. dogs, commonly puncture and tear the skin, and usually the history is definite. Small children can also bite other children.

Non-accidental

It is sometimes hard to differentiate between the bites of adults and children since measurements can be inaccurate. Any suspected adult bite mark must be taken very seriously. Consultant paediatricians may liaise with dental colleagues in order to identify marks correctly.

Poisoning

Children may commonly take medicines or chemicals that are dangerous and potentially life threatening. Aspects of care and safety within the home need to be considered with each event.

Non-accidental

Non-accidental poisoning can occur and may be difficult to identify, but should be suspected in bizarre or recurrent episodes and when more than one child is involved. Drowsiness or hyperventilation may be a symptom.

Shaking violently

Shaking is a frequent cause of brain damage in very young children.

Fabricated/induced illness

This occurs where parents, usually the mother (according to current research and case experience), fabricate stories of illness about their child or cause physical signs of illness. This can occur where the parent secretly administers dangerous drugs or other poisonous substances to the child or by smothering. The symptoms that alert to the possibility of fabricated/induced illness include:

- (a) symptoms that cannot be explained by any medical tests; symptoms never observed by anyone other than the parent/carer; symptoms reported to occur only at home or when a parent/carer visits a child in hospital;
- (b) high level of demand for investigation of symptoms without any documented physical signs;
- (c) unexplained problems with medical treatment, such as drips coming out or lines being interfered with; presence of unprescribed medication or poisons in the blood or urine.

5. Signs and Symptoms of Sexual Abuse

Child sexual abuse often covers a wide spectrum of abusive activities. It rarely involves just a single incident and usually occurs over a number of years. Child sexual abuse most commonly happens within the family. Cases of sexual abuse principally come to light through:

- (a) disclosure by the child or his/her siblings or friends;
- (b) the suspicions of an adult;
- (c) physical symptoms.

Colburn Faller (1989) provides a description of the wide spectrum of activities by adults which can constitute child sexual abuse. These include:

Non-contact sexual abuse

- 'Offensive sexual remarks', including statements the offender makes to the child regarding the child's sexual attributes, what he or she would like to do to the child and other sexual comments.
- Obscene phone-calls.
- Independent 'exposure' involving the offender showing the victim his/her private parts and/or masturbating in front of the victim.
- 'Voyeurism' involving instances when the offender observes the victim in a state of undress or in activities that provide the offender with sexual gratification. These may include activities that others do not regard as even remotely sexually stimulating.

Sexual contact

- Involving any touching of the intimate body parts. The offender may fondle or masturbate the victim, and/or get the victim to fondle and/or masturbate them. Fondling can be either outside or inside clothes. It also includes 'frottage', i.e. where offender gains sexual gratification from rubbing his/her genitals against the victim's body or clothing.

Oral-genital sexual abuse

- Involving the offender licking, kissing, sucking or biting the child's genitals or inducing the child to do the same to them.

Interfemoral sexual abuse

- Sometimes referred to as 'dry sex' or 'vulvar intercourse', involving the offender placing his penis between the child's thighs.

Penetrative sexual abuse, of which there are four types:

- 'Digital penetration', involving putting fingers in the vagina or anus, or both. Usually the victim is penetrated by the offender, but sometimes the offender gets the child to penetrate them.
- 'Penetration with objects', involving penetration of the vagina, anus or occasionally mouth with an object.
- 'Genital penetration', involving the penis entering the vagina, sometimes partially.
- 'Anal penetration' involving the penis penetrating the anus.

Sexual exploitation

- Involves situations of sexual victimisation where the person who is responsible for the exploitation may not have direct sexual contact with the child. Two types of this abuse are child pornography and child prostitution.
- 'Child pornography' includes still photography, videos and movies, and, more recently, computer generated pornography.
- 'Child prostitution' for the most part involves children of latency age or in adolescence. However, children as young as 4 and 5 are known to be abused in this way.

The sexual abuses described above may be found in combination with other abuses, such as physical abuse and urination and defecation on the victim. In some cases, physical abuse is an integral part of the sexual abuse; in others, drugs and alcohol may be given to the victim.

It is important to note that physical signs may not be evident in cases of sexual abuse due to the nature of the abuse and/or the fact that the disclosure was made some time after the abuse took place.

Carers and professionals should be alert to the following physical and behavioural signs:

- bleeding from the vagina/anus;
- difficulty/pain in passing urine/faeces;
- an infection may occur secondary to sexual abuse, which may or may not be a definitive sexually transmitted disease. Professionals should be informed if a child has a persistent vaginal discharge or has warts/rash in genital area;
- noticeable and uncharacteristic change of behaviour;
- hints about sexual activity;
- age-inappropriate understanding of sexual behaviour;
- inappropriate seductive behaviour;
- sexually aggressive behaviour with others;
- uncharacteristic sexual play with peers/toys;
- unusual reluctance to join in normal activities that involve undressing, e.g. games/swimming.

Particular behavioural signs and emotional problems suggestive of child abuse in **young children (aged 0-10 years)** include:

- mood change, e.g. child becomes withdrawn, fearful, acting out;
- lack of concentration, especially in a educational setting;
- bed wetting, soiling;
- pains, tummy aches, headaches with no evidence of physical cause;
- skin disorders;
- reluctance to go to bed, nightmares, changes in sleep patterns;
- school refusal;
- separation anxiety;
- loss of appetite, overeating, hiding food.

Particular behavioural signs and emotional problems suggestive of child abuse in **older children (aged 10+ years)** include:

- depression, isolation, anger;
- running away;
- drug, alcohol, solvent abuse;
- self-harm;
- suicide attempts;
- missing school or early school leaving;
- eating disorders;

All signs/indicators need careful assessment relative to the child's circumstances.

APPENDIX 3

Safeguarding Children Recording Form (Template)

1. Details of Person Completing the Form

Name: _____ Date of Birth: _____

Tel.: _____ Mobile: _____

Email: _____

Current Position: _____

Holy Faith Sisters Congregation or Organisation: _____

2. About the Disclosure

When was the disclosure made or concern expressed?

Date: _____ Time: _____

How was information received?

Telephone

Letter

Email

In person

Attach any written information to this form.

3. Details of Person Making Disclosure or Raising Concern

Name: _____

Address: _____

Tel.: _____ Mobile: _____

Email: _____

Relationship to alleged victim _____

4. Details of Alleged Victim

Name: _____

Address: _____

Tel.: _____ Mobile: _____

Ethnic origin _____

Language (is interpreter/ signer needed): _____

Disability: _____

Special needs: _____

Parish/ Order (if applicable) _____

5. Parent or Guardian Details (where appropriate)

Name: _____

Address (if different from above): _____

Tel.: _____ Mobile: _____

Are they aware of the allegation and suspicion?

- Yes No

6. Details of Alleged Perpetrator

Name: _____

Address: _____

Tel.: _____ Mobile: _____

Relationship to alleged victim: _____

Position in Holy Faith Sisters Organisation: _____

Address at time of alleged incident(s): _____

Details (if known) of current appointments (either paid or voluntary) or current living arrangements that bring this person into contact with children:

Any additional information

7. Details of Allegation or Complaint

Date(s): _____

Time(s): _____

Location(s): _____

Witnesses (if any): _____

Does the alleged victim know this referral is being made?

8. Action Taken

Has the matter been referred to Designated Liaison Person?

Yes

No

If yes, please state:

Date: _____ Time: _____

If no explain why:

Details of person to whom it was referred:

Name: _____

Designation: _____

Address: _____

Tel.: _____ Mobile: _____

Email: _____

**9. Next Steps
(Responsibility rests with the Designated Liaison Person)**

What actions were agreed and by whom when the matter was referred:

a) onto civil authority?

b) onto the Regional leader?

Are there any immediate Safeguarding Children concerns? If so please record what they are and state what actions have been taken by whom to address them:

10. Designated Liaison Person Details:

Date form sent: _____

Form completed:

Date: _____ Time: _____

Signed: _____

(A copy must be retained by the Local Safeguarding Representative and filed in a secure location, and a copy must be sent to the Designated Liaison Person for forwarding to the civil/ statutory authorities)

APPENDIX 4

Standard Reporting Form to be used when reporting to TUSLA

TUSLA An Ghníomhaireacht um Leanaí agus an Teaghlach
Child and Family Agency

FORM NUMBER: CC01:01:01

STANDARD REPORT FORM

(For reporting CP&W Concerns)

A. To Principal Social Worker/Designate: _____

1. Date of Report

2. Details of Child

| | | | | | |
|-----------|----------------------|---------------------------------------|--------------------------|--------|--------------------------|
| Name: | <input type="text"/> | Male | <input type="checkbox"/> | Female | <input type="checkbox"/> |
| Address: | <input type="text"/> | DOB | <input type="text"/> | Age | <input type="text"/> |
| | | School | <input type="text"/> | | |
| Alias | <input type="text"/> | Correspondence address (if different) | <input type="text"/> | | |
| Telephone | <input type="text"/> | Telephone | <input type="text"/> | | |

3. Details of Persons Reporting Concern(s)

| | | | |
|-------------------------------------|--------------------------|---|--------------------------|
| Name: | <input type="text"/> | Telephone No. | <input type="text"/> |
| Address: | <input type="text"/> | Occupation | <input type="text"/> |
| | | Relationship to client | <input type="text"/> |
| Reporter wishes to remain anonymous | <input type="checkbox"/> | Reporter discussed with parents/guardians | <input type="checkbox"/> |

4. Parents Aware of Report

| | | | |
|--|----------------------|------------------------------|-----------------------------|
| Are the child's parents/carers aware that this concern is being reported | - Mother | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| | - Father | <input type="checkbox"/> | <input type="checkbox"/> |
| Comment | <input type="text"/> | | |

5. Details of Report

(Details of concern(s), allegation(s) or incident(s) dates, times, who was present, description of any observed injuries, parent's view(s), child's view(s) if known.)



An Ghníomhaireacht um
Leanaí agus an Teaghlach
Child and Family Agency

FORM NUMBER: CC01:01:01

STANDARD REPORT FORM

(For reporting CP&W Concerns)

6. Relationships

| Details of Mother | | Details of Father | |
|-------------------------------------|--|-------------------------------------|--|
| Name: | | Name: | |
| Address: (if different to child) | | Address: (if different to child) | |
| Telephone No's: | | Telephone No's: | |

7. Household composition

| Name | Relationship | DOB | Additional Information e.g. School/ Occupation/Other: |
|------|--------------|-----|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

8. Name and Address of other personnel or agencies involved with this child

| | Name | Address |
|----------------------|------|---------|
| Social Worker | | |
| PHN | | |
| GP | | |
| Hospital | | |
| School | | |
| Gardaí | | |
| Pre-School/Crèche/YG | | |
| Other (specify): | | |
| | | |
| | | |
| | | |
| | | |

9. Details of person(s) allegedly causing concern in relation to the child

| | | | | | | | |
|------------------------|--|-----|--|------------|--------------------------|--------|--------------------------|
| Relationship to child: | | Age | | Male | <input type="checkbox"/> | Female | <input type="checkbox"/> |
| Name: | | | | Occupation | | | |
| Address: | | | | | | | |

10. Details of person completing form

| | | | |
|----------|--|-----------------|--|
| Name: | | Occupation: | |
| Address: | | Telephone No's: | |
| Signed | | Date: | |

APPENDIX 5

Checklist for Safeguarding Children Policy taken from NBSCCCI Standards

Standard 1: A written Policy on Keeping Children Safe

| | | In Place | Proposed | Not in Place | Date Reviewed |
|---|--|----------|----------|--------------|---------------|
| 1 | Our organisation has a Safeguarding Children policy that is written in a clear and easily understandable way. | | | | |
| 2 | The policy is approved and signed by the relevant leadership body of our organisation. | | | | |
| 3 | The policy states that all relevant personnel are required to comply with it. | | | | |
| 4 | The policy is subject to review at a minimum every three years and will be adapted whenever there are significant changes in our organisation or in legislation. | | | | |
| 5 | The policy addresses Safeguarding Children in the different aspects of our work (for example within a building, in Congregation work, training programmes, pilgrimages, trips and holidays) | | | | |
| 6 | The policy states how those individuals who pose a risk to children are managed. | | | | |
| 7 | The policy clearly describes the understanding and definitions of abuse. | | | | |
| 8 | The policy states that all current Safeguarding Children concerns must be reported to the civil authorities without delay. | | | | |
| 9 | The Policy has been created at Regional level. Where a separate policy document at any other level is necessary it is a requirement that it be consistent with the Regional policy and approved by the relevant authority before distribution. | | | | |

Standard 2: Procedures - How to Respond to Safeguarding Children Allegations and Suspicions

| | | In Place | Proposed | Not in Place | Date Reviewed |
|----------|--|-----------------|-----------------|---------------------|----------------------|
| 1 | There are clear, written Safeguarding Children procedures that provide step-by-step guidance on what action to take where there are allegations or suspicions of abuse of a child (current or historic). | | | | |
| 2 | The Safeguarding Children procedures are consistent with legislation on child welfare and civil guidance for Safeguarding Children and are written in a clear and easily understandable way. | | | | |
| 3 | There is a Regional Designated Liaison Person with clearly defined responsibilities for Safeguarding Children. In every Holy Faith ministry in Ireland, there is a local Safeguarding Representative who has a clearly- defined role and specified responsibilities for Safeguarding Children. | | | | |
| 4 | There is a process for recording incidents, allegations and suspicions and referrals and storing these securely, so that confidential information is protected and treated in a manner that complies with relevant legislation. | | | | |
| 5 | There is a process for dealing with complaints made by adults and children about unacceptable behaviour towards children, with clear timescales for resolving the issues raised by the complaint. | | | | |
| 6 | There is guidance on confidentiality and information-sharing which makes clear that the protection of the child is the most important consideration. | | | | |
| 7 | The procedures include contact details for local statutory Safeguarding Children ministries (in the Republic of Ireland the local TUSLA and An Garda Síochána; in Northern Ireland the local DHSSPS and the PSNI). | | | | |

Standard 3: Preventing Harm to Children

| | | In Place | Due By | Not in Place | Date Reviewed |
|-----------|---|-----------------|---------------|---------------------|----------------------|
| 1 | There are clear, written Safeguarding Children procedures that provide step-by-step guidance on what action to take where there are allegations or suspicions of abuse of a child (current or historic). | | | | |
| 2 | The safe recruitment and vetting policy is in line with best practice guidance. | | | | |
| 3 | All those who have the opportunity for regular contact with children, or who are in a position of trust are required to complete a form declaring court convictions and to undergo other checks as required by legislation and guidance and all such information is properly assessed and recorded. | | | | |
| 4 | Our organisation provides guidance on appropriate and expected standards of behaviour of adults towards children. | | | | |
| 5 | There is guidance on expected and acceptable behaviour of children towards other children, including anti bullying policy. | | | | |
| 6 | There are clear ways in which personnel (Holy Faith Sisters, employees and volunteers) can bring to attention allegations and suspicions concerning unacceptable behaviour towards children by other personnel. | | | | |
| 7 | Processes are in place for dealing with unacceptable behaviour by children; these processes to not involve physical punishment or any other form of degrading or humiliating treatment. | | | | |
| 8 | Guidance to staff and children makes it clear that discriminatory behaviour or language in relation to any of the following is not acceptable: race, culture, age, gender, disability, religion, sexuality or political views. | | | | |
| 9 | Policies include guidelines on the personal care of children with disabilities, including appropriate and inappropriate touch. | | | | |
| 10 | There is guidance on assessing all possible risks when working with children - especially in activities that involve time spent away from home. | | | | |
| 11 | Guidance is in place to ensure that children participating in project and activities provided by Holy Faith Sisters communities and ministries are adequately supervised and protected at all times. | | | | |

| | | | | | |
|-----------|--|--|--|--|--|
| 12 | Guidelines exist for appropriate use of information technology (such as mobile phones, email, digital cameras, websites, internet) to ensure that children are not exposed to abuse, exploitation or harm of any kind. | | | | |
|-----------|--|--|--|--|--|

Standard 4: Training and Education

| | | In Place | Proposed | Not in Place | Date Reviewed |
|----------|---|-----------------|-----------------|---------------------|----------------------|
| 1 | All personnel (Holy Faith Sisters, employees and volunteers) are inducted into our policy and procedures on Safeguarding Children. | | | | |
| 2 | Those working with children are provided with appropriate training for keeping children safe and with regular opportunities to update their skills and knowledge. | | | | |
| 3 | In addition to the Designated Liaison Person and Local Safeguarding Representative, training is provided for those with additional responsibilities such as recruiting and selecting staff, dealing with complaints, disciplinary processes or managing risk. | | | | |
| 4 | Training is provided for Holy Faith Sisters who are in formation. | | | | |
| 5 | Training programmes are monitored by the Region and updated in line with current legislation, guidance and best practice. | | | | |

Standard 5: Communicating the Safeguarding Message

| | | In Place | Proposed | Not in Place | Date Reviewed |
|----------|---|-----------------|-----------------|---------------------|----------------------|
| 1 | The Safeguarding Children policy is openly displayed and available to everyone. | | | | |
| 2 | Children are made aware of their right to be safe from abuse and who to speak to if they have concerns. | | | | |
| 3 | All Holy Faith Sisters and all employees and volunteers know the name and the contact details of the Designated Liaison Person. | | | | |
| 4 | Personnel (Holy Faith Sisters, employees and volunteers) are provided with contact details of local statutory Safeguarding Children ministries , (TUSLA and An Garda Síochána in the Republic of Ireland; the local DHSSPS and the PSNI in Northern Ireland) and of telephone help-lines. | | | | |
| 5 | Our organisation establishes links with statutory Safeguarding Children agencies in order to keep children safe. | | | | |
| 6 | Our organisation has an established communications policy which reflects a commitment to transparency and openness. | | | | |

Standard 6: Access to Advice and Support

| | | In Place | Proposed | Not in Place | Date Reviewed |
|----------|---|-----------------|-----------------|---------------------|----------------------|
| 1 | Personnel with special responsibilities for keeping children safe have access to specialist advice, support and information on Safeguarding Children. | | | | |
| 2 | Contacts have been established at a national and local level with the relevant Safeguarding Children and welfare agencies that can provide information, support and assistance to children and personnel. | | | | |
| 3 | There is guidance on how to respond to and support a person who it is alleged has been the victim of child abuse, whether that person is a child or an adult abused in childhood. | | | | |
| 4 | Information and appropriate support is provided to those who have experienced abuse. | | | | |
| 5 | Appropriate support is provided to those who have perpetrated abuse to help them to face up to the reality of the abuse for which they are responsible and to prevent further abuse. | | | | |

Standard 7: Implementing and monitoring the Standards

| | | In Place | Proposed | Not in Place | Date Reviewed |
|----------|--|-----------------|-----------------|---------------------|----------------------|
| 1 | There is a written plan showing the steps that will be taken to keep children safe, who is responsible for implementing these measures and when these will be completed. | | | | |
| | The organisation has made available the personnel and financial resources necessary for implementing the plan. | | | | |
| | Arrangements are in place to monitor compliance with Safeguarding Children policies and procedures. | | | | |
| | Processes are in place to enable children, as well as parents and guardians, make known their views on policies and practices for keeping children safe. | | | | |
| | A record of all incidents, allegations and suspicions of abuse is made without delay and is stored securely. | | | | |

APPENDIX 6

Extract from *Criminal Justice (withholding of Information on Offences Against Children and Vulnerable Persons) Act 2012*

Offences against children for purposes of offence under *section 2*

1. Murder.
2. Manslaughter.
3. Common law offence of false imprisonment.
4. Rape.
5. Rape under section 4 of the Criminal Law (Rape) (Amendment) Act 1990 .
6. Sexual assault.
7. Aggravated sexual assault within the meaning of section 3 of the Criminal Law (Rape) (Amendment) Act 1990 .
8. An offence under section 1 of the Punishment of Incest Act 1908 (incest by males).
9. An offence under section 2 of the Punishment of Incest Act 1908 (incest by females of or over 17 years of age).
10. An offence under section 6 (1) of the Criminal Law (Sexual Offences) Act 1993 .
11. An offence under section 2 of the Criminal Law (Sexual Offences) Act 2006 (defilement of child under 15 years of age).
12. An offence under section 3 of the Criminal Law (Sexual Offences) Act 2006 (defilement of child under the age of 17 years).
13. An offence under either of the following provisions of the Child Trafficking and Pornography Act 1998 —
 - (a) section 3 (child trafficking and taking, etc., child for sexual exploitation),
 - (b) section 4 (allowing child to be used for child pornography).
14. An offence under section 2 of the Sexual Offences (Jurisdiction) Act 1996 insofar as it relates to an offence specified in the Schedule to that Act that is also specified in this Schedule.
15. An offence under any of the following provisions of the Criminal Law (Human Trafficking) Act 2008 —
 - (a) section 2 (trafficking, etc., of children),
 - (b) section 5 insofar as it relates to a child who has been trafficked for the purpose of his or her exploitation (soliciting or importuning for purposes of prostitution of trafficked person),
 - (c) section 7 insofar as it relates to an offence under section 2 of that Act or section 3 (other than subsections (2A) and (2B)) of the Child Trafficking and Pornography Act 1998 .
16. An offence under section 249 of the Children Act 2001 (causing or encouraging sexual offence upon a child).
17. An offence under section 176 of the Criminal Justice Act 2006 (reckless endangerment of children).
18. An offence under any of the following provisions of the Non-Fatal Offences against the Person Act 1997 —
 - (a) section 3 (assault causing harm),
 - (b) section 4 (causing serious harm),
 - (c) section 5 (threats to kill or cause serious harm),

- (d) section 13 (endangerment),
- (e) section 15 (false imprisonment),
- (f) section 16 (abduction of child by parent, etc.),
- (g) section 17 (abduction of child by other persons).

19. An offence under section 246 of the Children Act 2001 (cruelty to children).
20. An offence under any of the following provisions of the Criminal Justice (Female Genital Mutilation) Act 2012 —
 - (a) section 2 (offences of female genital mutilation, etc.),
 - (b) section 3 (offence of removal from State for purpose of female genital mutilation),
 - (c) section 4 (acts, etc., done outside State).

Offences Against Vulnerable Persons for the purposes of an offence under Section 3

1. Common law offence of false imprisonment.
2. Rape.
3. Rape under section 4 of the Criminal Law (Rape) (Amendment) Act 1990 .
4. Sexual assault.
5. Aggravated sexual assault within the meaning of section 3 of the Criminal Law (Rape) (Amendment) Act 1990 .
6. An offence under section 1 of the Punishment of Incest Act 1908 (incest by males).
7. An offence under section 2 of the Punishment of Incest Act 1908 (incest by females of or over 17 years of age).
8. An offence under either of the following provisions of the Criminal Law (Sexual Offences) Act 1993 —
 - (a) subsection (1) of section 5 insofar as it provides for an offence of having sexual intercourse, or committing an act of buggery, with a person who is mentally impaired within the meaning of that section (other than a person to whom the alleged offender is married or to whom he or she believes with reasonable cause he or she is married),
 - (b) subsection (2) of section 6 insofar as it provides for an offence of soliciting or importuning a person who is mentally impaired within the meaning of that section (whether or not for the purposes of prostitution) for the purposes of the commission of an act that would constitute an offence under section 5(1) (insofar as it is referred to in *paragraph (a)*) of that Act or an offence referred to in section 2 of the Criminal Law (Rape) (Amendment) Act 1990 .
9. An offence under section 2 of the Sexual Offences (Jurisdiction) Act 1996 insofar as it relates to an offence specified in the Schedule to that Act that is also specified in this Schedule to the extent that it is so specified.
10. An offence under any of the following provisions of the Criminal Law (Human Trafficking) Act 2008 —
 - (a) section 4 (trafficking of persons other than children),
 - (b) section 5 insofar as it relates to a person in respect of whom an offence under subsection (1) or (3) of section 4 of that Act has been committed (soliciting or importuning for purposes of prostitution of trafficked person),
 - (c) section 7 insofar as it relates to an offence under section 4 of that Act.
11. An offence under section 3 of the Non-Fatal Offences against the Person Act 1997 (assault causing harm).

APPENDIX 7

How to handle an Allegation against a member of the Congregation

This guidance should be followed once the reporting procedures outlined in Section 2 of this Policy have been initiated. The Regional Leader shall (in consultation with and following the advices and recommendations of the DLP):

1. Assess promptly and carefully any allegation/report received, it should be assessed promptly and carefully.
2. Remember that the welfare of the child is paramount, and this be recalled at all times to ensure that there is no delay in reporting under the reporting procedures outlined in Section 2.
3. As a first priority ensure that the child or young person is not exposed to any unnecessary risk.
4. As a matter of urgency, take any necessary protective measures. These measures shall be proportionate to the level of risk and shall not unreasonably penalise the Sister, financially or otherwise, unless necessary to protect children.
5. Ensure that the DLP (or the Deputy DLP where the DLP is unavailable or cannot act) takes full responsibility for making a report to the civil authorities in line with the reporting procedures set out in Section 2 of this Policy.
6. Ensure that action is taken in reporting an allegation of child abuse against a Holy Faith Sister shall be based on an opinion formed “reasonably and in good faith”.
7. Consider the duties and activities of the accused. If the Holy Faith Sister is in a teaching role, Tusla/An Garda Siochana should be immediately asked in writing to communicate the report to the school in which the Sister is teaching and to advise the school on the appropriate child safeguarding measures to be taken.
8. Consider whether the Holy Faith Sister needs to be stepped aside from Ministry.
9. Consider whether a written Precept needs to be put in place, pending the outcome of the civil investigation and any consequential internal or canonical investigation.
10. Obtain the advices of the NBSCCCI.
11. Consider appropriate pastoral response to the wider Congregation.
12. Consider whether any public statement needs to be made in relation to stepping aside from ministry (if applicable).
13. Meet with the person against whom the complaint has been made.
14. Inform the accused that a complaint has been made against her.
15. Inform her of her rights e.g Right to silence, Right to representation i.e. canon or civil lawyer, Right to the support of her Congregation.
16. Advise the Holy Faith Sister that in the event of a disclosure/admission being made, same will be passed on to the civil authorities.
17. Put the kernel of the allegation to her and inform her who made it.
18. Ask her if she wants to make a comment, having been informed of the allegation.
19. Inform her of the proposed action by the Congregation in accordance with the procedures which are in place.
20. In the case of an unjust accusation assure her that every effort will be made to restore her good name.
21. Take a full, detailed note of the meeting, and ask the accused Sister to sign same as an accurate reflection of what has been discussed at the meeting.
22. Assure her of the availability of counselling and support.
23. Offer her the support of an Advisor * See note below.
24. Sisters may be subjected to erroneous or malicious allegations. Therefore any allegation of abuse should be dealt with sensitively and support provided for the Sister including counselling where necessary. The primary goal is to protect the child while taking care to treat the Sister fairly.

25. At the conclusion of the statutory investigation including but not limited to the conclusion of any civil law court proceedings and appeals (or where the civil authorities have informed the Congregation that they will not be investigating the matter) an internal investigation will be mounted where there are disciplinary or child protection matters to consider. The requirements of Canon Law will be observed.
26. In cases where there has been an acquittal pursuant to a civil prosecution or where there was a decision not to prosecute by the Gardai or the DPP, there may nonetheless be sufficient evidence to meet the civil standard of proof of the concern/allegation that has been made. The Regional Leader will consider the continued role of the Sister carefully.
27. The Regional Leader may obtain the advice of a Canon Lawyer in relation to the canonical process and any preliminary investigation as may be required pursuant to same. A further written Precept may be put in place, as appropriate.
28. A report may be made to the CDF as appropriate.

During and subsequent to the above steps, pastoral concern must be shown to everyone involved: the complainant and his or her family, the accused, her family and Congregation, as well as the broader local Congregation.

* The Role of the Advisor is as follows:

- Appointed by the Regional Leader, the Advisor is to be available to the person about whom a child protection concern, report, suspicion, disclosure or allegation has been made
- The Adviser should be available to the accused Sister and should have regard to all pastoral, legal and therapeutic issues.
- The Advisor shall ensure that the accused is legally represented by an independent civil lawyer (and canon lawyer if necessary).
- The role of the Advisor is to represent the needs of the alleged abuser and assist, where appropriate, with communication with the DLP and the Regional Leader.
- The Advisor shall help the alleged abuser identify therapeutic needs (including counselling) and to face up to the abuse as well as to promote healing in a manner which does not compromise children's safety.

APPENDIX 8

How to handle an allegation against an Employee or Volunteer (but not a member of the Congregation)

In the event of an allegation, disclosure (historic, current or anonymous), concern or suspicion of child abuse being made against an employee or volunteer, the protection of the child or young person is the paramount consideration. The first priority is to ensure that no child is exposed to unnecessary risk. These kinds of allegations constitute a very serious concern for the Holy Faith Sisters. The following steps will be taken:

1. When a concern/suspicion/allegation/disclosure/report is received, it should be assessed promptly and carefully.
2. The welfare of the child is paramount, and this be recalled at all times to ensure that there is no delay in reporting under the reporting procedures outlined in Section 2 of the Policy.
3. The first priority is to ensure that the child or young person is not exposed to any unnecessary risk.
4. The Holy Faith Sisters will, as a matter of urgency, take any necessary protective measures. These measures shall be proportionate to the level of risk and shall not unreasonably penalise the employee, financially or otherwise, unless necessary to protect children.
5. The DLP (or the Deputy DLP where the DLP is unavailable or cannot act) will take full responsibility for making a report to the civil authorities in line with the reporting procedures set out in Section 2 of this Policy.
6. Action taken in reporting an allegation of child abuse against an employee or volunteer shall be based on an opinion formed “reasonably and in good faith”.
7. Two separate people (neither of whom shall be the DLP and/or the Deputy DLP) must be assigned to the matter.
 - One person will be allocated to provide support to the complainant (the “**Support Person**”). For more information in relation to the role and responsibility of the Support Person, see Section 2.
 - One person will be allocated to provide support to the employee, and attend as a support person during their meetings with Tusla/An Garda Siochana. Note: This person shall not be considered the same as an “Advisor” (see Appendix 7).
8. The Regional Leader will take responsibility for implementing the provisions of any Disciplinary Procedure, although that Disciplinary Procedure may be “paused” pending the conclusion of any investigation/assessment being conducted by Tusla and/or An Garda Siochana. The Regional Leader may delegate this role to another individual within the Holy Faith Sisters, including but not limited to the employee/volunteer’s line manager.
9. The Regional Leader (and/or her delegate) will arrange a private meeting with the employee as soon as possible to privately inform them of:
 - The fact that an allegation has been made against him/her
 - The nature of the allegation.
10. Advise the employee/volunteer that in the event of a disclosure/admission being made, same will be passed on to the civil authorities.
11. The employee/volunteer should be given an opportunity to respond.
12. The response of the employee/volunteer shall be noted, and passed on to Tusla (and/or An Garda Siochana) if a formal report is being made.
13. All stages of the process must be fully and carefully recorded. These records must be prepared, stored and maintained in accordance with the procedures outlined in this Policy.
14. Any action following an allegation against an employee/volunteer should be taken in consultation with Tusla and the Gardaí.
15. The Holy Faith Sisters will take care to ensure that actions taken by them do not undermine or frustrate any investigation/assessments conducted by Tusla or An Garda Siochana. Through the DLP, the Holy Faith Sisters will maintain a close liaison with the civil authorities to achieve this.

16. Where an investigation/assessment is being conducted by a statutory authority, the Holy Faith Sisters will in the first instance consider whether placing the individual on administrative leave with pay, pending the conclusion of the investigation/assessment being carried out by the civil authorities.
17. While the matter is pending the respondent enjoys the presumption of innocence and the right to his or her good name.
18. Staff/volunteers may be subjected to erroneous or malicious allegations. Therefore any allegation of abuse should be dealt with sensitively and support provided for the employee/volunteer including counselling where necessary. The primary goal is to protect the child while taking care to treat the employee/volunteer fairly.
19. The Holy Faith Sisters will ensure that any action taken should be guided by agreed procedures (if any), the employee's employment contract, and the rules and principles of natural justice.
20. The accused employee/volunteer must be informed of actions planned and taken.
21. In some cases, it may be necessary to seek legal advice.

APPENDIX 9

Role and Responsibility of (1) DLP, (2) Deputy DLP and (3) Local Safeguarding Representative

Role and Responsibility of DLP and Deputy DLP

The DLP is the person appointed by Holy Faith Sisters in Ireland to receive allegations of child abuse. The DLP has been appointed by the Regional Leader. Where the DLP is unavailable, or unable to act, the role and responsibilities will be fulfilled by the Deputy DLP. The DLP and Deputy DLP have a clearly defined role and responsibility for safeguarding children. The name and contact details of the DLP (and the Deputy DLP) shall be clearly displayed in the foyer/reception area of each Holy Faith Sisters house and/or property, together with a copy of this Policy, and both shall be available on the Holy Faith Sisters website.

Having a thorough knowledge of the policy and correct procedure it is the DLP's role and responsibility to:

1. Receive information about a child protection concern, suspicion, allegation or disclosure (current, historical or anonymous) involving a Holy Faith Sister, or any third party, including but not limited to an employee of the Congregation and/or a volunteer.
2. To report all concerns, suspicions, allegations or disclosures (current, historical or anonymous) to the civil authorities immediately strictly in line with the procedures set out in Section 2 and to manage any subsequent internal investigations.
3. To inform the Regional Leader of all reports made to the civil authorities
4. To liaise with civil authorities and the NBSCCCI where issues relating to child protection arise.
5. When the investigation by the civil authorities has been completed, the DLP will manage any subsequent internal investigations.
6. Assist, support and advise the Regional Leader on how to deal with and manage all disciplinary matters relating to the continuing employment and/or voluntary services of an employee or volunteer who is the subject of an allegation. See Appendix 8.
7. Assist, support and advise the Regional Leader on how to deal with and manage the risk relating to a Holy Faith Sister who is the subject of a child protection concern, suspicion, allegation or disclosure (current, historical or anonymous), in particular stepping aside from Ministry, putting written Precepts in place, and notifying the CDF in appropriate cases. See Appendix 7.
8. To make recommendations to the Regional Leader about any immediate action(s) that may need to be taken in order to ensure the safety of children and to manage any potential risk.
9. To act as a resource to any Holy Faith Sister, employee or volunteer who has child protection concerns.
10. To ensure that the reporting procedure set out in Section 2 hereof is followed.
11. To ensure that suspected cases of child neglect or child abuse are referred immediately and fully to the designated person in TUSLA or in the event of an emergency and the unavailability of the Local Social Worker, to An Garda Siochana.
12. Certain offences against children and vulnerable adults are subject to mandatory reporting to the Gardai. The DLP must ensure that in the event that the suspected case of child neglect or child abuse constitutes an offence against a child or vulnerable person under the Criminal Justice (Withholding of Information on Offences Against Children and Vulnerable Persons) Act 2012, (as summarised in Appendix 6), that a report is made to An Garda Siochana without delay.
13. To ensure that all relevant records are shared with and/or made available to Tusla and/or An Garda Siochana when a child welfare or child protection issue arises.

14. To ensure that the Holy Faith Sisters cooperate fully with the civil authorities, including attending at child protection and child welfare meetings as may be organised by Tusla (including but not limited to Child Protection Case Conferences and Strategy Meetings) in order to share information and contribute to good decision making.
15. To ensure that they are knowledgeable about child protection and undertake any training and refresher courses as may be necessary to keep themselves updated on new developments, and to update their skills and knowledge.
16. To promote awareness of this Policy and the procedures set out therein, and the Congregation's safeguarding message.
17. To assess the training needs of each individual in the Irish Region of the Congregation by way of a training-needs audit at least every 12 months.
18. To meet with (either in groups or individually) all those listed on the audit form and brief them on best practice and procedures in regard to preventing harm to children.
19. The DLP shall be accessible to everyone associated with the Congregation and will be supported by training and supervision.

Role and Responsibility of Local Safeguarding Representative

1. Each Holy Faith Congregation house/cluster and ministry will appoint a "Local Safeguarding Representative" to promote the safeguarding message within that Congregation or ministry.
2. The Local Safeguarding Representative will act as a point of contact and to liaise with the DLP as necessary.
3. The Local Safeguarding Representative shall immediately contact their Director/Chairperson (if applicable) and the DLP in accordance with Section 2 if an allegation or suspicion is raised.
4. The Local Safeguarding Representatives will be provided with induction, support and regular training.
5. The role of each Local Safeguarding Representative will be to promote the Congregation's Policy on safeguarding of children by:
 - Raising awareness of what safeguarding is.
 - Disseminating information on and promoting awareness of *Holy Faith Sisters Policy on Safeguarding Children*.
 - Ensuring that all activities operate in a manner which ensures the safety and well-being of the children involved.
 - Ensure that those responsible for running activities with children are aware of safe procedures and know how to report any incident that causes concern.
 - Ensuring that the contact details of the Designated Liaison Person are widely publicised and prominently displayed in each property, together with a copy of this Policy.
6. The overall responsibility for safeguarding children remains with the person in charge, such as the Local leader, Director or Chairperson.
7. Any safeguarding concerns raised with a Local Safeguarding Representative shall be dealt with in accordance with the reporting procedures detailed in Section 2.

APPENDIX 10

“Recording Incidents, Allegations, Suspicions and Referrals”

The following procedures apply to all child protection records held by the Holy Faith Sisters (including but not limited to allegations, suspicions/concerns, third party information, disclosures (either current, historic or anonymous):

1. Create a child protection case file for every referral that includes a log of actions, events and information received strictly in line with the NBSCCCI Case File Template.
2. Entries should be made as soon as possible after the event but before the end of the day.
3. All entries must be timed, dated and signed by the author.
4. The DLP shall take possession of any written records made by any person in connection with the case and place them on the Child Protection Case File.
5. All child protection documents shall be stored securely.
6. Records must be prepared contemporaneously or as soon as possible after an incident or meeting.
7. must be signed by the person who prepared them, and dated.
8. Record must be recorded carefully, preferably typed but in any event using clear handwriting.
9. Personal information is recorded and stored confidentially and may only be accessed by the DLP, the Deputy DLP, the Regional Leader and other members of the Irish Regional Leadership Team on a “need to know” basis. Access to the files is limited to those who either need to know about the information in those records and/or who have a responsibility to manage the records/files.
10. The records may be accessed to third parties including An Garda Síochána, TUSLA, NCMRG, and legal advisors in order for the Holy Faith Sisters to discharge their legal duties to safeguard children, to report offences, defend litigation and/or to obtain advice and assistance in relation to safeguarding matters.
11. Information is shared on a need-to-know basis in the best interests of the child with the relevant civil authorities (ie Tusla and An Garda Síochána). The Holy Faith Sisters have a clear policy on co-operating fully with Tusla and An Garda Síochána on the sharing of their records where a child welfare or child protection issue arises. This includes a clear commitment on the part of the DLP to attending at child protection and child welfare meetings as may be organised by Tusla (including but not limited to Child Protection Conferences and Strategy Meetings) in order to share information and contribute to good decision making.
12. Physical records will be stored in a locked filing cabinet located in a room to which only the DLP and/or the Deputy DLP and/or the Regional Leader have a key. This room is locked when the room is not in use by any of those parties.
13. Electronic records (including those in email form, documents/records stored on a computer, stored on a USB stick, or stored on any other portable format) are password protected and encrypted with an appropriate level of encryption software.
14. It is important that all sensitive or confidential materials are retained in a case file and stored securely.
15. Files containing sensitive or confidential data should be locked away and access to the relevant fire proof safe(s) or filing cabinets and keys should be strictly controlled.
16. Any information of a sensitive/confidential nature if stored electronically must always be password-protected. It is recommended to have two backup copies.
17. Where the DLP is resigning or being replaced, a hand-over protocol will be put in place to ensure that all relevant information is passed from one DLP to their successor.

18. There may be occasions when Child Protection Records may have to be taken out of the secure filing system referred to above, eg. to attend a Tusla Care Conference relating to a particular case. Child Protection Records may not be taken out of the building unless the Regional Leader has given her prior written permission for this to happen, and practical and robust security arrangements are put in place to preserve the confidentiality and security of the records.
19. No undertaking regarding secrecy can be given. This must be made clear to all parties involved. However, all legal requirements will be followed with regard to keeping information confidential. For the avoidance of any doubt, the provision of information to the statutory agencies for the protection of a child is not a breach of confidentiality, a breach of privacy, or a breach of data protection. Giving confidential information to others for the protection of a child or young person is not considered a breach of confidentiality.
20. The Holy Faith Sisters recognise the importance of preserving people's rights to confidentiality. We are committed to maintaining a strict code of confidentiality. However, in relation to child protection and welfare we acknowledge that confidential information must be shared with civil authorities in order to serve the best interests of the child or young person. However, in relation to child protection and welfare we undertake that: Information will be forwarded on a 'need to know' basis in order to safeguard the child.
21. All records kept in relation to the Holy Faith Sisters' handling of any child-protection matter (including correspondence, notes of meetings/discussions, incident report logs etc) shall be treated as highly confidential and stored securely in the DLP's secure filing system (as detailed above). Where the documents are stored electronically (i.e. on a computer, on a USB stick) they must be password protected and have an adequate level of encryption.
22. Parents/Guardians, children and young people have the right to know if personal information is being shared, unless doing so could put the child at further risk. The DLP who intends to make a report should inform the parents or guardians that a report is being submitted to Tusla or to An Garda Siochana, **unless doing so is likely to endanger the child**. When informing the parents/guardians, the DLP should not disclose any names or details capable of identifying the person against whom the complaint/report has been made, as this may lead to a claim under the Defamation Act 2009. The DLP shall inform the parent/guardian of the name and contact details of the relevant person dealing with the report in Tusla/An Garda Siochana. The Tusla/An Garda Siochana may decide to disclose the name and detail of the person against whom the complaint/report has been made to the parent/guardian of the child/young person concerned.
23. Every measure will be taken in order to ensure that the confidentiality and welfare of victims are prioritised above every other consideration.
24. Freedom of Information legislation does not apply to the Holy Faith Sisters.
25. Data Protection Acts: the Holy Faith Sisters are a data controller for the purposes of the Data Protection Acts 1988 and 2003 (as amended).
26. All records relating to child protection will be stored indefinitely and will not be destroyed. The levels of security and confidentiality set out above will apply to all child protection records, regardless of how old they are or when they were created. As a general rule of thumb, the Irish Region of the Holy Faith Sisters shall retain all case management files and safeguarding records for a period of 100 years.
27. All other records pertaining to safeguarding (eg. training-needs audits, checklists, etc) should be stored for a period of 20 years unless there is a legitimate reason for retaining them past this period.

28. When situations become vacant those responsible in the Congregation have a responsibility to receive from each individual concerned, a completed “Disclosure of Criminal Convictions and Permission for Statutory Checks for those Working with Children” (See Appendix 19). The application forms, disclosure forms and all other documentation should be stored securely. Access will be restricted to the Regional Leader, the DLP and/or the Deputy DLP.
29. Other records with identifying personal information, e.g recruitment documents and vetting outcomes; Activity attendance records; consent forms; accident forms etc must be stored in a secure locked cabinet.
30. Images of a child will not be used for any reason without the consent of the parent/carer (however, we cannot guarantee that cameras/videos will not be used at public liturgies/events or events at which third parties such as other parents/carers are present).

APPENDIX 11

Complaints Procedure to be followed where there is a complaint relating to “Unacceptable Behaviour”

Note: this procedure is not to be used where the concern, suspicion, complaint, allegation, report, disclosure (current, historical and/or anonymous) relates to “child abuse”. This complaints procedure is to be used solely for incidents of “unacceptable behaviour”, eg. quality of services, accidents which may occur on Congregational grounds etc. It does **not** relate to child protection complaints. Complaints which relate to child protection issues will be dealt with under the reporting procedures outlined in Section 2. In addition, complaints from one employee/volunteer against another employee/volunteer (which do not raise child protection issues) will be dealt with under the Holy Faith Sisters Grievance Procedure or Disciplinary Procedure as set out within the employee’s Employee Handbook as appropriate, and will not be dealt with under this Complaints Procedure.

This Complaints Procedure must be brought to the attention of all members of the Congregation and all employees and volunteers.

If any person (having reached the age of 18) makes a verbal complaint to any member of the Congregation, employee or volunteer which is not related to child abuse, that member of the Congregation, employee or volunteer is obliged to inform the person that the Holy Faith Sisters have a Complaints Procedure in place for resolving complaints unrelated to child abuse, and shall direct them to the appropriate section of this Policy for further guidance. Where the complaint is raised by a child under the age of 18, all members of the Congregation, employees and/or volunteers should be willing to assist the child (in an age-appropriate manner) to explain how they can make a complaint under this Complaints Procedure and to obtain the assistance and support of their parent/guardian to do so.

Complaints Procedure: The procedure outlined below must be followed closely, and each stage carefully documented and detailed written notes taken retained. All complaints shall be recorded in writing.

Stage 1 – Informal

1. In the first instance, if an individual or a parent/guardian of a child (the “**Complainant**”) wishes to make a complaint against any member of the Congregation, employee and/or volunteer, they should raise their complaint directly with that person.
2. The member of the Congregation, employee and/or volunteer should use their best endeavours to resolve the complaint.

Stage 2 – Written Complaint

3. If the complaint is unresolved, or the Complainant is unhappy with the outcome, then the Complainant is entitled to make a complaint in writing. Only those complaints given in writing and signed by the individual or the parent/guardian will be investigated by the Holy Faith Sisters.
4. The Holy Faith Sisters will appoint a senior member of staff, unconnected with the complaint, to investigate the complaint.
5. The appointed senior member of staff shall bring the complaint to the attention of the member of the Congregation, employee and/or volunteer concerned and seek to resolve the matter between the parties to their mutual satisfaction.
6. Both the member of the Congregation, employee and/or volunteer and the Complainant shall be informed in writing of the outcome of the resolution process initiated by the appointed senior member of staff within 5 days of receipt of the written complaint outlined at (3) above.

Stage 3 – Management Investigation

7. If the complaint has not been resolved at Stage 2, and Complainant wishes to pursue the matter further, they should write to the Regional Leader outlining their continued objections.
8. The Regional Leader will consider the matter, and the Regional Leader shall inform the member of the Congregation, employee and/or volunteer that the investigation is proceeding to the next stage.
9. The member of the Congregation, employee and/or volunteer will be furnished with a copy of the written letter provided by the Complainant.
10. The member of the Congregation, employee and/or volunteer will be afforded an opportunity to make a presentation to the Regional Leader and can be accompanied by one person at that meeting, such person to be member of the Congregation, an employee and/or volunteer of the Holy Faith Sisters.
11. The Regional Leader may arrange a meeting with the Complainant if she considers it to be necessary.
12. The Regional Leader may consult with TUSLA and/or other external agencies for advice as appropriate.
13. Within 10 days of the receipt of the initial letter of complaint referred to at (7) above, the Regional Leader shall consider the matter and issue her decision in her absolute discretion. The decision of the Regional Leader shall be final.
14. The respondent will be informed of the outcome of the complaint within 5 days of the meeting referred to at (12) above.

APPENDIX 12

Responding to Reports/Concerns/Suspicious/Allegations/Disclosures (current, historical, and/or anonymous)

This section includes guidance on:

1. *How to react if someone comes to you with a report/concerns/a complaint*
2. *Giving Children the Confidence to Speak out*
3. *How to deal with a Complaint Received by Telephone*
4. *How to deal with concerns/reports received Anonymously, or from Third Parties (not the victim)*
5. *How to respond to retrospective disclosures by adults of child abuse when they were children*
6. *Asking Questions*
7. *Confidentiality – Do not promise to keep secrets*
8. *Recording*
9. *Ongoing Support for the Victim*
10. *Pastoral Meeting with the Victim*

1. How to react if someone comes to you with a report/concerns/a complaint

1.1. A person (including a child) may disclose abuse to a trusted adult. Children must be made aware of their right to be safe from abuse, and who to speak to if they have concerns.

1.2. Accordingly, it is important that all members of the Congregation, all employees and volunteers are aware and prepared for any disclosure from an adult or child. If any person comes to a member of the Congregation, an employee or a volunteer to disclose abuse, they should adhere to the following guidelines:

- a) Be as calm and natural as possible.
- b) Remember that you have been approached because you are trusted. Do not panic.
- c) Be aware that disclosures can be very difficult for the person.
- d) Remember, the complainant may initially be testing your reaction and may only open up fully over a period of time.
- e) Calm the person down, but be careful not to trivialise their concerns by playing down the gravity of the situation.
- f) Treat the person seriously.
- g) Listen to what the person has to say.
- h) Maintain a neutral approach.
- i) Give them the time and opportunity to tell you as much as they are able to tell you, and wish to tell you.
- j) Do not pressurise the person. Allow him or her to disclose at their own pace and in their own language.
- k) Conceal any signs of disgust, anger or disbelief.
- l) Accept what the person has to say – false disclosures are very rare.
- m) It is important to differentiate between the person who carried out the abuse and the act of abuse itself. The person quite possible may love or strongly like the alleged abuser while also disliking what was done to them. It is important therefore to avoid expressing any judgment on, or anger towards, the alleged perpetrator while talking with the person.
- n) It may be necessary to reassure the person that your feelings towards him or her has not been affected in a negative way as a result of what they have disclosed.

2. Giving Children the Confidence to Speak out

- 2.1.** For many complex reasons, children who are abused often hide their experience, and do not tell even adults that they know and trust. One of the reasons for this may be that the child has experienced abuse in which an adult has exercised control and power over them. The adult may also have used threats to harm them or their family if they do tell, or manipulated the child to believe that they are at fault in some way, or the cause of the abuse, or that they are complicit and should be ashamed.
- 2.2.** Different children respond to different experiences in different ways, but many children do not speak out about being abused.
- 2.3.** There are some things that we can do to promote an openness and receptive environment for children to share any concerns or reports:
 - a) Openly discuss the Holy Faith Sisters Safeguarding Children Policy and the Code of Behaviour and make sure that they know who to turn to if they have a worry or concern.
 - b) Ask children what makes them feel safe and not safe. Really listen and take account of what they say – make sure it is not tokenistic – and make sure that they know you are listening.
 - c) Display posters or have information leaflets especially for new children who join about child safeguarding and children’s helplines.
 - d) Publicise details of the name of the DLP and give details of how they can be contacted if the child has any concerns.
 - e) Make sure that the posters and leaflets make clear that certain behaviour is totally unacceptable, such as bullying, racist language, or threatening behaviour etc. they should also state what will happen if the behaviour does not stop.
 - f) Conduct short questionnaire or run groups to check on how things are going.
 - g) Have a copy of the Code of Behaviour (Appendix 23) and Complaints Procedure (Appendix 11) on prominent display in the organisation and as brochures available to all employees, volunteers, children and young people, families, visitors and partners.
 - h) Have a suggestion box. This provides a confidential or less intimidating way for children and young people to make suggestions or complaints about the organisation and the activities or events in which they participate.
 - i) Consider how disabled children can communicate their complaints especially if they have verbal communication difficulties. Remember how vulnerable disabled children are to abuse. It is especially important that their communication needs are not forgotten.

3. How to deal with a Complaint Received by Telephone

- 3.1.** The complainant should be encouraged to give their name and address.
- 3.2.** The complainant should be encouraged to speak to somebody at a place and time to be agreed. This person should have special training to deal with the issues and arrangements should be made to contact the complainant to set up such a meeting.
- 3.3.** The complainant should be encouraged to give sufficient information without going into detail and should cover, if possible, the following :-
 - a) The name of the person against whom the complaint is made.
 - b) When the alleged incident(s) took place.
 - c) Where the alleged incident(s) took place.
 - d) Name, address and telephone number of the complainant.

- 3.4. It is not advisable to have an in depth interview at this stage on the phone, if it is possible to avoid it. This may occur if the complainant is refusing to give his/her name and address or is refusing to give other relevant information or is refusing to agree to meet with somebody who would interview him/her in depth at a later date.
 - 3.5. The complainant should be given every reassurance that the matter would be dealt with seriously and sensitively.
 - 3.6. The complainant should be offered Counselling. See page 2 for counselling services contact details.
 - 3.7. No guarantee of confidentiality can be given to the complainant but he/she can be assured that every effort will be made to safeguard confidentiality so that only those who need to know will receive the information about the complaint. It is very important to record what is said in the telephone message and to check with the complainant the accuracy of what has been recorded.
 - 3.8. Arrangements should be made to communicate again with the complainant in whatever way suits the complainant and any commitments made in that regard should be met.
 - 3.9. Without any delay whatsoever the reporting procedure set out in Section 2 of this Policy should be set in motion.
 - 3.10. Where a complaint is received in any other way other than by telephone it should be immediately reported to the DLP and the reporting procedures should be followed.
4. **How to deal with concerns/reports received Anonymously, or from Third Parties (not the victim)**
- The Congregation recognises that not all allegations, disclosures, reports, suspicions or concerns will be disclosed in person or by the victim directly affected by the abuse. Some reports may be made through third parties, or reported anonymously.
- 4.1. **Anonymous Complaint/Report:** In the event that an anonymous complaint/report is received, the Congregation will follow the **Reporting Procedures** outlined in this Policy. The matter will be fully reported to the DLP who will in turn make all necessary reports in full to the civil authorities without delay.
 - 4.2. **Third Party Report:** In the event that the allegation, report, suspicion or concern is made through a third party, the Holy Faith Sisters and all employees and volunteers will follow the reporting procedures set out in Section 2. The matter shall be fully reported to the DLP, who will in turn report such details as have been received from the third party to the civil authorities without delay.
5. **How to respond to retrospective disclosures by adults of child abuse when they were children**
- 5.1. The Holy Faith Sisters accept and recognise that an increasing number of adults are disclosing abuse that took place during their childhoods, and that disclosures may be received from individuals who are adults. Their disclosures should be reported to the DLP in compliance with the reporting procedures outlined in Section 2.
 - 5.2. The Holy Faith Sisters recognise that it is essential to establish whether there is any current risk to any child who may be in contact with the alleged abuser.
 - 5.3. All members of the Congregation, employees and volunteers are required to follow the reporting procedures of section 2 carefully, and ensure that any such disclosures are immediately and fully reported to the DLP.
 - 5.4. The adult who made the disclosure should be offered counselling to assist in supporting them. The contact numbers for helpful counselling organisations are set out on Page 2 of this Policy.

6. Asking Questions

- 6.1.** Do not ask leading questions. For example, do not ask whether a specific person carried out the abuse.
- 6.2.** Questions should be supportive and for the purpose of clarification only.
- 6.3.** Avoid asking about intimate details or suggesting that something else may have happened other than what you have been told.
- 6.4.** Whenever possible and practical, without interrupting the flow of conversation, take notes during the conversation. Always ask permission to do this and explain the importance of recording all information. Where it is not appropriate to make notes at the time, make a written record as soon as possible afterwards and in any case before the end of the day.

7. Confidentiality – Do not promise to keep secrets

- 7.1.** Do not promise to keep the disclosure a secret.
- 7.2.** Explain that there are secrets which are not helpful and which should not be kept because they make matters worse. Such secrets hide things that need to be known if people are to be helped and protected from further ongoing hurt.
- 7.3.** Acknowledge that they have come to you because they trust you.
- 7.4.** Reassure the person that you will act in their best interests.
- 7.5.** Tell the person that you will be sharing this information only with people who understand this area and who can help.
- 7.6.** By refusing to make a commitment to secrecy to the person, the member of the Congregation, employee or volunteer runs the risks that the person may not tell them everything (or indeed anything). However, it is better to do this than to tell a lie, and ruin the person's confidence. Be honest with the person. By being honest, it is more likely that the person will return to the member of the Congregation, employee or volunteer at another time.

8. Recording

Immediately after receiving a disclosure, the member of the Congregation, employee, or volunteer must:

- 8.1.** Record in writing, in a factual manner, what the complainant has said.
- 8.2.** Insofar as is possible, the exact words used by the complainant should be recorded.
- 8.3.** Record the time, date, location (or if the matter has been communicated by letter or telephone), and persons present. The record should be signed and dated by the author.
- 8.4.** Do not be selective. Include detail, which to you may seem irrelevant. It may prove invaluable at a later stage in an investigation.
- 8.5.** Inform the DLP immediately.
- 8.6.** All original records, including rough notes, must be passed immediately to the DLP. Any copies of records retained must be kept secure and confidential – see Appendix 10.
- 8.7.** Not all persons raising a concern will wish to go through the recording and reporting process. Nonetheless, information about the existence of a potential allegation must always be communicated to your DLP.
- 8.8.** The DLP shall report the matter directly to Tusla (or to the Gardai where there is an immediate risk to the child and Tusla cannot be contacted, or where the matter is mandatorily reportable – see Appendix 6).
- 8.9.** Consideration should, in all cases, also be given to whether an immediate referral is necessary in order to preserve, and safeguard against the possibility of any loss, deterioration or destruction of potential evidence or forensic evidence.

- 8.10.** Agree measures to protect the child.
- 8.11.** Maintain appropriate confidentiality. It is important not to discuss the incident/concern with anyone other than those detailed in this Policy.
- 8.12.** Ensure that all records are stored securely, and only those who need to have access to them can do so (see Appendix 10). Where records are stored electronically, ensure that adequate levels of encryption are maintained to an appropriate standard.

9. Ongoing Support for the Complainant

Following a disclosure by a complainant, it is important that the person to whom they made the disclosure continues in a supportive relationship with the complainant, if possible. A complainant should be offered the services of a Support Person, whose role and responsibilities are outlined in Section 2 of this Policy. The Support Person should, if appropriate, continue to offer support, particularly through:

- Maintaining a positive relationship with the complainant,
- Keeping lines of communication open,
- Listening carefully to the complainant,
- Offering Counselling Services (see contact details on page 3)

Note: the Support Person is not a counsellor for the complainant and should not provide therapy or counselling services to the complainant. Any further disclosures should be treated in the same manner as the first disclosure.

10. Meeting with the Victim

Where the DLP meets with the complainant on a pastoral basis, the following principles should be observed:

- 10.1.** Do not meet with complainant alone.
- 10.2.** Suggest that the complainant brings a friend or relative with them to the meeting for support.
- 10.3.** Offer to appoint a Support Person to the complainant, to help and support them during this difficult stage.
- 10.4.** Assure the complainant that you are there to listen to them, and will take their complaint seriously.
- 10.5.** Invite the complainant to tell their story, only ask questions for clarification:
 - a) Who did what, where and when?
 - b) Did anyone else know?
 - c) Who knew?
 - d) Did you tell anyone?
 - e) What happened when you told?
- 10.6.** Offer counselling services – see page 3.
- 10.7.** Take notes, read them back to the complainant at the end of the meeting and ask them to confirm that the notes are an accurate reflection of the conversation. Inform the complainant if you are passing a copy of the notes to the civil authorities in line with this Policy. Have the notes signed by all present at the meeting.
- 10.8.** Record facts only with no interpretation of the facts.
- 10.9.** As soon as possible after the meeting, type-up the notes and send a copy to the complainant.
- 10.10.** All necessary information is to be given to the civil authorities as soon as possible after the meeting.

APPENDIX 13

Recruitment Checklist for Safe Recruitment, Vetting and Selection Policy

| <p>The policy needs mention: Once your policy is in place, even prior to any recruitment, it is good practice to mention that you have a Safeguarding Children Policy in place:</p> <ul style="list-style-type: none"> ✓ On your web site ✓ On promotional literature for activities or events ✓ In any advertisements for staff ✓ On application forms and recruitment literature | <p>Refer to Policy</p> | <p>Tick when Action is taken</p> |
|---|---|---|
| <p>Recruiting – Check contact with children What contact with children will be involved in job? Will the person have unsupervised contact with children or hold a position of trust? What other forms of contact will the person have with children e.g. email, phone, internet.</p> | <p>BEFORE you recruit – is there contact/potential involvement with children, young people and/or vulnerable persons?</p> | |
| <p>Defining the Role Tasks & skills for the job are identified. The job description refers to working with & having responsibility for children where applicable.</p> | <p>Follow Job Description template (appendix 14)</p> | |
| <p>Key selection criteria A list of essential & desirable qualifications, skills & experience.</p> | <p>Use this to screen applicants and for interview questions.</p> | |
| <p>Written application All applicants been asked to supply details requested in our application form including personal details, past & current work/volunteering experience.</p> | <p>Job Application form:- general employee (Appendix 15) or volunteer (appendix 16)</p> | |
| <p>Interview Two representatives meet with the applicant to explore information contained in the application. In advance, application forms should be considered, highlighting points to raise at the interview including:</p> <ul style="list-style-type: none"> - The applicants attitudes towards working with children - Areas that need more detail - Vague statements or unsubstantiated qualifications - Frequent changes of employment | <p>Interview chart – see questions – Section 3 of the Policy)</p> | |
| <p>At Interview – review Declaration Form Ensure applicants have signed the declaration stating ‘there is no reason why they would be considered unsuitable to work with children’. Likewise ensure applicants have signed the declaration in respect of criminal convictions & pending cases against them.</p> | <p>Has the Declaration Form been signed? See Appendix 19. Complete ‘For Official Use Only’ section of the application form.</p> | |

| | | |
|--|--|--|
| <p>Identification <i>Applicants are asked for photographic documentation to confirm their identity e.g. passport, drivers licence.</i></p> | <p>Ask that they bring to interview - see originals (appendix 17 for list of acceptable ID)</p> | |
| <p>Qualifications <i>Applicants are asked for documentation to confirm their qualifications.</i></p> | <p>Bring original documentation to interview</p> | |
| <p>References <i>Applicants are asked to supply the names of 2 referees who are not family members & ideally who have first-hand knowledge of the applicant's experience of work/contact with children. Referees are asked specifically to comment on the applicant's suitability to work with children. References should be carried out by phone call, followed up in writing. Identity of referees should be identified.</i></p> | <p>You make phone check, followed up in writing.</p> | |
| <p>Vetting procedures <i>Has the vetting procedure for your selected applicant been carried out? (In the R of I An Garda Siochana central vetting unit if applicable. In N.I Access vetting.)</i></p> | <p>Apply for vetting</p> | |
| <p>Records <i>Details are kept of the selection & induction process on the personnel file of the person appointed. References are kept on file as part of the record of the recruitment process.</i></p> | <p>Keep all documentation</p> | |
| <p>Confidentiality <i>Information about the applicant should only be seen by those directly involved in the recruitment process. Applicants should be reassured that information about them, including information about convictions, will be treated in confidence & not used against them.</i></p> | <p>Ensure all written documents are secure and comply with data protection provisions.</p> | |
| <p>Training <i>Incoming staff are made familiar with all the relevant provisions of this policy and related policies (Dignity at Work, Discipline, Grievance, I.T. etc.)</i></p> | | |

APPENDIX 14

Template Job Description

(Insert Title) - Sample Job Description

| | | |
|-------------|-----------------|--|
| Insert logo | Role Title | |
| | Reporting lines | |
| | Place of Work | |
| | Conditions | |
| | Date Prepared | |

Defining the Job Objective: (Why is the job required?)

Guidelines:

- Clarifies the context for goal setting
- Needs to be restated – not taken for granted that there is shared understanding of the job objectives are
- Consider *what would remain undone* if the job did not exist

KEY Result Areas: (What?)

Guidelines:

- *These aspects are critical to attaining the job objective*
- *Establishing key result areas helps effectiveness*
- *A step towards enhanced clarity*
- *Does this job involve working with or having responsibility for children? Please note question below, and refer to Safeguarding Children policy, if the role involves contact with children/young persons or vulnerable adults.*

Goals set - few in number, according to the SMART criteria:

A system such as **‘SMART’** goals, summarised below, is useful:

Specific: *they explicitly state what must be achieved (clearly stated)*

Measurable: *in quantifiable terms: goals set can be evaluated in terms of **quantity/quality** of the end result and resources used*

Achievable: *with a reasonable effort: they are realistic but challenging*

Results oriented: *not activity-oriented: the expected outcome is clear*

Time bound: *they have specific completion times*

| |
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| |
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Does this role involve working with and having responsibility for children either in person, by phone, internet or email? YES / NO

(please specify exact duties and refer to the provisions of the safeguarding children policy)

For use in Selection and Recruitment – Essential qualifications:

| |
|--|
| |
|--|

For use in Selection and Recruitment: Competencies, skills and experience needed

| |
|--|
| |
|--|

The XX Job Description indicates selected responsibilities which is indicative only and is not intended to be exhaustive.

XXXX is an equal opportunities employer

APPENDIX 15

Sample Application Form - Employee for those who will come into contact with Children and/or vulnerable adults

(All information received in this form will be treated confidentially)

Surname: _____ Forename: _____

Any other name previously known as: _____

Address: _____

Previous Address(es) over the last 5 years: _____

How long have you lived at your current address? _____

Tel: _____ Mobile: _____ DOB: _____

PPS Number (R.O.I): _____ N. I Number (N.I): _____

Are you (Please tick):

Employed Unemployed Student
Homemaker Retired Other

Education and Relevant Qualifications: (Attach C.V. or use additional pages)

Previous Work Experience: (Attach C.V. or use additional pages)

Do you agree to abide by _____ Our Code of Conduct and our Holy Faith Sisters Policy on Safeguarding Children (copy included with this form)?

Yes No

Have you completed Child Protection Awareness Training?

Yes No

If yes, who was it organised by and when approximately: _____

Do you agree to undergo specific training for the role of the *(position being appointed)*?

Yes No

Have you ever been asked to leave an organisation in the past? *(if your answer is 'yes' we will contact you in confidence)*

Yes No

Any other relevant information:

Please supply the names of two responsible people whom we can contact and who from personal knowledge are willing to endorse your application.

Name: _____ Name: _____

Address: _____ Address: _____

Tel: _____ Tel: _____

Designation: _____ Designation: _____

Please enclose a recent photograph with your application: (✓ to confirm)

Please enclose 2 forms of identification to verify your identity: (✓ to confirm)

I hereby confirm and declare that the above-mentioned information provided by me is true, accurate, complete and up to date in all respects:

Signed: _____

Date: _____

APPENDIX 16

Sample Application Form - Volunteer for those who will come into contact with Children and/or vulnerable adults

All information received in this form will be treated confidentially

Surname: _____ Forename: _____

Any other name previously known as: _____

Address: _____

Previous Address(es) over the last 5 years: _____

How long have you lived at your current address? _____

Tel: _____ Mobile: _____ DOB: _____

PPS Number (R.O.I): _____ N. I Number (N.I): _____

Are you (Please tick):

Employed Unemployed Student
Homemaker Retired Other

Relevant Qualifications: (Attach C.V. or use additional pages)

Previous Work Experience: (Attach C.V. or use additional pages)

How much time can you commit? (Please tick)

| | Mon | Tue | Wed | Thurs | Fri | Sat | Sun |
|-----------|-----|-----|-----|-------|-----|-----|-----|
| Morning | | | | | | | |
| Afternoon | | | | | | | |
| Evening | | | | | | | |

List any hobbies, interests or other activities you are involved in:

Do you agree to abide by _____ Our Code of Conduct and our Holy Faith Sisters Policy on Safeguarding Children (copy included with this form)?

Yes No

Have you completed Child Protection Awareness Training?

Yes No

If yes, who was it organised by and when approximately: _____

Do you agree to undergo specific training for the role of the *(position being appointed)*?

Yes No

Have you ever been asked to leave an organisation in the past? *(if your answer is 'yes' we will contact you in confidence)*

Yes No

Any other relevant information:

Please supply the names of two responsible people whom we can contact and who from personal knowledge are willing to endorse your application.

Name: _____ Name: _____

Address: _____ Address: _____

Tel: _____ Tel: _____

Designation: _____ Designation: _____

Please enclose a recent photograph with your application: (✓ to confirm)

Please enclose 2 forms of identification to verify your identity: (✓ to confirm)

I hereby confirm and declare that the above-mentioned information provided by me is true, accurate, complete and up to date in all respects:

Signed: _____

Date: _____

APPENDIX 17

Proof of Identity

Please note: We are required to request you to bring proof of your identity to Interview. The person who asked you to complete this Form (e.g. your prospective employer) must verify your identification. Acceptable identity documents are listed below. ***Please bring original documents to interview, they will be copied and returned to you immediately.***

Valid Identification Documents:

Three documents must be produced in the name of the Applicant; ***one from Group 1 and two from Group 2.*** It is preferred that **at least** one of these documents includes photographic identification

| For the Republic of Ireland | |
|---|--|
| <p>Group 1</p> <ul style="list-style-type: none"> • Valid passport • (any nationality) • Valid Driving Licence Full or Provisional. • Original birth certificate • (issued within 12 months of date of birth, full or short form acceptable) • Valid photo identity card • (EU countries only) • Adoption Certificate • Temporary residency card | <p>Group 2</p> <ul style="list-style-type: none"> • Marriage certificate/Civil Partnership Certificate • Non-original birth certificate (issued after 12 months of date of birth, full or short form acceptable) • P45/P60 statement • Utility bill (electricity, gas, water, telephone - including mobile phone contract/bill) • Valid TV licence • Credit card statement • Store card statement • Mortgage statement • Valid insurance certificate • Certificate of nationality • Work permit/visa** • Asylum Registration Card • Personal correspondence or a document from a Government Department* • Bank or Building Society Document** • Financial statement e.g. pension, endowment* • Valid vehicle registration document • Mail order catalogue statement* • Court summons • Valid Social Welfare/NHS Card • Court Claim Form • Addressed payslip* • PPSN /National insurance number card • Examination certificate (e.g. Leaving Certificate or GCSE, NVQ) • Letter from a School Principal* • Child benefit book <p>* documentation must be less than 3 months old ** documentation must be issued within the last 12 months</p> |

| For Northern Ireland | |
|--|--|
| <p>Group 1</p> <ul style="list-style-type: none"> • Valid passport (any nationality) • UK Driving Licence Full or Provisional – England/Wales/Scotland/Northern Ireland/Isle of Man; either photocard or paper (a photocard is only valid if accompanied with the paper counterpart) • Original UK birth certificate (issued within 12 months of date of birth, full or short form acceptable) • Valid photo identity card (EU countries only) • UK Firearms licence • HM Forces ID card (UK) • Adoption Certificate (UK) | <p>Group 2</p> <ul style="list-style-type: none"> • Marriage certificate/Civil Partnership Certificate • Non-original UK birth certificate (issued after 12 months of date of birth, full or short form acceptable) • P45/P60 statement • Utility bill (electricity, gas, water, telephone – including mobile phone contract/bill) • Valid TV licence • Credit card statement • Store card statement • Mortgage statement • Valid insurance certificate • Certificate of British nationality • British work permit/visa** • Asylum Registration Card • Access NI Disclosure Certificate • Personal correspondence or a document from a Government Department* • Bank or Building Society Document** • Financial statement e.g. pension, endowment, ISA** • Valid vehicle registration document • Mail order catalogue statement* • Court summons • Valid NHS card • Court Claim Form • Addressed payslip* • National insurance number card • Examination certificate (e.g. GCSE, NVQ) • Letter from a Head Teacher* • Child benefit book • Smartpass <p>* documentation must be less than 3 months old ** documentation must be issued within the last 12 months</p> |

APPENDIX 18

Reference Check

The following person: _____

has expressed an interest in working in: _____

If you are happy to complete this reference, any information will be treated with due confidentiality and in accordance with relevant legislation and guidance. Information will be shared only with the person conducting the assessment of the candidate's suitability for the post, if he/she is offered the position in question. We would appreciate your being extremely candid, open and honest in your evaluation of this person.

1. How long have you know this person? _____
2. In what capacity? _____
3. What attributes does this person have that would make them suited to this work?

4. Please rate this person on the following – please tick one box for each statement:

| | Poor | Average | Good | Very Good | Excellent |
|---------------------|------|---------|------|-----------|-----------|
| Responsibility | | | | | |
| Maturity | | | | | |
| Self-motivation | | | | | |
| Can motivate others | | | | | |
| Energy | | | | | |
| Trustworthiness | | | | | |
| Reliability | | | | | |

This post involves substantial access to children. As an organisation committed to the welfare and protection of children, we are anxious to know if you have any reason at all to be concerned about this applicant being in contact with children. YES

NO

If you have answered YES we will contact you to discuss this issue further.

Signed: _____ Date: _____

Print Name: _____

Position: _____ Organisation: _____

Please note that any replies furnished to [name of Holy Faith Sisters organisation] may be subsequently requested by and/or released to the above-named person pursuant to the Data Protection Acts 1988 and 2003 (as amended). Please note further that the [name of Holy Faith Sisters organisation] shall rely on the truth and accuracy of any references given.

APPENDIX 19

Disclosure of Criminal Convictions and Permission for Statutory Checks for those Working with Children (Please read this information carefully)

Statement of non-discrimination: The Holy Faith Sisters are committed to equal opportunity for all applicants including those with criminal convictions. Information about criminal convictions is requested to assist the selection process and will be taken into account only when the conviction is considered relevant to the post. Any disclosure will be seen in the context of the criteria for the responsibilities attaching to the post, the nature of the offence and the responsibility for the care of existing clients and employees.

For the purposes of your application for the position of: _____, it is our policy to ask for a check to be carried by the relevant authorities for this task.

Advice to Applicants:

Please complete this form as accurately as possible and return it marked “**Confidential**” in the envelope provided. An arrangement will be made with you to discuss any clarification is required.

Thank you for your co-operation.

You **must** tell us now if you have a case or prosecution pending or if you have ever been convicted of a criminal offence, or cautioned by the police, or bound over by the courts. You **must** include all offences, even minor offences. If you leave anything out it may affect your application. The disclosure of a criminal record or other information will not debar you from appointment as an employee or volunteer unless the Board of the Holy Faith Sisters considers that the conviction renders you unsuitable. In making this decision, the Board will consider the nature of the offence, how long ago it was committed, what age you were at the time and other factors which may be relevant.

Have you ever been convicted of a criminal offence or been the subject of a caution; a Bound Over Order (NI only); been given the benefit of the Probation Act (ROI); or are you at present the subject of criminal investigations?

Yes

No

If so, please state below the nature, date(s) and sentence of the offence(s)

Please provide any other information you feel may be of relevance such as:

- the circumstances of the offence
- a comment on the sentence received
- any relevant developments in your situation since then
- whether or not you feel the conviction has relevance to this post.

Have you ever been the subject of disciplinary procedures or been asked to leave employment or voluntary activities due to inappropriate behaviour towards a child or vulnerable adult?

Yes No

If yes, please give details including date(s) below:

I declare that all answers are complete, accurate and correct and I will inform the Leader/Director/Chairperson of the organisation immediately of any future convictions or charges. I hereby confirm my irrevocable consent to the Holy Faith Sisters making of such enquiries (including with the statutory authorities) as they deem necessary in respect of my suitability for the post(s) in respect of which the application is made. I hereby accept and confirm the entitlement of the Holy Faith Sisters to reject my application and/or terminate my employment (paid or unpaid) if I have omitted to furnish any relevant information, or if I have withheld information or included any false or misleading information. I understand and accept that any false or misleading information (including non-disclosure and omission) submitted by me in relation to my application for a position or my continuing employment (paid or unpaid) with the Holy Faith Sisters may render me liable to automatic disqualification from the application process, and/or render me liable to immediate dismissal without notice.

Signature: _____

Print Name: _____

Date: _____

Please return completed forms to: _____

FOR OFFICIAL USE ONLY:

Date application received: _____ Date of interview: _____

Interviewed by: 1. _____
2. _____

References received and are satisfactory: Yes No

Comments: _____

Statutory check completed & returned (if appropriate): Yes No N/A

Proof of applicant's identification received: Yes No

Identification type: _____

Recommendation: Approved Reasons Not approved Reasons

Signed: _____ Dated: _____

APPENDIX 20

Vetting Application form for Republic of Ireland



An Garda Síochána Use Only
Reference No.:

An Garda Síochána GARDA VETTING APPLICATION FORM

NOTE TO APPLICANT

- The Application Form must be completed in full using **BLOCK CAPITALS** (Please state N/A if details are not applicable)
- Writing must be clear and legible
- Return the completed form to Sisters Of The Holy Faith, 25 Clare Road, Drumcondra, Dublin 2
- Do not send this form to The Garda Central Vetting Unit or to any Garda Station

To be completed by the Applicant

| | |
|--|-------------------------|
| SURNAME: | PREVIOUS NAME (if any): |
| FORENAME: | ALIAS: |
| DATE OF BIRTH:(dd/mm/yy) | PLACE/CITY OF ORIGIN: |
| HAVE YOU EVER CHANGED YOUR NAME? Yes <input type="checkbox"/> No <input type="checkbox"/> | |
| IF YES PLEASE STATE FORMER NAME: | |

| Please state all addresses from year of birth to present date | | | | | | | |
|---|--------|------|--------|-----------|---------|-----------|---------|
| House No. | Street | Town | County | Post Code | Country | Year From | Year To |
| | | | | | | | |
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Please Continue Overleaf

Have you ever been convicted of an offence in the Republic of Ireland or elsewhere?

No Yes Please provide details

| DATE | COURT | OFFENCE | COURT OUTCOME |
|------|-------|---------|---------------|
| | | | |
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DECLARATION OF APPLICANT

I, the undersigned, who have applied for a position as a * _____ hereby authorise An Garda Síochána to furnish to **Sisters Of The Holy Faith** a statement that there are no convictions against me in the Republic of Ireland or elsewhere, or a statement of convictions and / or prosecutions, successful or not, pending or completed, in the State or elsewhere as the case may be, subject to the administrative filter implemented by the Minister for Justice and Equality on 31st March 2014.

Signature of Applicant: _____ Date: _____
 (_____)

* this field is mandatory

To be completed by Sisters Of The Holy Faith

Line Manager/Contact Person: _____ Location: _____
 PLEASE PRINT ALSO (_____)

Authorised Signatory: _____ (Sisters Of The Holy Faith)
 PLEASE PRINT ALSO (_____)

Authorised Signatory Registration Number: _____ Date: _____

To be completed by the Garda Central Vetting Unit

Checks were carried out by this office in accordance with current Garda Vetting policy and based on the information supplied in this application form. The results are as indicated below:

- No convictions
- Convictions
- Prosecutions are pending

NOTE : Checks were carried out at this office based on the information supplied. The convictions may apply to the subject of your enquiry. Please verify information disclosed with the applicant.

Signed: _____ Member I/C G.C.V.U.

APPENDIX 21

Vetting for Northern Ireland



Application form: Standard / Enhanced Disclosure ISA Registration



About this form

This form can be used to apply for an AccessNI Standard or Enhanced disclosure and/or to register with the Independent Safeguarding Authority [ISA]. If you are applying for an AccessNI disclosure and for ISA registration on this form, it must be for the same position – if not, two application forms must be completed.

Please complete this application form in CAPITAL letters and use black ink. Applicants must complete Parts B, C, D, E, F and G and return the form to whoever sent it to them for completion of Parts A, H, I and J.

If you require help completing this form you can visit our website on www.dojni.gov.uk/accessni where you will find step-by-step instructions in our Guidance. Alternatively you can call our helpline on 0300 200 7888 or speak to the person who asked you to complete the form.

Completed forms should be posted to: **AccessNI**
PO Box 1085
Belfast
BT5 9BD



Failure to complete the form correctly may result in a delay or the form being returned unprocessed.

PLEASE WRITE CLEARLY IN THE BOXES PROVIDED (Continuation sheets are available from www.dojni.gov.uk/accessni).

AccessNI Reference (AccessNI use only)

PART A Service required - to be completed by (prospective) employer

A1 Standard (£26) Enhanced (£30) Enhanced / ISA (£58) ISA only (£58) (Cross 1 box only)

A2 Registered Body Name

A3 Registered Body No.

A4 Counter Signatory No.

| | | | | |
|------------------------------|-----|-----|-----|-----|
| For AccessNI use only | | | | |
| | | | | |
| | MF1 | MF2 | Sc1 | Sc2 |
| | | | | |

PART B Applicant's details

B1 Title Mr Mrs Miss Ms Other
If 'Other' please give details

B2 Surname

B3 Forename(s)

B4 Name usually known by

B5 Surname at birth (if different)
 used until /

B6 Any other surname(s) used? No Yes *If 'Yes', please complete F1, if 'No' go to B7*

B7 Any other forename(s) used? No Yes *If 'Yes', please complete F5, if 'No' go to B8*

B8 Gender Male Female

B9 Date of birth /

B10 Place of birth - Town
 Country

B11 National insurance number

B12 Driving licence number

B13 Do you hold a valid passport? No *If No, go to B17.* Yes *If Yes, complete B14, B15 and B16.*

B14 Passport number

B15 Nationality

B16 Country of issue

B17 Do you have an ISA registration number? No *If No, go to B19.* Yes *If Yes, complete B18.*

B18 ISA registration number

B19 Do you have a Scottish Vetting & Barring number? No *If No, go to B21.* Yes *If Yes, complete B20.*

B20 Scottish Vetting & Barring number

B21 Preferred contact number

PART C Application for Registration with ISA

C1 Are you applying for registration with ISA? No *If No, go to Part D.* Yes *If Yes, complete C2 - C5.*

C2 Do you intend to work, paid or unpaid, with (Cross all that apply) Children Vulnerable Adults

C3 Do you intend to work, paid or unpaid, in controlled activity with (Cross all that apply) Children Vulnerable Adults

C4 Are you applying as a free of charge volunteer? No Yes
By placing X in the Yes box at C4 I understand that I may be liable for payment at a later date should my employment status change.

C5 Security information - name of first school

For security reasons you may be asked to provide this, together with other personal information, when contacting AccessNI or ISA.

PART D Applicant's current and delivery address

Please give details of your current address. This is the address to which all correspondence will normally be sent.

D1 Current address

D2 Town / City

D3 County

D4 Country

D5 Postcode

D6 Lived at this address since / /

Please give details of a preferred Delivery Address for the Applicant's Correspondence (if different from above).

D7 Delivery address

D8 Town / City

D9 County

D10 Country

D11 Postcode

PART E Address history

If you have lived at the address at D1-D5 for less than 5 years please provide details of all your previous address(es), including student accommodation, and dates of residence for the last 5 years. There must be no gaps in the dates; overlapping dates are acceptable. Please start with the most recent address and work backwards. If necessary, please use the approved Address Continuation Sheet – this is downloadable at www.dojni.gov.uk/accessni.

E1 Address

E2 Town / City

E3 County

E4 Country

E5 Postcode

E6 Lived at this address from / / to / /

E7 Address

E8 Town / City

E9 County

E10 Country

E11 Postcode

E12 Lived at this address from / / to / /

PART F Names history

This Section should only be completed if you have answered Yes to questions B6 or B7. You must provide details of your previous name(s), along with dates these names were used. There must be no gaps in the dates; overlapping dates are acceptable. Please use an additional page if necessary, clearly writing your current name at the top of the page.

F1 Previous surname

F2 date used from / / to / /

F3 Previous surname

F4 date used from / / to / /

F5 Previous forename

F6 date used from / / to / /

F7 Previous forename

F8 date used from / / to / /

Once you have completed Part F, please return to B8 to continue with this Form.

PART G Declaration by Applicant

By signing the applicant declaration box I confirm that the information that I have provided in support of this application is complete and true and I understand that knowingly to make a false statement for this purpose may be a criminal offence.

G1 Do you have any convictions? No Yes

G2 Signature of applicant (please sign in box)

G3 Date of signature

/ /

G4 Name (in CAPITALS)

Information you have supplied on this form, and any other additional information you have supplied in support of this application, may be passed to other Government organisations and law enforcement agencies.

You must now return this form to the person who asked you to complete it

For AccessNI use only

PART H Registered Body information

H1 Is the applicant applying for an AccessNI disclosure? No If No, go to H7. Yes If Yes, continue from H2.

H2 Position applied for

H3 Organisation Name

H4 Will the work be carried out at the home of the applicant? No Yes

H5 Is the disclosure required for the purposes of asking an exempted question? No Yes

H6 Is the disclosure required for a prescribed purpose? No Yes

H7 Are you entitled to know if the applicant is registered to work with children? No Yes

H8 Are you entitled to know whether the applicant is registered to work with vulnerable adults? No Yes

H9 Have you established the true identity of the applicant by examining a range of documents as set out in AccessNI Guidance, and verified the information provided in Parts B, C, D, E & F? No Yes

H10 Application type: New post holder Existing post holder Re-check of existing post holder

H11 Your reference Number (Do not use Counter Signatory number)

PART I Payment

I1 Method of Payment Account No Payment (Volunteer)

PART J Declaration by Countersignatory

I confirm that the requisite documentation and information has been supplied and checked in accordance with AccessNI Guidance. I declare that the information I have provided in support of the application is complete and true and understand that knowingly to make false statement for this purpose may be a criminal offence.

J1 Signature of registered person (please sign in box)

J2 Date of signature

/

J3 Name in CAPITALS

Data Protection

Information on this form will be treated in confidence. AccessNI is registered with the Information Commissioner. Data supplied by you on this form will be processed in accordance with the provisions of the Data Protection Act 1998. The full protection statement is set out in section 1,10 of our Guidance.

APPENDIX 22

Employee/Volunteer Acceptance Form

I confirm that I shall adhere to the Holy Faith Sisters Safeguarding Children and Vulnerable Adult Protection Policy, which is in place from time to time, and agree to fully participate in any training provided in this area. I acknowledge and confirm that I fully understand and accept that any failure to comply with the whole or any part of the Holy Faith Sisters Safeguarding Children and Vulnerable Adult Protection Policy may be considered to be a disciplinary matter and will be dealt with under the relevant Disciplinary Procedures in place in the workplace from time to time, and in addition may be reported to An Garda Síochána and could constitute a criminal offence.

Name: _____ Signed: _____

Date _____

I have never been investigated by any police force or statutory health service or child protection service, or investigated and/or disciplined or reprimanded by a previous employer in relation to complaints made concerning my treatment of children. I agree to the Board of Management / Local leader / Director of Work or organisation seeking a certificate from the Garda Síochána /PSNI to the effect that I have not been the subject of an investigation, prosecution or conviction relating to the neglect or the physical, emotional or sexual abuse of children.

Name: _____ Signed: _____

Date: _____

APPENDIX 23

CODE OF BEHAVIOUR

FOR MEMBERS OF THE CONGREGATION, EMPLOYEES AND VOLUNTEERS: EXPECTED STANDARDS OF ADULT-TO-CHILD BEHAVIOUR

This Code of Behaviour shall be read, understood and signed by every employee and volunteer before starting in their role. For existing members of the Holy Faith sisters employees and volunteers, it shall be brought to their attention, explained to them. Each individual shall be asked to sign the Code of Behaviour, confirming that they have read and understood it, have accepted it and will be bound by it.

1. General Conduct

- 1.1 Provide an example of good conduct you wish others to follow.
- 1.2 Operate within the Congregation's principles and guidance and any specific procedures.
- 1.3 Be visible to others when working with children whenever possible.
- 1.4 Develop a culture where children can talk about their contacts with employees and others openly.
- 1.5 Respect each child's boundaries and help them to develop their own sense of their rights as well as helping them to know what they can do if they feel that there is a problem.
- 1.6 Never sexually harm, or speak to a child using sexually explicit language.
- 1.7 Do not spend time alone with a child or young person. Should circumstances arise where this is unavoidable, immediately inform another responsible adult, by telephone if necessary. Make a diary note that the meeting with the young person took place, including the reasons for it.
- 1.8 Observe best practice in relation to travel with children and young people. Members of the Congregation, employees and volunteers should not undertake any car or minibus journey alone with a child or young person. If in certain circumstances only one adult is available, there should be a minimum of two children or young people present for the entire journey. In the event of an emergency where it is necessary to make a journey alone with a child, make a record of this and inform the child's parents or guardians as soon as possible. Inform a colleague at the time if the parents/guardians are not available
- 1.9 Unless there are at least two adults present avoid permitting children and young people to work or remain in Congregation property.
- 1.10 Treat all children and young people with equal respect; favouritism is not acceptable.
- 1.11 Never discriminate on the basis of race, culture, age, gender, civil status, disability, religion, sexuality, membership of the traveller Congregation, or political views.
- 1.12 Never show different treatment or favour particular children to the exclusion of others.
- 1.13 Be cognisant of the imbalance in power inherent in adult-child relationships.
- 1.14 Challenge and report potentially abusive behaviour.
- 1.15 Do not engage in or tolerate any behaviour – verbal, psychological or physical – that could be construed as bullying.
- 1.16 Do not spend a disproportionate amount of time with any particular child or group of children.
- 1.17 Under no circumstances, give alcohol, tobacco or drugs to children or young people.
- 1.18 Do not use alcohol, tobacco or drugs when supervising or working with children and young people.

- 1.19 Use only age-appropriate language, media products and activities when working with children and young people. Sexually explicit or pornographic material is never appropriate, and will be considered gross misconduct to be dealt with under the disciplinary procedure, the consequence of which could include immediate dismissal.

2. Meetings with Children and Young People

- 2.1 Never take children to your own home, especially when they might be alone with you.
- 2.2 If the pastoral care of a young person necessitates the arrangement of a meeting alone with them, do not meet in isolated environments. Meet them in a public place where others are present and/or nearby.
- 2.3 Schedule meetings at times and at designated locations that allow for transparency and accountability (for example, rooms with a clear glass panel or window, an open door, and in buildings where other people are present).
- 2.4 Scheduling meetings with a child or young people by text messages is inappropriate and should not be done
- 2.5 Limit both the length and number of meetings.
- 2.6 Inform parents or guardians that the meeting(s) are taking place, except in circumstances where to do so might place the child in danger. In that case, inform a colleague in advance of the meeting. Seek the consent of the parent and child in writing for the meeting.
- 2.7 Do not encourage visits to, or conduct meetings in, private homes or personal living quarters.
- 2.8 When the need for a visit to the home of a child or young person arises, professional boundaries must be observed at all times.

3 Discipline

- 3.1 Corporal punishment of children is never permitted under any circumstances.
- 3.2 Discipline problems should be handled in partnership with parents and guardians, and should never involve physical punishment or any other forms of degrading or humiliating treatment.
- 3.3 Members of the Congregation, employees and volunteers must never hit or otherwise physically assault or physically abuse children, develop sexual relationships with children, develop relationships with children which could in any way be deemed exploitative or abusive, or act in ways that may be abusive or may place a child at risk of abuse.

4 Respect for Physical Integrity

- 4.1 Respect the physical integrity and personal space of children and young people at all times.
- 4.2 Do not engage in inappropriate physical contact of any kind, including rough physical play, physical reprimand and horseplay (tickling, wrestling, etc).
- 4.3 This should not prevent appropriate contact, with the permission of the child, or young person, in situations where it is necessary to ensure the safety and wellbeing of a child, but where the child expresses discomfort or resistance then this contact should cease.

5 Respect for Privacy

- 5.1 Respect the privacy of children and young people at all times
- 5.2 Particular care regarding privacy must be taken when young people are in locations such as changing areas, swimming pools, showers and toilets
- 5.3 Never take photographs of children or young people while they are in changing areas (for example, in a locker room or bathing facility).
- 5.4 Never do things of a personal nature (for example, helping with toileting, washing or changing clothing) for children and young people that they can do themselves.

6 Poor Practice

Members of the Congregation, employees and volunteers must avoid actions or behaviour which could be construed as poor practice or potentially abusive, for example, they should never:

- 6.1 Use language, make suggestions or offer advice which is inappropriate, offensive or abusive.
- 6.2 Behave physically in a manner which is inappropriate or sexually provocative.
- 6.3 Have a child/children with whom they are working to stay overnight at their home unsupervised.
- 6.4 Sleep in the same room or bed as a child with whom they are working.
- 6.5 Do things for children of a personal nature that they can do for themselves.
- 6.6 Condone or participate in, behaviour of children which is illegal, unsafe or abusive.
- 6.7 Act in ways intended to shame, humiliate, belittle or degrade.
- 6.8 Discriminate against, show different treatment or favour particular children to the exclusion of others.

APPENDIX 24

Personal/Intimate Care of Children with Disabilities

When running or administering any activities for children or young people, the following principles shall be respected and applied strictly by all members of the Congregation, employees and volunteers. Intimate care is any care which involves washing, touching or carrying out an invasive procedure such as cleaning up a child after they have soiled themselves or assisting a disabled child to use toilet facilities. The issue of intimate care is a sensitive one and will require members of the Congregation/employees/volunteers to be respectful of the child's needs. The child's dignity should always be preserved with a high level of privacy, choice and control. The child will be supported to achieve the highest level of autonomy that is possible given their age and abilities. The Holy Faith Sisters recognise that in some circumstances, some of the children with whom they come into contact with may have special needs which necessitate them requiring assistance with tasks of a personal nature. Individuals with such special needs can be very vulnerable, and all individuals involved with their care must be particularly sensitive to their needs. In the event that an individual has special needs, their parent/guardian must advise the Holy Faith Sisters of those special needs and of any special arrangements which will need to be put in place. The Holy Faith Sisters will then consult with the parents/guardians in order to put in place a tailored procedure to be followed in particular circumstances. In particular this tailored procedure should stipulate any communication tools and/or additional resources which should be employed for a child with communication difficulties. When developing any tailored procedure consultation with the parents/guardians, the Holy Faith Sisters will ensure that the best interests of the child are protected at all times. Key consideration will be given to preserving the child's dignity and privacy. The following principles of best practice shall be observed in all cases (the points outlined below are not exhaustive):

1. No adult should do anything for the child that the child is capable of doing for him or herself.
2. The child's attempts to help with tasks should be encouraged and they should be allowed to do any task that they are capable of doing.
3. No young person under 18 years will be asked to carry out a task more suited to an adult.
4. Personal or intimate care must always be undertaken with the consent and permission of the child and parent.
5. Prior permission for intimate care tasks should be gained after discussion with parent and/or child and agreement reached on how the specific tasks will be conducted.
6. While physical contact/touching may be used to comfort, reassure or assist a child, the following should be factors in determining its appropriateness: Is it acceptable to the child? Is it open and non-secretive?
7. Only employees/volunteers who have been vetted are to be assigned to intimate care tasks.
8. The carer should be the same sex as the child to ensure the dignity of child is respected. Particularly for toileting, a person(s) of the same sex as the child will attend to the child.
9. The child's reaction to a situation needs to be accepted as the guide to the child's wishes.
10. Where there are speech, language, hearing or cognitive difficulties, an agreed method of communication is arrived at beforehand and time taken to familiarise the child with the method.
11. It is best practice to call parents in the case of a child soiling/wetting him/herself.
12. If employees/volunteers must clean/change the child, two persons, familiar to the child will attend to him/her. Parents/guardians will be notified of such incidents. A record of the incident should be kept.
13. In the case of tours/outings children with special needs who need assistance with intimate care tasks should always be accompanied by a family member/carers.
14. Concerns about anything during intimate care should be reported using the reporting procedure outlined in Section 2 of this Policy.

Appendix 25

Good Management Practices for Operating Safe Activities for Children

The operation of thorough recruitment and training procedures as outlined in the previous sections will help to keep children safe, but other strategies should be put in place to minimise the possibility of them coming to harm.

Safe management practices involves:

- Adopting safe management practices as outlined below
- Supervising children in all activities
- Knowing how to deal with discipline and challenging behaviour
- Providing training for all workers on a regular and timely basis
- Putting in place appropriate supervision of, and support for, workers

1. Safe Management Practices:

Safe management practices will not only enable an organisation to run smoothly and efficiently, but it will also help to minimise the possibility of accidents occurring and of harm being done to children. The following pointers should be considered:

2. Know the children

- Have defined criteria for membership of the organisation
- Have a registration system for each child
- Keep a record in respect of each child, including parental consent form, medical details, any special needs and emergency contact telephone numbers

3. Parental Consent

- Signed consent must be obtained from parents or guardians of each child or young person prior to their participation in events, activities and groups.
- Establish from parents or guardians whether the child or young person has any specific dietary requirements, medical or special needs, or intimate care needs.
- For a template Parental Consent form, see Appendix 26 which is based on the template available for download at Resource 7 of the NBSCCCI Resources. This should be adopted and tailored as required when organising an activity for children or young people.

4. Keep records

Each Group organising an activity for children or young people will be responsible for storing in a confidential way an accurate record for each activity:

- Keep a record of attendance at events and activities
- Keep an incident book recording incidents and accidents. Incidents and accident records should be reviewed regularly and any unusual patterns reported to senior management
- Keep a record of all complaints or grievances
- Retain completed consent forms. This record should include a copy of the signed parental/guardian consent form with contact details for parents/guardians and should include necessary medical information
- A written record of organisers and supervisors in attendance at events should also be kept.
- Ensure that an Incident Report Form is completed in the event of any accident or incident relating to a child or young person.

5. Know the workers

- Follow thorough recruitment and selection procedures as outlined in Section 3 of this Policy.
- Have a work schedule displayed so that everyone knows who is on duty.
- Respond immediately to any allegations or complaints made about workers. Follow the reporting procedure outlined at Section 2 of this Policy.

6. Health and Safety

Pay attention to health and safety matters, in particular making sure that:

- Adequate and appropriate supervision must be provided in relation to all events and activities organised for children and young people (see below for recommended ratios).
- In places such as changing areas, toilets and showers, separate provision must be made for boys and girls.
- There must be adequate and gender-appropriate supervision of boys and girls in such areas.
- Ensure that buildings and/or facilities used for events and activities are suitable, safe and secure.
- Make sure that fire precautions are in place and that fire extinguishers are checked regularly.
- Make sure a first aid kit is readily available. This should be regularly checked and replenished. It is advisable that first aid training be provided for workers and volunteers.
- Be alert to the risk of injury involved in some contact sports, paying particular attention to the child's age and to any medical condition or disability.
- Access to a telephone at all times is essential in case of emergency.
- Adequate insurance must be obtained to cover all activities. In cases of uncertainty about the level of cover, check with the relevant insurance provider.
- Where transport is being provided by the Community make sure that drivers and vehicles meet legal requirements.
- Where transport is being hired, check with the service provider that drivers and vehicles conform to legal requirements. Always inform parents/guardians about transport being used.
- A clear policy should be agreed with parents and guardians regarding the taking of photographs and the making of video recordings of children or young people involved in parish-related activities or events.
- There should be regular health and safety reviews of facilities, procedures and practices.

7. Trips Away From Home/Overnight trips

If the activities involve staying away from home overnight, (eg. pilgrimages, day trips, overnight stays and holidays) the following steps shall be followed:

- All trips need careful advance planning including adequate provision for safety in regard to transport, facilities, activities, and emergencies. Adequate insurance should be in place. Leaders must be properly qualified and supervised for activities undertaken
- Written parental consent specifically for each trip and related activities must be obtained well in advance.
- Contact details for the duration of the trip are necessary.
- Written permission for leaders to make decisions of an emergency nature should be obtained in case of accidents.
- A copy of the itinerary and contact telephone numbers should be made available to parents or guardians.
- There must be adequate, gender-appropriate, supervision for boys and girls.
- Training must be provided for all leaders.
- All leaders (including volunteers) shall be fully vetted and shall supply the relevant Statutory Declaration confirming that they are suitable to work with children and young people. (See guidelines set out at Section 3 of this Policy).
- Arrangements and procedures must be put in place to ensure that rules and appropriate boundaries are maintained in the relaxed environment of trips away. These rules and boundaries must be clearly outlined to all leaders during preparation/training for the event.

- Particular attention should be given to ensuring that the privacy of young people is respected when they are away on trips.
- Sleeping areas for boys and girls should be separate and supervised by two adults of the same sex as the group being supervised.
- Under no circumstances should any adult share a bedroom with a child or young person.
- If, in an emergency situation, an adult considers it necessary to be alone in a children's dormitory or bedroom without another adult they should (a) immediately inform another adult in a position of responsibility and (b) make a diary note of the circumstances.

8. Supervising children in all activities

Children are less likely to experience accidents or harm if they are supervised properly. Activities should be organised so that they maximise participation, fun and learning, but are also safe. It is important to ensure that:

- Children are not left unsupervised
- Adequate numbers of workers of both sexes are available to supervise the activities
- Recommended ratio of adults per number of children:

| 0 – 2 yrs | 2 – 3 yrs | 3 – 7 yrs | 8 yrs & over |
|-----------------------|-----------------------|--|--|
| 1 staff to 3 children | 1 staff to 4 children | 1 staff to 8 children (6 children for outdoor activities) | 2 staff to 20 children (15 children for outdoor activities) |

- There should be 1 additional staff member for every 10 children.
- At all times, workers should know where children are and what they are doing.
- Any activity using potentially dangerous equipment has constant adult supervision. Dangerous behaviour is not allowed.

9. Dealing with Incidents and Accidents

It is vitally important to take health and safety concerns into account when considering the issue of child protection. Listed below are several precautions that must be taken in this area as well as the steps which should be taken in the event of an accident:

- The Holy Faith Sisters must maintain up-to-date records of the contact details of all children with whom they come into contact and their parents/guardians.
- Numbers for emergency services should be prominently displayed.
- First aid kits should be easily accessible and regularly re-stocked.
- Staff members and volunteers should be familiar with the location of first aid kits and receive basic training in first aid.
- Children and young people should be made aware of any potential health and safety risks to themselves and others.
- Extra precautions must be taken for activities or events which take place off-site.
- If a child or young person gets injured, the adult present must immediately contact the emergency services if necessary.
- The Regional Leader/manager in charge of the programme and the child or young person's parent/guardian must also be notified.
- It is important not to touch or move the child or young person more than absolutely necessary and to try to keep other children or young people away from the scene as much as possible.
- Once the emergency services arrive, the member of the Congregation/employee/volunteer must ensure that everyone present complies with their instructions.

- All details of the accident must be recorded afterwards into the Incident File, which is kept in the office of the Regional Leader/manager in charge of the programme. The Incident File details all accidents, incidents and near-misses. It is the obligation of each employee/volunteer to complete a report log in the Incident File if they witness any accident.
- Those involved in the accident must be kept informed of any action that may be taken as a follow up to the incident.
- The Holy Faith Sisters have in place an appropriate insurance policy relating to public liability and occupiers' liability. In the event of any accident occurring, a notification must be made to the insurance company as soon as possible (even if no claim is being made).

APPENDIX 26

Sample Parental Consent Form

Activity permission form for persons under 18 years
Information provided on this form will be treated as confidential

1. Name of Holy Faith Sisters Work: _____
Venue: _____ Activity/Event: _____
Group: _____
Date: _____ Time: _____
Name of Group Leader/person responsible: _____

2. Name of Child/Young Person: _____
Address: _____
Telephone No. _____ Date of Birth _____

3. Give details of **any** medical condition of which the organisation ought to be aware.
Please include details of any dietary requirements and of any medication which has to be taken.

I have read all the information provided concerning the programme of the above activity. I hereby give permission for my son/daughter/ward to participate in the above activity.

4. Holy Faith Sisters Community/ Organisation only accepts liability or responsibility for an incident or accident caused by the negligence or breach of statutory duty of the *organisation*, its servants or agents.

Signed: _____ Date: _____

(Parent/Guardian)

Address: _____

(if different from above)

Contact persons and their telephone numbers: