



diocese
of limerick
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Diocese of Limerick

Safeguarding Children

Standard 1

Creating and Maintaining Safe Environments

This document is updated on a regular basis

Extract from Diocesan Policy and Procedures Document

Standard 1

Creating and Maintaining Safe Environments

**This Section of the Procedures Document
Sets out how the Diocese of Limerick implements
Standard One
of the National Board for Safeguarding Children in the
Catholic Church in Ireland
'Safeguarding Children Policy and Standards for the Catholic
Church in Ireland 2016'**

**Its purpose is to identify what needs to be in place in each Parish and Youth
Ministry to keep children and young people safe**

*(National Safeguarding Children Policy and Standards for the Catholic Church in
Ireland 2016 is available to Parishes in the Diocese together with the National
Board's Guidance Documentation on their website at www.safeguarding.ie.)*

Roles of Safeguarding Personnel

The role of key personnel within the Diocesan Child Safeguarding Structure of the Catholic Church in Ireland across the Seven Safeguarding Standards is set out in Appendix 1.

In relation to Standard 1, responsibilities are:

Bishop

- Appointing a safeguarding committee, and, along with that committee, ensuring that Local Safeguarding Representatives (LSR's) are in place across the Diocese;
- Ensuring, with parish priests or local superiors, that all those who are recruited as Church personnel are suitable and appropriate for their role;
- Ensuring compliance with civil law and policy in creating and maintaining safe environments, and regarding areas such as vetting, safe recruitment, adult-to-child ratios, codes of conduct and risk assessment.

Safeguarding Committee

- Producing a three-year plan for how to implement and maintain Standards 1, 5, 6 and 7 across the Diocese. This includes the development of procedures and practice around creating and maintaining safe environments;
- Liaising with the local safeguarding representatives to identify areas where guidance and support on policy or practice is needed;
- Ensuring that records for activities related to child safeguarding are produced and stored appropriately as set out in Appendix 33 which is in keeping with Guidance of the National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI).

Local Safeguarding Representative (LSR)

Checking and providing advice and support so that all Church activities are being carried out in line with the safeguarding policies and procedures of the Diocese;

- Liaising with the child safeguarding committee around areas where further child safeguarding advice and support are required.

Safeguarding Service

The safeguarding service, under the Director of Safeguarding, is responsible for the day to day delivery of safeguarding services in support of Parishes and Diocesan agencies.

A linkage to the National Board website is provided on page 12 to facilitate access to its material and information. The Diocese of Limerick wishes to acknowledge the work of the National Board for Safeguarding Children.

Leaders of Youth Ministry

Role: To ensure that safe practices and codes of behaviour are maintained, and that all safeguarding concerns are addressed within Diocesan policy and procedures

Leaders of Youth Ministry must:

- Complete the application form (Appendix 6)
- Complete Garda vetting
- Complete the prescribed one-day safeguarding training programme every three years

Sacristan

Role: To ensure that the sacristy protocol is adhered to and that safe practise and codes of behaviour are maintained and all safeguarding concerns are addressed in compliance with Diocesan policy and procedures.

Sacristans must:

- Complete the application form (Appendix 6)
- Complete Garda vetting
- Complete the prescribed one-day safeguarding training programme every three years

Parish Safeguarding Checklist

The checklist identifies those elements that need to be in place in each parish to ensure the creation and maintenance of safe environments for children and young people.

Information to be Displayed and Available:

- Diocesan **Safeguarding Children Policy Statement** in all appropriate places.
- Poster and leaflet providing **information for young people**. Appendix 3
- Poster and leaflet providing **information for parents/guardians**.
- Diocesan **Sacristy Safeguarding Protocol Poster**.
- Copy of the **Safeguarding Children Policy and Standards for the Catholic Church in Ireland 2016**, in each Parish Office and Sacristy.

Requirements in respect of Volunteers that have access to, or have an involvement with, children, young people and/or vulnerable persons within and on behalf of the parish.

- | | |
|---|---|
| • Completed the appropriate Volunteer Application form (Appendix 8). | • Been advised as to the content of the diocesan safeguarding policy & procedures |
| • Submitted the required References (Appendix 8) | • Signed the agreement to comply with the diocesan safeguarding policy & procedures (Appendix 8) |
| • Completed Confidentiality Declaration forms. (Appendix 8) | |
| • Undergone Garda vetting | • Forms and paperwork relating to the above are securely stored locally. |
| • Received the appropriate safeguarding information and/or training . | |

Parish Safeguarding Representative:

- Has the Parish appointed **Parish Safeguarding Representative(s)** who have been appropriately trained and Garda vetted?

Registers for individuals/groups/organisations, involving children, associated with the parish or diocese, i.e.-

- | | |
|---|----------------------|
| • Altar Servers | • Children's Liturgy |
| • Youth Choir | • Mass Readers |
| • Adult Choir with children involved | • Youth Club |
| • Sacramental preparation
(includes 'Do This in Memory' and 'You should be My Witness' Programmes) | • Youth Retreat |
| | • Other groups |

Groups/organisations involved with children on behalf of the parish:

- Has each group been **approved** to work within the Parish by the Parish Priest?
- Has each group been provided with the **Information Pack** for Parish groups involving children?
- Is each group **complying** with the **requirement** in the Information Pack for Parish groups involving children?

Children involved in ministry:

- Has each parent/child signed a **Joint Consent** Form? (Appendix 24)
- Has each parent/child received a copy of the **Information Leaflet** for parents/children involved in Parish/Diocesan youth activities? (Shown in Appendix 3)

Training

- Have all Safeguarding Representatives and Leaders of Groups working with young people, attended the One Day Training Programme?
- Have all other staff who have ministry with children attended a Safeguarding Information Session?
- Is there any other form of role-specific training which would enhance safeguarding in your parish?

Non-church groups working with children and using Church property *(Page 16)*

- Has each group completed the appropriate Application Form? (Appendix 27)
- Has the Parish Priest given permission for the group?
- Has each group confirmed that it has:
 - Its own Insurance indemnifying the Church.
 - Its own Safeguarding Policy including Vetting

Sacristy:

- Is the Sacristy Poster on display in the Sacristy?
- Is the Sacristy sign in/out book always completed? (Appendix 23)
- Is the Sacristy Protocol followed?
- Are visiting clergy asked for Celebret/Letter of Permission to Minister?

The Storage of Records and Information:

- Are all safeguarding-related information/records stored securely?

Dealing with Complaints or Concerns:

- Have all safeguarding complaints/concerns been reported to the Designated Liaison Person/Director of Safeguarding?

This checklist is to be read in association with the Parish Audit Form (Appendix 2).

All procedure forms are available on the Diocesan website www.limerickdiocese.org

Sacristy Safeguarding Protocol

The safeguarding arrangements within Sacristies are as outlined in the Sacristy Safeguarding Protocol (Appendix 3). This Protocol must be displayed on all sacristies within the Diocese.

- ☐ It is the responsibility of the Parish Priest to ensure that in every Sacristy an identified person is responsible for ensuring compliance with the Protocol and the maintenance of the Sacristy Register.
- ☐ Children are welcome and encouraged to participate in the life of the Parish, and their welfare is promoted by observing the following protocol:
- ☐ Priests, sacristans, altar servers and other persons involved in any form of ministry must sign the Sacristy Register
- ☐ Visiting priests must show a valid celebret or letter of good standing from their Diocese/Ordinary, to be recorded in the Sacristy Register
- ☐ Other visiting religious or lay people involved in ministry will also show permission from the Diocesan Office to be involved in ministry within the Diocese
- ☐ Visiting priests and any other persons involved in any form of ministry will show confirmation that they have been vetted by the Diocese of Limerick (except in once-off unregulated situations, for example funerals or weddings, where involvement with children/vulnerable persons is incidental)
- ☐ Other persons should not be left alone with children/vulnerable persons in the Sacristy.

Everyone involved in ministry must comply with the Safeguarding Policy and Procedures of the Diocese of Limerick

Safe Recruitment Procedures

The Bishop acknowledges that safe care starts with the appointment of suitably qualified, skilled and vetted personnel who have the desired competencies and skills to carry out their function in an effective, efficient and safe manner. Whoever is employed by the Church, either in a pastoral or voluntary role, must be recruited in accordance with diocesan recruitment protocols, and deemed suitable for the role that they are being asked to undertake.

Safe recruitment means that the Bishop will ensure that:

- ☐ All reasonable steps are taken to ensure that the Church eliminates applicants who might pose a risk to children;
- ☐ Those engaged in the recruitment process are suitably trained and experienced to undertake this task;
- The Church's recruitment procedures are transparent, adhere to best practice and comply with the rules of natural justice, appropriate record-keeping and human resource management;
- ☐ The Church is committed to the policy of inclusion and equality.

Appointment procedures (clerics/religious)

For clerics/religious who are part of the Diocese in which they are ministering, the following procedure must be completed. All priests and religious should have gone through a formation programme that should include safeguarding children. In addition to this, the Diocese must ensure the following takes place prior to any appointment:

- That the cleric/religious is inducted in the Church's child safeguarding policy; that they sign a declaration form stating that there is no reason why they would be considered unsuitable to work with children (Appendix 7). Approval for Ministry in the Diocese of Limerick (Appendix 14) is conditional on the cleric/religious agreeing to follow Diocesan Safeguarding Policy and Procedure.
- ☐ Requiring the cleric/religious to undergo relevant vetting/clearance procedures set out in the Diocese of Limerick Vetting Procedure.
- ☐ Ensuring that the cleric/religious attends training, in particular child safeguarding training as detailed under Standard 5 Training and Support for Keeping Children Safe of the NBSCCCI.
- ☐ It should be noted that any Clerics/Religious who is coming to work or volunteer in the Diocese of Limerick, who worked or volunteered in another country for more than one year, must provide a certificate of police clearance from the country or countries in which they have lived for a year or more, prior to coming to Ireland. Advice and support in obtaining a police clearance certificate can be found at www.fingerscan.ca and also at www.coru.ie/en/registration/police_clearance.

If a cleric or religious is not part of the Diocese and applies for a voluntary or paid role within the Diocese, they must follow the recruitment procedures for paid or voluntary staff. If the cleric or religious is visiting the Diocese and is seeking to minister, the procedures set out on page 21 for visiting clergy and persons wishing to be involved in any form of temporary ministry in the Diocese of Limerick must be followed.

Recruitment procedures (paid staff)

The following procedures apply to the process of all appointments. It should be noted that these procedures do not affect the applicant's rights under the relevant employment legislation.

- Use a recruitment and selection checklist to ensure that effective practices are followed (Appendix 4).
- Use an application form, including reference requests (Appendix 6).
- Interview applicants to discuss their application form. This interview will include applicants being advised of their responsibilities towards children, and assessment of their suitability will include an awareness of child protection and safe care practices.
- Interview boards will be comprised of experienced and qualified personnel with a proven ability to draw out and explore the information that the candidate has included on their application form.
- All paperwork associated with the application process should be kept in accordance with record storage policy. All references, reports and communications in respect of the applicant should be in writing, and access to them will only be available to appropriate personnel within the Church. Candidates will be advised that their application and the follow-up process of recruitment will be dealt with in the strictest confidence.
- The successful applicant will be offered a position subject to:
 - a. Suitable references (Appendix 9).
 - b. Signing a confidential declaration form (Appendix 7).
 - c. Proof of qualifications, where applicable.
 - d. Relevant Diocesan vetting/clearance procedures.
 - e. Positive proof of identification.

Once appointed, the following elements are critical:

- Ensure probationary periods are served, where appropriate;
- Ensure that the member of Church personnel is inducted in the Church's child safeguarding policy and that they agree to follow the policy and procedures of the Diocese of Limerick.
- Ensure professional support, supervision and appraisals are offered to Church personnel, where appropriate.
- Provide ongoing training to Church personnel, in particular child safeguarding training detailed under Standard 5: Training and Support for Keeping Children Safe of the NBSCCCI.

Recruitment procedures (volunteers)

Reasonable steps should be taken to ensure that all volunteers who work with children in the Church are assessed as 'safe'. This includes conducting the following procedures for all volunteers:

- Complete and read carefully the Application Form (Appendix 8). This includes a statement that there is no reason why they would be considered unsuitable to work with children.
- Vetting through the Garda Vetting Bureau.

Requirements for Visiting Clergy and any Person wishing to be involved in any form of Temporary Ministry in the Diocese of Limerick

Visiting clergy refers to those seeking to minister on a short-term basis, for a special event, during holidays, or as part of mission/retreat or other short-term pastoral activity.

In this procedure, Section A sets the requirements for Visiting Clergy, from within or outside of Ireland, wishing to minister in the Diocese. Section B sets the requirements for visiting persons in any form of Consecrated Life - Non-ordained Religious, from within or outside of Ireland, wishing to minister in the Diocese. Section C sets the requirements for Lay-Persons from outside the Diocese wishing to be involved in Apostolic Work within the Diocese.

Key Points

In advance of the visit and prior to the commencement of any ministry, a cleric or other person wishing to be involved in any form of temporary ministry in the Diocese of Limerick must:

- Write seeking permission of the Bishop.
- Submit a completed *Declaration of Good Standing Form* (Appendix 12)
- Provide the name of his Bishop/Superior and contact details of the Church Authority to which he is incardinated.

The relevant forms referred to in Sections A, B and C are as follows:

- Application - Declaration Form of Good Standing (Temporary Ministry Clergy) (Appendix 12)
- Acknowledgement Letter - Request for Short-Term Ministry (Appendix 11)
- Confirmation of Good Standing – Diocese / Superior (Appendix 13)
- Approval Letter for Ministry - Diocese of Limerick (Appendix 14)
- Confirmation of Good Standing for Non-Ordained Religious (Appendix 15)
- Form to be completed by Person wishing to be involved as a visiting Lay Minister in the Diocese of Limerick (Appendix 18)
- Acknowledgement Letter - Requests by Lay Persons from outside the Diocese who wish to be involved in Ministry within the Diocese of Limerick (Appendix 19)
- Confirmation of Good Standing for Lay Persons (Appendix 20)

Full details and relevant forms are available on the Diocese of Limerick website at www.limerickdiocese.org

Vetting – Legal Requirements

Irish legislation requires persons involved in 'relevant' work to be Garda vetted. 'Relevant' work includes:

*Any work or activity as a minister or priest or any other person engaged in the advancement of any religious beliefs to children or vulnerable persons unless such work or activity is merely incidental to the advancement of religious beliefs to persons who are not children or vulnerable adults.
(National Vetting Bureau Acts 2012-2016)*

It is an offence to allow any person to be involved in relevant work with children or vulnerable adults without obtaining Garda vetting.

Vetting in the Diocese of Limerick is organised by the Diocesan Vetting Office, 061/350000 vetting@ldo.ie.

Vetting obtained by a different organisation e.g. GAA is not sufficient and does not permit the person to be involved in ministry in the diocese.

Church Requirements – Clergy

All steps must be taken to ensure a safe and nurturing environment within the Church for children.

For that reason, it is required that all those who engage in public ministry provide confirmation that they are in good standing. Before undertaking ministry, visiting clergy must make contact with the Bishop in a Diocese, Superior of a religious house and adhere to the requirements set out in this procedure.

All clergy (secular or religious, bishop, priest or deacon) who seek to minister in the Catholic Church in Ireland must be incardinated. This means that the cleric must belong to a diocese (or its equivalent in canon law), a personal prelature (such as Opus Dei), an institute of religious life (such as the Franciscans) or a society that has this faculty (such as the Society of African Missions).

Incardination has three main purposes:

1. It is pastoral; a cleric is ordained for the service of a particular Church to which he belongs;
2. It is an effective structure for maintaining discipline, creating a bond between the cleric and his competent superior;
3. It provides the individual cleric with a guarantee that his rights are protected.

In addition to this, the cleric must be in good standing and enjoy the faculties necessary to minister. In law, a faculty is the authority, privilege or permission to perform an act or function, for example, regarding the Sacraments of Penance or Marriage. Each local Bishop is responsible for ensuring that clergy who minister within his jurisdiction is in good standing. It is necessary for the Bishop to carry out certain checks to ensure that all clergy are in good standing prior to faculties being granted.

A. Procedure to be followed by Visiting Clergy from within or outside Ireland.

In advance of their visit and prior to undertaking any ministry in the Diocese of Limerick, visiting/applicant priests will:

1. Make a written request seeking permission of the Bishop to minister in the Diocese.
2. Provide details of the proposed visit, including dates, location and type of ministry being considered.
3. Complete a *Declaration of Good Standing Form* (Appendix 12);
4. Provides the name of his Bishop/Superior and the contact details of the Church Authority to which he is incardinated.

5. The Bishop acknowledges the request received from the applicant priest (Appendix 11).
6. The Bishop requests applicants' Bishop/Superior to provide written confirmation of Celebret and to complete a *Confirmation of Good Standing Form* (Appendix 13).

7. If the ministry involves contact with children or vulnerable persons, which is more than incidental, then the applicant priest must be vetted by the Diocese of Limerick. This is organised via vetting@ldo.ie (queries to Vetting Service in the Diocesan Office).

Clergy coming from parts of the world where a police vetting arrangement is not in place may seek to minister in Ireland. As a consequence, vetting arrangements are not always available as a means of confirming that there is no adverse information known about them that would prevent them from carrying out ministry in Ireland. In these circumstances, the Diocese will consider each situation based on available information.

8. On receipt of the necessary confirmations, and the Bishop is satisfied and there are no known concerns about the visiting cleric, a written approval for ministry is provided to the visiting cleric (Appendix 14).
9. A copy of the permission is forwarded to the Bishop/Superior of the visitor and to the parish priest or local superior of the relevant location of the ministry as outlined in the approval letter.
10. A copy of the permission is stored in the Diocesan office.

Full details and relevant forms are available on the Diocese of Limerick website at www.limerickdiocese.org

Procedure to be followed by Visiting Clergy from within or outside Ireland wishing to Minister at short notice at a once-off Event in the Diocese of Limerick

Should the cleric be present, at short notice, in a parish or diocese for a once-off event, such as a funeral, and his contact with children is only incidental, then he does not require to be vetted. However, he must:

1. Sign the register in the sacristy to declare his presence on a particular time and date.
2. Provide his celebret for inspection by the parish priest or duly delegated person (e.g. Sacristan), and this must be noted beside the visitor's signature in the register in line with the sacristy safeguarding protocol.

B. Procedure to be followed by visiting persons in any form of Consecrated Life within and outside Ireland (Non-ordained Religious)

1. Prior to their visit, where there is an intention to engage in public apostolic works, all visiting religious must write seeking permission of the Bishop, giving details about the duration of the visit, the type of ministry and the location of ministry being considered.
2. Contact details of the Church authority of the visiting religious must also be provided in advance.
3. Upon receipt of a request from the visiting religious to carry out apostolic works, the Bishop acknowledges same, (Appendix 11) and requests, in writing, a confirmation of good standing (Appendix 15), signed by their Church authority.
4. A vetting check must be processed through the Garda National Vetting Bureau; Vetting in the Diocese of Limerick is organised by the Diocesan Vetting Office, 061/350000 email: vetting@ldo.ie.
5. Once the Bishop is satisfied that there are no known concerns about the visiting religious, permission is given in writing to the visitor, outlining the specified ministry, including its duration and location (Appendix 14).
6. A copy of this permission is forwarded to the parish priest or local superior of the relevant location of the ministry outlined in the approval letter;
7. A copy of the permission is stored in the Diocesan office.

C. Procedure to be followed by Lay-Persons from outside the Diocese who wish to be involved in Apostolic Work within the Diocese of Limerick

1. Prior to their visit, where there is an intention to engage in public apostolic works within the Diocese, all lay people from outside the Diocese must write seeking permission of the Bishop.
2. Lay persons must complete Section 1 and 2 of the Application Form (Appendix 18) giving details on the duration of their visit, the type and location of apostolic work being considered, and their agreement, should their application be approved, to abide by the Safeguarding Policy and Procedures of the Diocese of Limerick.
3. On receipt of a request from the lay person wishing to carry out apostolic work, the Bishop acknowledges same (Appendix 19). The Bishop requests, in writing, a Confirmation of Good Standing (Appendix 20), signed by their Church Leader or Head of the relevant organisation to which the lay person belongs.
4. If the apostolic work involves contact with children or vulnerable persons, which is more than incidental, then the Lay Person must be vetted by the Diocese of Limerick. This is organised via vetting@ldo.ie (queries to Vetting Service in the Diocesan Office).
5. Once the Bishop is satisfied that there are no known concerns about the visiting lay person; the Bishop communicates his decision in writing (Appendix 14) to the Lay Person and the relevant local Parish/Organisation. The permission outlines the specified apostolic work, including its duration and location.
6. A copy of this permission is forwarded to the parish priest of the relevant location of the apostolic work as outlined in the approval letter.
7. A copy of the permission is stored in the Diocesan Office.
8. Approval for Ministry in the Diocese of Limerick (Appendix 14) is conditional on the lay minister agreeing to comply with Diocesan Policy and Procedures.

Training in Child Safeguarding

Training is a key component of the church's commitment to keeping children safe in all Church ministries. It is therefore important that those whose ministry involves contact with children and vulnerable persons are appropriately trained in child safeguarding.

Where a temporary ministry, involving children and vulnerable persons, is extended, the person in ministry must have undertaken the Full Day Training Programme on Child Safeguarding offered by the National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI) or an agreed equivalent in the case of clergy from outside Ireland.

The required training will be arranged through the Diocesan Safeguarding Office.

Requirement for Priests Wishing to Obtain Faculties to Minister within the Diocese of Limerick

Under canon law, a priest can minister in public once granted faculties by the competent ecclesiastical authority.

Each Bishop is responsible for ensuring that clergy who minister within the boundaries of their diocesan jurisdiction are in good standing.

Under canon law (Can. 265) every cleric must be incardinated either in a particular church or personal prelature, or in an institute of consecrated life or society endowed with this faculty, in such a way that unattached or transient clerics are not allowed.

It is required that all appropriate checks are carried out to ensure that clergy wishing to minister within the area of the Diocese of Limerick are in good standing and fit for ministry.

Priests, who are members of a religious community or are incardinated in another diocese or congregation and who are resident within the Diocese of Limerick, and who wish to minister within the Diocese, will apply for faculties to minister using the application form in Appendix 16 of this procedure.

Those intending to reside within the Diocese and who wish to minister will apply for faculties using the application form in Appendix 16.

Summary of requirements for Priests applying for faculties to minister within the Diocese of Limerick.

- Prior to their arrival in the diocese, applicant priests must write seeking permission of the Bishop to minister within the diocese. The priest will complete the Application for Faculties to Minister within the area of the Diocese of Limerick (Appendix 16) and provide a Declaration of Good Standing.
- The Diocese of Limerick will issue a Confirmation of Good Standing Form to the Bishop/Superior of the applicant priest (Appendix 17). The completed confirmation will be returned to the Bishop at the Diocesan Centre, St Munchins, Corbally, Limerick.
- If the Bishop is satisfied that there are no known concerns, permission to ministry within the Diocese of Limerick is communicated to the applicant priest and is also copied to his Bishop/Superior (Appendix 14).
- A copy of this permission is stored in the Diocesan office.

Visiting Clerics or Visiting Persons in Any Form of Consecrated Life Ministering at National Shrines and International Shrines

Definitions

A Shrine is a Catholic Church or other sacred place which with the approval of the local Bishop is by reason of special devotion frequented by the faithful as pilgrims (Canon 1230).

To be considered a National Shrine the approval of the National Episcopal Conference is necessary. For it to be described as International, the approval of the Holy See is necessary (Canon 1231).

For Visiting Clerics or those in any form of consecrated life, ministering in Shrines and National Shrines in Ireland

- Prior to the visit, where there is an intention to engage in public ministry, all visiting clerics and those in any form of consecrated life must adhere to Diocesan requirements set down for visiting Clergy, Non-ordained Religious and Lay Ministers.

In particular:

- If the visiting cleric is ministering at a one-off event which isn't considered a regulated activity the cleric must provide his celebret for inspection by the parish priest or duly delegated person and this should be noted beside the visitor's signature in the register.
- If the ministry is for a short term basis, the visiting cleric must follow the requirements set out in Diocesan procedure.
- If the ministry is being carried out by a non-ordained religious then the guidance outlined for the Diocese must be followed.

Visiting Clerics celebrating or concelebrating mass at Shrines outside Ireland

- If the Shrine is outside of Ireland all child safeguarding requirements of the organisation within which the ministry takes place must be followed, in accordance with **Guidance 2.1J set down by the NBSCCI**.
- The main celebrant must allocate responsibility for each cleric wishing to concelebrate to have their celebret cards checked to ensure they are in good standing.
- A cleric who is out of ministry due to child safeguarding concerns must not attempt to celebrate any sacrament in public while abroad.

Diocese of Limerick Vetting Policy and Procedure

Summary of key Elements

It is a criminal offence to allow anyone to engage in ministry with children or vulnerable persons, without being vetted.

The law states that vetting is required for any:

- work or activity which is carried out by a person, a necessary and regular part of which consists mainly of the person having access to, or contact with, children (and/or vulnerable persons).
- Any work or activity as a minister or priest or any other person engaged in the advancement of religious beliefs, to children (and vulnerable persons) unless such work or activity is merely incidental to the advancement of religious beliefs to persons who are not children (or vulnerable persons).

Therefore, anyone who is 18 or over and involved in ministry, employed/contracted or volunteering who has any contact with children and/or vulnerable persons which is more than incidental must be vetted. Those who are aged 16 years and under 18 years may be vetted, but this can only be carried out with the written consent of their parent/guardian and the young person themselves.

For other Church personnel whose contact with children and/or vulnerable persons is incidental, vetting is not required.

Deciding Who Needs to be vetted

The person appointing, contracting or permitting a person to be involved in Diocesan/Parish activity is responsible for ensuring that vetting takes place.

Example:

Eucharistic Ministers who only distribute the Eucharist within the main body of the church during public Mass or other liturgical celebrations do not need to be vetted.

However, Eucharistic Ministers who bring the Eucharist to homes, hospitals, care homes and other institutions where there are children and/or vulnerable persons present do need to be vetted.

Re-Vetting -The Dioceses of Limerick has a **3 Year Re-Vetting Policy** or more frequently if considered appropriate for the particular role.

Diocesan Vetting Service to Primary Schools

The Diocese of Limerick provides a vetting service for primary schools specifically for the vetting of non-teaching staff employed by the Board of Management of schools or engaged as volunteers by the Board or Management; see details on page 32.

Process for Person Resident in Ireland

- A copy of the e-Vetting Invitation Form (NVB 1) and Guidelines is available from the Diocesan Vetting Service 061 350000, to download www.limerickdiocese.org or email vetting@ldo.ie.
- The Applicant completes Sections 1 and 2. (Please ensure that the Form is completed fully and clearly).
- Section 3 to be completed by the Parish/Organisation's Contact Person i.e. person in charge of the Parish/Organisation.
- The Parish/Organisation's Contact Person must validate the identity of the applicant (**photographic proof of identification** and **proof of current address** original documents to be presented). In respect of Parish/Organisation copies to be attached to the e-Vetting Invitation Form (NVB1). In respect of schools copies to be retained by the school*Please see below Proof of Identity.

The completed e-Vetting Invitation Form (NVB 1) should then be posted to the Vetting Service at the Limerick Diocesan Centre, St. Munchins, Corbally, Limerick.

- Once the Vetting Invitation Form (NVB 1) has been processed the Applicant will receive an email directly from the National Vetting Bureau (NVB) which will give him/her access to their on-line Vetting Application Form (NVB 2).
- The Form (NVB 2) must be completed on-line within 30 day or the link will become inactive.
- Once Application Form (NVB2) is processed, the National Vetting Bureau will send a Disclosure to the Diocesan Liaison Person. In respect of Parish/Organisation the Disclosure is retained by the Diocese and the outcome is communicated in writing to the Parish/ Organisation Contact Person. In respect of schools the Disclosure is forwarded to the school
- No person should be engaged until correspondence is received from the Diocesan Office.

Proof of Identity

At least two forms of identification must be produced to validate the identity of the applicant when completing the e-Vetting Invitation Form (NVB 1)

- Photographic ID i.e. current passport or new format drivers licence
- Proof of Current Address i.e. original utility bill or bank statement (issued within the last six months)

If these are not available other forms of identification/proof of current address may be used as outlined in Section 3.

Each identity document is awarded a number of points. The combination of identity documents provided must result in a combined score of 100 or above as per Section 3, please see Proof of Identity Check List (Appendix 5). Where an individual cannot reach 100 points an affidavit witnessed by a Commissioner for Oaths will suffice.

Process for Person Resident Abroad – Clergy/Priest

- See Diocesan Policy for the relevant process

Diocese of Limerick Vetting Policy and Procedure

This section outlines who should be vetted and the procedures that apply in the Diocese of Limerick

Legislative Basis

Vetting is carried out through the National Vetting Bureau under the National Vetting Bureau (Children and Vulnerable Persons) Act 2012 to 2016.

From the date of commencement of the legislation in April 2016, it is a criminal offence to allow anyone to engage in ministry with children or vulnerable persons, without being vetted.

The National Vetting Bureau (Children and Vulnerable Persons) Act 2012 to 2016 sets out the circumstances in which vetting is required:

Any work or activity which is carried out by a person, a necessary and regular part of which consists mainly of the person having access to, or contact with, children (and/or vulnerable persons).

Any work or activity as a minister or priest or any other person engaged in the advancement of religious beliefs, to children (and vulnerable persons) unless such work or activity is merely incidental to the advancement of religious beliefs to persons who are not children (or vulnerable persons).

In other words, anyone who is 18 or over and involved in ministry, employed/contracted or volunteering who has any contact with children and/or vulnerable persons which is more than incidental must be vetted. Those who are aged 16 years and under 18 years may be vetted, but this can only be carried out with the written consent of their parent/guardian and the young person themselves.

For other Church personnel whose contact with children and/or vulnerable persons is incidental, vetting is not required.

For the Purposes of the Vetting Legislation

“child” means a person under the age of 18 years

The current definition of a vulnerable adult within the Republic of Ireland is taken from “The National Vetting Bureau (Children and Vulnerable Persons) Act 2012” which states:

“vulnerable person” means a person, other than a child, who:-

- a. is suffering from a disorder of the mind, whether as a result of mental illness or dementia;
- b. has an intellectual disability;
- c. is suffering from a physical impairment, whether as a result of injury, illness or age, or
- d. has a physical disability, which is of such a nature or degree;
 - i. as to restrict the capacity of the person to guard himself or herself against harm by another person, or
 - ii. that results in the person requiring assistance with the activities of daily living including dressing, eating, walking, washing and bathing.

Deciding Who Needs to be Vetted

The person appointing, contracting or permitting a person to be involved in Diocesan/Parish activity is responsible for ensuring that vetting takes place. The key issue is to focus on what the person will be doing, for example:

Eucharistic Ministers who only distribute the Eucharist within the main body of the church during public Mass or other liturgical celebrations do not need to be vetted.

However, Eucharistic Ministers who bring the Eucharist to homes, hospitals, care homes and other institutions where there are children and/or vulnerable persons present do need to be vetted.

Examples of Roles that typically will require Vetting:

- Clergy (Bishops, Priests, Deacons), Chaplains;
- Sacristans, Parish Secretaries and Diocesan Staff;
- Youth Group Leaders such as those responsible for youth choirs, parish run youth clubs, Pope John Paul II Award leaders, youth liturgy groups, etc.;
- Supervisors of Altar Servers;
- Leaders of Communion Programme: “Do This in Memory of Me”;
- Leaders of Confirmation Programme: “You shall be my witnesses”;
- Those whose ministry, work, activity, includes the coaching, mentoring, counselling, teaching or training of children and/or vulnerable persons;
- All other roles that bring a person into contact, which is more than incidental, with children and/or vulnerable persons through his/her ministry, work or activity.

Vetting is not required for Church personnel whose contact with children and/or vulnerable persons in unregulated activity is ‘merely Incidental’

Examples of Roles that typically may Not Require Vetting

- Collectors, Car park attendants, gardeners, cleaners etc.:
- Those present in the Sacristy who don’t have an official role with children and/or vulnerable persons. (Note: However, these persons should never be left alone with children and/or vulnerable persons);
- Readers of the Word.

Diocesan Vetting Service to Primary Schools

Vetting for Primary Teachers is provided through the Teaching Council

The Diocese of Limerick provides a vetting service for primary schools that operate under the patronage of the Bishop of Limerick. This service is specifically for the vetting of non-teaching staff employed by the Board of Management of schools or engaged as volunteers by the Board or Management.

Examples of such staff are:

Special Needs Assistants, Secretaries, Cleaners, Caretakers, School Volunteers. Chairpersons of the Board of Management must also be vetted by the Diocesan Vetting Service.

The decision on who is required to be vetted lies with each school Board of Management, and each school should familiarise itself with the Department of Education and Skills circulars and guidance.

Persons must be subject to vetting if they have or are expected to have access to, or contact with children and/or vulnerable persons. As each school/Board of Management is an individual employer, it must satisfy the vetting requirements i.e. each school must obtain a vetting disclosure before employing a person or permitting the applicant on school premises where they may have access to or contact with children or vulnerable persons.

The Diocese cannot provide a vetting facility for persons providing services to the school who are not employed by or engaged by the Board of Management of the school. Therefore, the Diocese suggests the following:

- **Volunteers who are coming from other Organisations** - for example the GAA, vetting will normally be undertaken by that organisation who will confirm in writing to the school that it has been undertaken in accordance with current Garda vetting requirements and the vetting does not contain any disclosure/specified information which would render the staff/volunteer(s) unsuitable to carry out relevant work/activities with children and/or vulnerable adults.
- **Any External Contractor** - for example photographer etc. providing a service he/she must ensure and confirm, in writing, to the school that they have been vetted, and the vetting does not contain any disclosure/specified information which would render the staff/volunteer(s) unsuitable to carry out relevant work/activities with children and/or vulnerable adults.
- **Students (post-primary or third level)** - coming on any type of school placement/work experience to a primary school. It is the responsibility of the placing organisation to obtain vetting and confirm same, in writing, to the school, and the vetting does not contain any disclosure/specified information which would render the staff/volunteer(s) unsuitable to carry out relevant work/activities with children and/or vulnerable adults.
- **All those using the school facilities in their own right After School Hours** - must obtain vetting other than through the Diocese of Limerick. The relevant organisation must provide written confirmation to the school that the operator has been vetted in accordance with current Garda Vetting requirements and the vetting does not contain any disclosure/specified information which would render the staff/volunteer(s) unsuitable to carry out relevant work/activities with children and/or vulnerable adults.

Staff employed before April 2016 who have not been vetted must be vetted by December 2017. Teaching staff that fall into this category shall be vetted by the Teaching Council.

The provisions in relation to re-vetting have not as yet been commenced and therefore it is a matter for each organisation to decide on its policy regarding re-vetting.

The Diocese of Limerick now uses the online system of Garda Vetting

The following sets out the steps involved in completing the Vetting Invitation Form (NVB1) which can be found at [Appendix 5](#) on the Diocesan Safeguarding Website

<http://www.limerickdiocesessafeguarding.com>

- The applicant completes Section 1 and Section 2 and provides **photographic proof of identification** and **proof of current address**
- The Chairperson of the Board of Management or Principal (i.e. Contact Person) completes Section 3.
- Please note that in order for the Diocese to process the invitation, the Chairperson or Principal must validate the identity of the applicant (**photographic proof of identification** and **proof of current address** to be presented and copies to be sent to the Vetting Service with the **NVB 1** and also kept on file by the school). *Please see below Proof of Identity.
- The completed Vetting Invitation Form (NVB 1) should be posted to the Vetting Service at the Limerick Diocesan Centre, St. Munchins, Corbally, Limerick for processing.
- The applicant will receive an email directly from the National Vetting Bureau (NVB) to the email address provided on the NVB 1, which will give him/her access to their on-line Vetting Application Form (NVB 2)
- The Form (NVB 2) must be **completed on-line within 30 day** or the link will become inactive.
- Once Application Form (NVB2) is processed, the National Vetting Bureau will send a Disclosure to the Diocesan Liaison Person who will forward the Disclosure to the school Contact Person.
- Please note that **no applicant can commence the role/position** until this Disclosure is returned to the school Contact Person

Note: The Liaison Person can only respond to communication from the school contact person under the current **Data Protection Legislation**.

General queries in relation to vetting - should be directed to St Senan's Education Office
Tel: 061-347777 or the CPSMA Tel: 1850 407 200

Note: The Diocesan Appeals process does not apply to Primary Schools, who need to have their own appeals arrangements.

* **Proof of Identity**

An applicant must provide photo ID and proof of current address

At least two forms of identification must be produced:

- **Photographic Identification** i.e. current passport or new format drivers licence
- **Proof of Current Address** i.e. original P60 or P45, utility bill (issued within the last six months) or bank/building society/credit union statement

If these are not available other forms of identification/proof of current address may be used as outlined in Section 3 of the NVB 1 Form.

Each identity document is awarded a number of points. The combination of identity documents provided must result in a combined score of 100 or above as per Section 3.

Where an individual cannot reach 100 points an affidavit witnessed by a Commissioner for Oaths will suffice.

How the Diocesan Vetting Process Operates

Applications for Garda Vetting are now submitted electronically in a process known as **e-Vetting**. The National Vetting Bureau (NVB) is no longer accepting paper applications.

Please find below the relevant forms, downloads and an outline of how the e-Vetting process works.

For all related queries please contact: The Diocesan Vetting Service **Tel: 061 350000 Email:**

vetting@ldo.ie

The Process for Persons Resident in Ireland

- A copy of the e-Vetting Invitation Form (NVB 1) and Guidelines is available from the Diocesan Vetting Service 061 350000, to download www.limerickdiocese.org or email vetting@ldo.ie.
- The Applicant completes Sections 1 and 2. (Please ensure that the Form is completed fully and clearly).
- Section 3 to be completed by the Parish/Organisation's Contact Person i.e. person in charge of the Parish/Organisation.
- The Parish/Organisation's Contact Person must validate the identity of the applicant (**photographic proof of identification** and **proof of current address** original documents to be presented) and copies to be attached to the e-Vetting Invitation Form (NVB1). *Please see below Proof of Identity.
- The completed e-Vetting Invitation Form (NVB 1) should then be posted to the Vetting Service at the Limerick Diocesan Centre, St. Munchins, Corbally, Limerick.
- Once the Vetting Invitation Form (NVB 1) has been processed the Applicant will receive an email directly from the National Vetting Bureau (NVB) which will give him/her access to their on-line Vetting Application Form (NVB 2).
- The Form (NVB 2) must be **completed on-line within 30 day** or the link will become inactive.
- Once Application Form (NVB2) is processed, the National Vetting Bureau will send a Disclosure to the Diocesan Liaison Person The Disclosure is retained by the Diocese and the outcome is communicated in writing to the Parish/ Organisation Contact Person
- No person should be engaged until correspondence is received from the Diocesan Office.

The Process for Persons Coming from Abroad

- Vetting or equivalent police clearance is required of religious/clergy involved in ministry, in respect of periods of six months or more resident abroad.
- A copy of the e-Vetting Invitation Form (NVB 1) and Guidelines is provided to the Applicant by the Bishop/Superior of the Religious Congregation.
- The Applicant completes Sections 1 and 2. (Please ensure that the Form is completed fully and clearly).
- Section 3 is to be completed by the Bishop/Superior of the Religious Congregation
- The Applicants presents **photographic proof of identification** and **proof of current address** (original documents to be presented) for verification by the Bishop/Superior of the Religious Congregation. Copies of all identification documentation to be attached to the e-Vetting Invitation Form (NVB1) * Please see below Proof of Identity.
- The completed e-Vetting Invitation Form (NVB 1) should then be posted to the Vetting Service at the Limerick Diocesan Centre, St. Munchins, Corbally, Limerick.

- Once the application has been processed the Applicant will receive an email directly from the National Vetting Bureau (NVB) which will give him/her access to their on-line Vetting Application Form (NVB 2).
- The Form (NVB 2) must be completed on-line within 30 day or the link will become inactive.
- Once Application Form (NVB2) is processed, the National Vetting Bureau will send a Disclosure to the Diocesan Liaison Person who will communicate, in writing, the outcome to the Parish/Organisation Contact Person
- The Diocesan Liaison Person will communicate the vetting outcome, in writing to the Bishop/Superior of the Religious Congregation

* **Proof of Identity**

A vetting applicant must provide photo ID and proof of current address

At least two forms of identification must be produced by the applicant when completing the e-Vetting Invitation Form (NVB 1)

- **Photographic ID - i.e. current passport or new format drivers licence**
- **Proof of Current Address i.e. original utility bill or bank statement (issued within the last six months)**

If these are not available other forms of identification/proof of current address may be used as outlined in Section 3 of the NVB 1 Form.

Each identity document is awarded a number of points. The combination of identity documents provided must result in a combined score of 100 or above as per Section 3, please see Proof of Identity Check List (Appendix 5).

Where an individual cannot reach 100 points an affidavit witnessed by a Commissioner for Oaths will suffice.

E-mail

The applicant must provide a valid email address. If the applicant does not have their own email address they can provide an email that their form may be sent to. This can be the email of a friend or family member or one can be provided for the applicant by the Parish/Organisation requesting the vetting. If the applicant does not have access to an electronic device one should be provided for the applicant by the Parish/Organisation requesting the vetting to enable them complete the online NVB2 Form.

Role Being Vetted for

Please provide a full description of the role being applied for on the e-Vetting Invitation Form (NVB 1). It is not sufficient to state 'volunteer'. The role must be specified, such as, 'Leader of Children's Choir'. If the applicant carries out multiple roles he/she should state, the one that involves most contact with children or vulnerable persons.

Minors

The legislation is directed at applicants aged 18 years or over at date of signing the form. Applications can be made for those aged 16 and 17 years of age. The decision to vet 16 and 17 year olds is a policy decision for the Parish/Organisation in question and this is not a legal requirement. Where an application is being made for a 16-17-year-old, the consent of the parent/guardian must also be obtained and Consent Form (NVB3) must be completed in addition to the NVB1.

Parent and Guardian Consent

The email address and telephone number of the parent/guardian (not the young person) must be provided when the applicant is completing NVB1. Form NVB3 is completed by the parent/guardian. Proof of identity and current address must be obtained for the parent/guardian and the young person.

Re-Vetting

The Dioceses of Limerick has a **3 Year Re-Vetting Policy** or more frequently if considered appropriate for the particular role.

Retrospective Vetting

Section 21 of the Act, which commenced in April 2016, concerns retrospective vetting of employees, volunteers and others who have never previously been vetted and who are already (i.e. prior to April 2016) employed, contracted, permitted or placed by the Church to undertake relevant work or activities with children or vulnerable persons. Church Authorities are required to ensure that applications for statutory vetting have been made in respect of all such persons before 31 December 2017.

Visiting Priests & Clergy

Visiting priests and clergy can apply for vetting in advance

Vetting is required in both jurisdictions where a member of the Church ministers across Northern Ireland and the Republic of Ireland.

E-Vetting Invitation Form (NVB 1) and Guidelines are available from the Diocesan Vetting Service 061 350000, to download www.limerickdiocese.org or email vetting@ldo.ie and Appendix 5.

The Invitation Form (NVB1) that the applicant completes, gives permission for a vetting disclosure to be obtained and shared with the relevant personnel in the Parish/Organisation, in line with Data.

Please Note the On-line Vetting Application Form (NVB 2) is only issued to the Applicant. The Organisation (Diocese/Parish/School/Diocesan Agency) does not have access to this Form.

Parent/Guardian Consent Form (NVB 3) is required for applicants under 18 years of age where vetting is applicable

On Receipt of a Vetting Disclosure from the Vetting Bureau

The vetting Disclosure must be assessed by the employing/appointing person (parish priest, chair of board of management, etc.) to consider if any information disclosed might affect the engagement of the person. Personnel accessing vetting disclosures must also observe confidentiality.

If the vetting disclosure contains information that might mean an applicant may be unsuitable for the post, the “employer/appointing person” must make a copy of the disclosure available to the applicant to establish first that the identity details are correct, and second, whether the information shared means that the application must not precede

Two types of information may be disclosed:

1. Criminal record information
2. Specified information, for example information provided by Tusla or the H.S.E. to An Garda Síochána

The “employer/appointing person” will:

- assess the information returned from the National Vetting Bureau
- decide if there is any reason not to employ, contract or engage the applicant, from a criminal information or specified information perspective
- Inform the applicant of the decision

If the applicant wishes to appeal the decision, the employer/appointing person must set up a review meeting (see Appeals).

In this instance the employer/appointing person for a Parish or Diocese may request support from the Safeguarding Service on how to proceed.

The schools process and appeals is a matter for the school authority.

Appeals

In respect of decisions based solely on the Vetting Disclosure

It must be noted that any appeal can only be made in relation to the decision not to employ, contract or engage the applicant on the grounds that they are not suitable to work with children and/or vulnerable persons, based solely on the vetting disclosure.

If the applicant wishes to appeal the decision, they should be informed in writing about the process of an appeal.

An Appeals Committee has been established by the Diocese to hear appeals; the final decision regarding the appeal rests with this Appeals Committee. Note: This only applies to Diocesan positions and not to Schools.

The National Vetting Bureau (Children and Vulnerable Persons) Act 2012 states that the information contained in the vetting disclosure made to the organisation shall not be used other than in accordance with the Act. Any breach of this requirement is an offence.

An applicant will be told that the appeal process will require that information disclosed to the National Vetting Bureau can be shared with the panel members, and that any representations made by him/her may be shared with the statutory authorities. Any detail provided, for example to explain the background to a conviction, may be shared with the National Vetting Bureau to ensure it is a realistic representation of the facts.

Representation from the applicant will be requested in writing to offer them the opportunity to explain any circumstances in relation to the information received that might further inform the appeals panel. The panel will arrange an oral hearing if the applicant wishes.

The role of the appeals panel is to decide if the original decision was reasonable or unreasonable, and to confirm or overturn the decision.

Role of Appeals Panel

- To receive and hear requests for review of decisions not to appoint on the basis of information received through the vetting process;
- To review any oral or written information provided by the applicant and relevant Church personnel, if deemed appropriate;
- To make a judgement regarding whether the decision not to employ/appoint was reasonable and to consider if:
 - The decision to refuse was based on a potential risk to children and/or vulnerable persons
 - The relevance of the specific role was taken into consideration?
 - Make the final decision regarding the appeal.

Time Frame

- An appeal must be lodged with the “employer/appointing person” within twenty-eight days of being informed of the decision not to appoint. The applicant will be asked to provide written representation within fourteen days of receipt of correspondence requesting this. Failure to provide this information within the time frame suggested, or failure to seek an extension, will result in the matter being closed and the original decision standing.
- The appeals panel will aim to review all information within fourteen days of receipt of same, make its decision and communicate its decision to the applicant.

Diocesan Vetting Service - Terms of Reference

- Executive responsibility is held by the Director of Safeguarding
- The Vetting Committee is advisory in relation to policy, procedures, organisation and approach.
- A Consultative Group is brought together as required to advise on policy issues.
- The role of the Vetting Appeals Committee is as outlined above
- In the event that any member has any conflict of interest, this should be declared in advance of any meeting to the Director of Safeguarding and that member may be required to absent themselves from part of the meeting
- The composition of the Vetting Committee is as follows:

Vetting Committee

Mr. John Murphy *Chairperson*
Mr. Ger Crowley, Director of Safeguarding
Liaison Persons

Vetting Consultative Group

Mr. John Murphy *Chairperson*
Mr. Ger Crowley Director of Safeguarding
Liaison Person
Fr Michael Cussen *Parish Priest*
Ms. Patricia O'Rourke *Parish Representative*
Mr. Derek Heverin *Parish Representative*
Any other person who may, from time to time, be appointed by the Bishop

Vetting Appeals Committee

Very Rev Donough, Canon O'Malley *Chancellor*

Mr. Terry Boyle, *Parish Support Worker*

Ms. Winnie Davern, *Administrator*

Any other person who may, from time to time, be appointed by the Bishop

The Diocesan Complaints Officer may also make a proposal in relation to any resolution or other appropriate actions, for example, an apology. The Diocesan Complaints Officer may also issue a recommendation in relation to any relevant change in practice. Note: The Diocesan Complaints Officer may seek the assistance of personnel with expertise relevant to the nature of the complaint.

Codes of Behaviour for Adults

The recruitment of suitably qualified and experienced personnel is a vital aspect of the Church's child safeguarding policy. However, in order to maintain a high level of child protection awareness and safe care, codes of behaviour are equally important.

A code of behaviour is a clear and concise guide to what is and is not acceptable behaviour and practice when working with children. It is an essential part of the safeguarding procedures of any Diocese that has ministry with children. Adults working with children have a duty of care to children. Church personnel who work with children should sign a code of behaviour (if it is not contained in the overall safeguarding policy) to indicate that they have seen the code and agree to follow it in full from commencement of their work within the Church.

It is very important that everyone in the Diocese is clear about what is and is not acceptable behaviour when working with children. It is also important to involve children and parents/guardians in the process of developing a code of behaviour. When considering what sorts of behaviour are appropriate in dealing with children, it is important to bear in mind that the intentions of adults are less important than the impact of their behaviours on children. For this reason, a key aspect of any code of behaviour is the creation of an environment where it is safe for children to ask questions and express their concerns, confident in the knowledge that what they say will be heard, taken seriously and acted upon.

In general, codes of behaviour should contain:

- Positive statements indicating what sorts of behaviours are appropriate, e.g. listening;
- An awareness of the scope of bullying and how to cope with the problem, as it may occur in any group context;
- Prohibitions indicating behaviours that are never acceptable, e.g. hitting a child;
- Good practice guidelines that indicate what is generally acceptable or unacceptable, but that also allow for exceptions, e.g. in a medical emergency; taking a child in your car without a second member of staff/adult if there is no one else around.

Where it becomes necessary to depart from the code of behaviour, the reasons for doing so should be carefully recorded, and steps should be taken to avoid the recurrence of such a situation in the future.

The Diocese of Limerick has adopted the Code of Behaviour for Adults set out by the National Board for Safeguarding Children. That code is incorporated in the application form for General Church Ministry (Appendix 8) which is part of this Procedure. It should be read in conjunction with guidance on one-to-one contact with children and young people on page 44 of this procedure

Code of Behaviour for Children and Young People Involved in Parish/Diocesan Events

The Code of Behaviour for Children and Young People outlines the behaviour expected from them while participating in Parish youth events.

Children and young people deserve to be respected and treated fairly. They have a right to express their opinions and to have their voices heard and we should endeavour to include children/ young people and their parents in any decision making process that will affect them. Therefore, it is recommended to include the children/young people in drawing up a Code of Behaviour using the Guidance below. This could give the children / young people more ownership of the Code of Behaviour. They could even make a poster that they all sign and display on the wall where you gather.

It is also a good idea to read out the Code of Behaviour occasionally at the beginning of events to remind young people about what it is they have agreed to adhere to.

Children / Young People should always be made aware of whom they can talk to if they have a problem or concern.

This Code of Behaviour is included on the Diocesan General Church Ministry Form at (Appendix 8) in this document.

Guidance to be followed for any trips away with children and young people is addressed on page 50 of this procedure document.

Creating a Code of Behaviour with Children

Children should be involved in drawing up a code of behaviour for themselves; however, it is important that in working with children, an appropriate adult with relevant skills and competencies participates to support them in developing the code of behaviour.

The methods used in creating a code of behaviour should be age and ability appropriate, with children being encouraged to avoid merely drawing up a list of prohibitions. Instead, the code should be comprised of positive statements about respect, and should consider what consequences ensue if the code is broken.

In developing the code, consideration should be given to the following:

- Treating everyone with respect;
- Treating property with respect;
- Not consuming alcohol, tobacco or illegal drugs;
- Agreeing not to bring any physical item into the Church activity that may cause offence or harm to others;
- Acting as a good role model;
- Attending activities on time;
- Signing in and out;
- Turning off your mobile phone;
- Telling someone you trust if you feel uncomfortable with any situation or individual;
- Not using bad language when communicating by phone or email;
- Never bullying anyone or sending threatening messages;
- For an example of a workshop to create a code of behaviour with children, refer to Appendix 21.

Dealing with Breaches of Codes of Behaviour for Children and Adults

If a child/young person or an adult breaches the code of behaviour, efforts should be made to resolve the issue by:

- Discussion with and support for the adult or the child/young person;
- A child/young person or adult may be asked to apologise for their behaviour;
- In the case of a child/young person, involving their parents/guardians;
- Agreeing on sanctions.

Sanctions may include:

- Time out of group activity;
- For children/young people, a parent/guardian may be asked to attend group activities with their child for a period of time;
- For adults, retraining in leadership skills, code of behaviour, etc. may be required;
- For children/young people, the code of behaviour should be revisited and agreed upon;
- Monitoring behaviour and support on an ongoing basis;
- In serious cases, suspension or even exclusion from the group should be considered;
- Formal reporting to statutory authorities.

Safe Care for Children

Our generation will show that it can rise to the promise found in each young person when we know how to give them space. This means that we have to create the material and spiritual conditions for their full development; to give them a solid basis on which to build their lives; to guarantee their safety and their education to be everything they can be; to pass on to them lasting values that make life worth living; to give them a transcendent horizon for their thirst for authentic happiness and their creativity for the good; to give them the legacy of a world worthy of human life; and to awaken in them their greatest potential as builders of their own destiny, sharing responsibility for the future of everyone. If we can do all this, we anticipate today the future that enters the world through the window of the young.

– Pope Francis (2014)

To build a safe and solid environment for children, each Church authority must strive to be child-centred in their practice and behaviour. In practical terms, this will include clear written procedures outlined in the following templates and guidance documents.

A: Guidance on **Safe Care** for Children

- Template 1: Attendance Register for Large Groups (Appendix 22)
- Template 2: Attendance Register for Sacristy. (Appendix 23)
- Template 3: Child and Guardian Joint Consent (Appendix 24)

B: Guidance on **One-to-One Contact** with Children and Young People is included on Page 44, of this procedure document.

C: Guidance on Dealing with **Accidents**, (page 46).

- Template 1: Form for Dealing with Accidents/Incidents (Appendix 25)

D: Guidance on Maintaining Adequate **Supervision** Ratios (page 47).

E: Guidance on the Participation of Children with **Specific Needs** (page 48)

F: Guidance on **Trips Away** with Children and Young People (page 50)

E: Guidance on the **Pope John Paul II** Award (page 55)

One-to-One Contact with Children and Young People

In general, Church activities should not involve one-to-one contact, and should usually be supervised by at least two adults (NBSCCCI 1.4C). However, there may be two circumstances where this may occur:

1. In a reactive situation, for example, when a young person requests a one-to-one meeting with you without warning, or where a young person has had to be removed from a group as part of a code of behaviour (refer to guidance on page 44, and Appendix 21 of this procedure;
2. As part of a planned and structured piece of work (for example, one-to-one music tuition).

The points below provide some guidance in relation to these situations.

Reactive situations

- If you need to talk to a young person alone, try to do so in an open environment, in view of others.
- If this is not possible, try to meet in rooms with visual access, or with the door open, or in a room/area where other people are nearby. You should advise another adult that such a meeting is taking place and the reason for it. A record should be kept of these meetings – including names, dates, times, location, reason for the meeting and outcome – and stored appropriately and securely as set out in Appendix 33 of this procedure and Appendix B of the National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI) Guidance advice.
- Avoid meetings with individual children where they are on their own in a building.
- One-to-one meetings should take place at an appropriate time, e.g. not late at night, and in an appropriate venue.

Planned and structured pieces of work

- The particular activity should have a clear rationale and aims for involving one-to-one work.
- Parents/guardians must be fully informed as to the nature and purpose of this work, and must give written consent as set out in Appendix 24.
- A clear code of behaviour must be agreed and adhered to by both parties. This should include limits of confidentiality and safeguarding procedures as in Appendix 21.

Intimate Care Policy

- Intimate care is any care which involves washing, touching or carrying out an invasive procedure to intimate personal areas. The issue of intimate care is a sensitive one and requires everyone involved to be respectful of a child's needs. The person's dignity should always be preserved with a high level of privacy, choice and control. There should always be a high awareness of safeguarding issues, with behaviour being open to scrutiny and undertaken in partnership with parents and guardians and with the child.

- Diocesan personnel are not ordinarily involved in the provision of intimate care and consequently are not authorised to undertake such care, without the explicit approval of the person with overall responsibility for the activity. It is recognised however that on occasion the need for intimate care may arise. The provision of such care should ordinarily be limited to suitably qualified personnel, such as nurses and doctors who will follow their own professional codes.
- The provision of intimate care must always be carefully planned, with an emphasis on supporting people to achieve the highest level of autonomy that is possible. The need for intimate care support will wherever possible be anticipated and be the subject of written agreement with the parents/guardians and the child in advance (Appendix 21). In this, planning consideration will be given to determining how many carers may be involved, and where possible one adult will be assigned. Ideally there will be a rota of carers which is aimed at ensuring that over-familiar relationships are discouraged from developing, whilst at the same time guarding against the care being carried out by a succession of completely different carers.
- Wherever possible intimate care should be provided by a person of the same sex, subject to the wishes of the person receiving the intimate care.
- If a child becomes distressed or unhappy about being cared for by a particular person this should be discussed with the parents/guardians and the safeguarding representative. Any allegations or complaints should be reported as part of the Diocesan Safeguarding Policy.
- Health and Safety issues may arise when changing a child or dealing with accidents. One should always wear an apron and gloves when dealing with blood or human waste. Any soiled material should be disposed of in sealed polythene waste disposal bags or equivalent.
- Physical contact should generally take place within a culture of limited touch. Any physical contact should only be in response to the needs of the child, be of limited duration and appropriate to age, stage of development etc. All physical contact must be open to scrutiny and every effort should be made to ensure that contact is not intrusive or subject to misinterpretation.

Dealing with Accidents

It is essential that all Church personnel (clergy, religious or lay volunteers) are familiar with the procedures outlined below. If a child has an accident and injures himself/herself while attending a Church-run event, these procedures should be followed:

1. Assess the injury and reassure the child. If the injury is severe or the child has lost consciousness, please contact the emergency services immediately by phoning 999 or 112. You can phone 112 from a mobile that has no credit and even from a phone that has no SIM card. The 112 emergency number is a European emergency number and can be called from anywhere in Europe. If the emergency services are to be called, contact with the child's parents/guardians must be made urgently. Contact information should be found on the child's membership/consent form. If the parents/guardians are not available, it may be necessary for a leader to travel with the child to the hospital. If medical treatment is required, Church personnel may be asked about known allergies or existing medical conditions. Again, this information should be found on the child's membership/consent form;
2. If the injury is minor, local application of treatment should be available from the first aid box. There should be a fully stocked first aid box to hand at all Church-related events. Remember to make a note of what has been used from the first aid box so that it can be replaced at the earliest opportunity. Under no circumstances should any medication be given to a child;
3. As soon as possible after the accident, write up a report using an accident/incident report form (Appendix 25). Once completed, this form should be stored in a safe place, in line with data protection, and treated as a confidential document;
4. Always inform parents/guardians of any accident that has occurred involving their child, regardless of how minor you consider it to be. It is good practice to give a copy of the accident/incident report form to parents/guardians;
5. It is good practice to keep blank copies of the accident/incident form with the first aid box so that one can be easily filled out in the event of an emergency.

Maintaining Adequate Supervision Ratios

In planning a trip or activity, it is critically important to consider how many adults are needed to supervise children in a safe manner. It is recommended that a certain number of adults be available to supervise a certain number of children; however, this is also dependent on whether the children have specific needs or requirements, and on the duration of the activity.

At a minimum, two adults are required for each activity.

In addition, the minimum following ratios should be applied, depending on the number of children:

- zero to one years = one member of staff to three children
- one to two years = one member of staff to five children
- two to three years = one member of staff to six children
- three to six years = one member of staff to eight children
- seven to twelve years = one member of staff to eight children
- thirteen to eighteen years = one member of staff to ten children

Child Age Range	Children Nos	Staff Required
0 - 1	3	1 staff
1 - 2	5	1 staff
2 - 3	6	1 staff
3 - 6	8	1 staff
7 - 12	8	1 staff
13 - 18	10	1 staff

If it is an overnight activity, additional staff/volunteers should be considered. If the group is mixed, a gender balance should be maintained.

Adult volunteers must have submitted the correct application form, obtained Garda vetting, taken part in induction and training appropriate to their role.

Participation of Children with Specific Needs

Some children have specific needs that place additional responsibilities on those who care for and work with them. It is often the situational and environmental factors that disable the child, rather than the physical or intellectual difficulty the child experiences. Where possible, the environmental factors should be adapted to the child's needs. Prohibitive attitudes need to be addressed through education and information.

Children who have a disability have the same rights as any other child, in line with the UN Convention on the Rights of the Child.

Points to consider when including a child with specific needs in your group:

- Work in partnership with the child, parents/guardians and any professionals involved to establish how the child can be included;
- Make sure inclusion is possible before bringing the child into the group;
- Make reasonable adjustments;
- Be interested in the child and build a rapport with them;
- If the child has a communication impairment, acquiring some key skills in their communication method will be useful;
- Some specific training may be useful or required, e.g. the autistic spectrum, epilepsy and others;
- Risk assessments may be necessary to ensure the safety of some children with specific needs;
- Higher staff ratios may be required if the child has additional needs or behavioural problems;
- Intimate care issues: when introducing a child with specific needs into an activity, it is important to establish if they have intimate care needs, and who should provide or assist with this if it is necessary. It is important to remember that not every child with a disability has intimate care needs. Intimate care is, to some extent, individually defined and varies according to personal experience, cultural expectations and gender. It may be described as help with anything of a personal or private nature that the individual is unable to do themselves;
- Children with specific needs may be more likely than other children to be bullied or subjected to other forms of abuse, and they may also be less clear about physical and emotional boundaries;
- It is particularly important that children with specific needs are carefully listened to, in recognition of the fact that they may have difficulty expressing their concerns, and so that the importance of what they say is not underestimated.

Generally, Church personnel are not expected to be involved in the provision of intimate care of children. This should be undertaken by suitably qualified people. Decisions regarding who provides intimate care for a child should be discussed and agreed by everyone concerned: the child's views should be ascertained; parents/guardians should be consulted and their consent sought; a rota of carers of the same sex as the child should be agreed; and the age, stage of development and ethnicity of the child will need to be considered. Most importantly, it should be agreed in advance who will carry out intimate care and how it should be done. Guidelines to be

borne in mind when providing intimate care include: the sensitive nature of such tasks; the need to treat every child with dignity and respect; the need to ensure an appropriate degree of privacy; the need to involve the child as much as possible in their own care; and trying to ensure consistency in who provides care.

If a child appears distressed or unhappy, this should be discussed with parents/guardians, if appropriate, and the activity leader. Any concerns or allegations should be reported following the procedures outlined in the safeguarding policy and procedures document of the Diocese.

Trips Away with Children and Young People

Introduction

Trips away that involve young people can be an extremely rewarding and fulfilling experience for adults and children/young people involved. However, to do this safely and in a way that safeguards all concerned requires careful planning and consideration. Diocesan procedure must be followed at all times. Listed below are a number of areas that should be considered in planning a trip away.

Considerations for Planning Trips Away

Have you:

- Identified the aim and outcomes of the programme?
- Followed your Diocese's child safeguarding policy and procedures?
- Carried out a hazard assessment as set out on page 52 and (Appendix 29).
- Recruited and selected staff/volunteers using safe practice procedures (Appendix 4).
- Selected a key staff member who has overall responsibility for the trip?
- Selected staff for the trip who are appropriately trained, qualified and vetted (if appropriate) as set out in Diocesan procedure.
- Nominated a staff member who is responsible for first aid.
- Ensure that you have adequate and gender-based supervision in line with your safeguarding policies and procedures.
- Appointed a contact person at home who has access to all information and contact details?
- Checked your own insurance and ensured that you have coverage for all activities?
- Checked that the transport has appropriate insurance, qualified drivers and seatbelts?
- Carried out an equipment safety check?
- Checked the first aid kit?
- Ensured there is a contingency plan?
- Made provisions for returning home early?
- Allocated a budget and contingency fund?
- Checked out the locations and accommodation of the trip away to ensure they have:
 - Appropriate safeguarding policy, practices and procedures in place?
 - Insurance cover?
 - Appropriately trained and qualified staff?
 - Changing areas of boys and girls (if required)?
 - Disability access (if required)?

Have the young people/participants:

- Been involved as much as possible in the planning of the trip
- Agreed a code of behaviour.
- Agreed boundaries around unstructured time?
- Identified the aim and outcomes of the programme?
- Been given information on appropriate clothing, and contact details for leaders?
- Consented to the trip away (Appendix 24).

Have parents/carers:

- Met with leaders and been informed of the programme?
- Been given a copy of the Diocese's child safeguarding policy and procedures?
- Consented in writing (Appendix 24)
- Given contact details, medical details including allergies, illnesses, medications and dietary requirements, (Appendix 24)
- Been given contact details of the leaders and centre?
- Been given details for pick up and drop off of young people/participants?

Have staff:

- Been trained on the Diocese's code of behaviour and child safeguarding policy, on how to deal with a disclosure, and on dealing with challenging behaviour.
- Been assigned responsibilities and scheduled for breaks?
- Been made aware of how to handle an emergency, and who to contact in an emergency.
- Worked with young people to evaluate the success of the activity?

If staying overnight, have you checked?

- If there is 24/7 access to centre staff?
- If there are appropriate sleeping arrangements for young people, i.e. separate provision for boys and girls, and separate provision for leaders (within ear shot of young people)?
- The centre's supervision and security?

Hazard Assessment of Activities with Children

Introduction

Hazard assessment is an important part of working with children. It assists with managing both health and safety issues, and the welfare of children.

As adults we assess hazards throughout our lives, but when working with children it is important to consider potential hazards that may lead to risk to children and to the adults who work with them. Consideration of how to control or manage hazard is critical. It is important to identify acceptable levels of hazards, as all risk cannot be removed.

Whilst this guidance is concerned primarily with hazards associated with failure to follow effective safeguarding practice, it must be understood alongside the health and safety regulation and policy of the Diocese. Whilst the focus on hazard assessment should be on groups of children with whom you are working, as opposed to the physical venue, if a problem with the venue is discovered during the course of assessing (e.g. broken glass, electrical cabling, etc.) this needs to be raised with the appropriate authority in charge of health and safety for the Diocese.

What does the term ‘hazard’ mean?

A hazard is a potential source of harm or adverse health effect on a person or persons. This may include areas such as:

- Failure to comply with effective safeguarding practice, such as lack of supervision ratios or consent forms;
- Medical hazards, such as failure to take medication, or inappropriate intimate care practice;
- Physical hazards, such as dangerous electrical cabling, or proximity to water.

Assessing hazards

1. Identify the hazards: look for hazards in the nature of the activity, and in the place where you are holding the activity.
2. Identify who is at risk: decide who may be harmed and how. Everyone, or perhaps only certain people, may be at risk. Some groups may need special consideration as they may be more vulnerable to certain hazards.
3. Identify what the likelihood of harm may be.
4. Identify the consequences of injury or harm: the consequences could range from trivial to severe or even fatal. The most severe hazards need the most urgent attention.
5. Identify the controls that need to be put in place to limit the hazard.

These steps should be used to complete a hazard assessment form, (Appendix 29).

If no hazard exists, you don't need to note it on the form.

Reviews

Risk should be periodically reviewed, especially in circumstances when a venue changes, a new activity takes place or the members of the group change.

Anti-Bullying

We recognise the devastating effects and long-term damage that bullying can have on children/ young people and we hope to create safe 'bullying-free' environments for our children/young people.

What is bullying?

- Bullying is intentional, repeated and aggressive physical, verbal or psychological behaviour directed by an individual or group against others;
- Bullying can occur at any age, in any environment, and can be long or short term;
- Any child/young person can be a victim of bullying;
- Bullying can be perpetrated by adults towards children/young people, as well as children/ young people towards their peer group;
- Isolated incidents of aggressive behaviour, which should not be condoned, cannot be described as bullying. However, when the behaviour is systematic and ongoing it is bullying;
- Bullying results in pain and distress to the victim.

Bullying can be:

- **Emotional/psychological:** tormenting, excluding, extorting, intimidating, etc.
- **Physical:** pushing, kicking, hitting, punching, intimidating, damaging/stealing property, or any use of violence, etc.;
- **Racist:** racial taunts, i.e. insults about colour, nationality, social class, religious beliefs, ethnic or Traveller background, or use of graffiti or gestures;
- **Sexual:** unwanted physical harassment or contact, or sexually abusive comments. This may constitute actual sexual abuse, which should be reported;
- **Homophobic:** taunting a person of a different sexual orientation;
- **Verbal:** name-calling, sarcasm, spreading rumours, teasing, etc.;
- **Cyber:** misuse/abuse of email, mobile phones, internet chat rooms, social media, text messaging, or camera and video facilities;
- **Subtle:** such as an unwelcome expression or gesture that is repeated and focused on an individual;
- **Perpetrated by adults:** this can include adults who are not related to the child. When perpetrated by adults, rather than children, bullying behaviour could be regarded as physical or emotional abuse. However, other major forms of child abuse – such as neglect and sexual abuse – are not normally comprehended by the term 'bullying'.

Prevention

To help prevent bullying, the following strategies are suggested:

- Engage children/young people in discussions about what bullying is and why it cannot be tolerated;
- Encourage children/young people to take responsibility and report any incidents of bullying to their leader/person in charge;
- Review this bullying guidance with children/young people and parents involved in parish/ agency activities;
- Seek to promote positive attitudes of social responsibility, tolerance and understanding among all personnel.

Procedures to deal with bullying

- All incidents of bullying should be brought to the attention of the leader/person in charge;
- All incidents will be recorded on incident report forms and kept on file;
- Leaders should report to and seek guidance/support from the parish priest/priest in charge;
- Parents should be informed of any incidents of bullying, and should meet with the leader/ person in charge to discuss the problem. A record should also be kept;
- The bullying behaviour or threats of bullying must be investigated and the bullying quickly stopped;
- Both the victim and bully should be supported and helped throughout the process;
- If necessary and appropriate, the Gardaí should be consulted.

Pope John Paul II Award

The Pope John Paul II Award values and encourages the participation of young people in activities that allow them to live their faith in Jesus Christ in their parish and wider community. The award is designed to facilitate involvement in school, parish, religious and community activities.

The majority of activities carried out as part of the award fall within the scope of the safeguarding policy of the Church or school, but there are other activities that do not. Therefore, it is imperative that the protocol below is strictly adhered to, especially when the activities engaged in by the participant in the award fall outside the scope and remit of safeguarding children covered by the diocese or congregation, parish or school policies and procedures.

In addition to what is set out in the Pope John Paul II Award handbook, in particular its code of ethics, the following protocol applies to those who engage in the award:

- Parental/guardian and children's joint consent is a requirement for all those participating in the award who are under eighteen years of age, (Appendix 26a and 24);
- A completed application form must be given to the award leader prior to engagement in the award, (Appendix 26a);
- For activities associated with the award that take place within diocesan, congregational, parish or school contexts, the participant must abide by the safeguarding policy and procedures of the relevant location, including its codes of behaviour;
- Specific activities may require additional parental/guardian consent, at the discretion of either or both the Pope John Paul II Award committee/coordinator and the award leader;
- It is highly recommended that participants in the award scheme carry out their parish involvement and social awareness activities in groups of two or more;
- Where activities associated with the award fall outside the scope of the diocesan, congregational, parish or school safeguarding policy, the following procedure applies (if unsure, please contact the Pope John Paul II Award committee/coordinator to verify if diocesan, congregational, parish or school safeguarding policy applies to any particular activity):
 - I. Activities must be approved by the Pope John Paul II Award committee/coordinator. It is the responsibility of the award leader to ensure that this happens using the parish and social activities form, (Appendix 26b).
 - II. The external organisation must complete the Safeguarding Agreement Form, (Appendix 26c).
 - III. The activity cannot commence until both forms are completed and returned to the award leader.

Use of Church Property and Hire for Private Functions

Individual adults (parents/guardians/family members) approaching the parish priest/local superior to use Church property for a private function do not meet the requirement for vetting by the Church authority. All parish/congregations are insured to cover one-off private events, and it is the sole responsibility of the parents/guardians to organise and supervise all children attending. As such, they are not required to confirm in writing that they have a safeguarding policy or appropriate insurance.

However, as a matter of good practice, each parish priest/local superior should ensure that key health and safety measures are covered prior to agreeing the property for use. For example, it would be good practice to draw up an agreement with a potential user (e.g. in the case of a child's private birthday party), highlighting the terms and conditions for the use of the Church property, which should include:

- That the Diocese will ensure the property is safe to use, including how accidents resulting from the condition of the property should be reported;
- That the Diocese is not responsible for the organisation, supervision or conduct of the children or adults involved in the event;
- That the safeguarding policy of the Diocese does not apply to the private party, and, as such, all safeguards are the responsibility of the organiser of the event and not the Diocese.

What is excluded as part of this guidance?

This guidance is specifically for events that involve children, and is not designed for non-child-related events. Additionally, this guidance does not cover the following situations:

- Ministry with children that is organised by the Diocese as part of sacramental celebrations (for example a Communion/Confirmation celebration involving a number of children). In these situations, the responsibility for safeguarding rests with the Diocese;
- Use of Church property for other parish-related or community-related activities such as funeral receptions and other such activities, which fall outside the remit of safeguarding children;
- Schools using Church property for sacramental celebrations. In these situations, it is advisable that the school and the Diocese agree who is responsible for safeguarding using National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI) Guidance, ref 2.1J.

Procedures for External Groups who wish to use Church Property

The Diocese of Limerick welcomes other organisations/groups/ individuals within the community using our facilities. While using the Diocesan's facilities, we want to be assured that all reasonable steps have been taken to safeguard children, young people and vulnerable persons.

The responsibility for complying with good safeguarding practice (including safe recruitment and vetting) rests with the group using Church property and not with the Diocese of Limerick.

The Diocese of Limerick has its own policies and procedures in relation to safeguarding children. Any group operating under the name/auspice of the Diocese of Limerick will comply with these requirements.

As an outside body, the Diocese of Limerick requires detailed information in respect of your application to ensure that the safety and well-being of the children, young people and adults that work with them are maintained at all times.

Conditions of use of Church property by outside bodies:

1. It is the responsibility of any group using Church property to run activities involving children to ensure that they comply with all applicable child safeguarding and protection legislation and guidelines.
2. The group should have their own child safeguarding policy and procedures. The group is also responsible for liaising with Tusla to ensure that the policy and procedures meet the statutory requirements. The Church body cannot assist any outside group in developing a child safeguarding policy.
3. The Diocese of Limerick requires confirmation in writing from the group that they have a child safeguarding policy in place.
4. The group should have appropriate insurance for the proposed activity. Documentation to be provided will include the name of their insurers, the policy number, the period of cover of the policy, the limit of indemnity.

We would ask that you complete the application/questionnaire in Appendix 27 of this procedure.

What is excluded as part of this Guidance?

This guidance is specifically for events that involve children and vulnerable persons, and is not designed for non-child/vulnerable person's related events. Additionally, this guidance does not cover the following situations:

- Ministry with children that is organised by the Diocese as part of sacramental celebrations, for example a Communion/Confirmation celebration involving a number of children). In these situations, the responsibility for safeguarding rests with the Diocese;
- Use of Church property for other parish-related or community-related activities such as funeral receptions and other such activities, which fall outside the remit of safeguarding children;
- In situations where Schools use Church property for sacramental celebrations, it is advisable that the school and the Parish agree who is responsible for safeguarding (NBSCCCI 2.1J). Ordinarily, it will be the School who is responsible for safeguarding in these circumstances;
- This does not deal with the request for use of Church Property for private functions. Guidance on such requests can be obtained from the Diocesan Secretary.

External Organisations that offer advice and support regarding Child Safeguarding Policies

The following organisations may prove helpful in providing training and assisting external groups to create their own safeguarding policy.

- Tusla Information and Advice Officers <http://www.tusla.ie/children-first/roles-and-responsibilities/organisations/children-first-training>
- Barnardos <http://barnardos.ie/what-we-do/training-and-consultancy.html>
- National Youth Council of Ireland <http://www.nycitraining.org>

Use of Technology

Church authorities need to assess the benefits of technology and how this can be used safely and effectively, in line with rules that respect the dignity and rights of all users, particularly children.

Detailed policies and procedures should be provided on the use of technology, including digital and online systems such as:

- The internet (Procedure, page 61);
- Texting and emailing (Procedure, page 62);
- Photography (Procedure, page 64);
- CCTV and webcams (Procedure, page 66).

The majority of occasions when people use mobile phones, computers or take photographs of children do not provide any cause for concern. However, there are occasions when this is not the case.

At the outset it is important to identify the risks associated with the use of technology, and then to minimise the risks by putting in place measures outlined below.

Consent

The consent of parents/guardians and children should always be sought prior to engaging in any activity that involves the use of IT equipment, such as those outlined above.

A Diocese may seek overall consent from its members/group leaders (Appendix 24), or it may ask for permission for set occasions (Appendix 30).

When seeking consent for the use of images or videos for Church purposes, the following should be considered:

- The issue of consent for photography/videoing for Church purposes should be addressed with parents/guardians and children prior to the sacramental day, and the policy should be explained to all families who will be attending;
- In seeking consent for photography/videos, children and families should be reminded about the rights to privacy and data protection of other children, their families and the wider community;
- Those organising an event for Church purposes, and who are seeking consent for photography/video usage, should be sensitive to the fact that many parents/guardians are reluctant to allow the general viewing of their children, or of children in their care, on sites such as YouTube, Facebook, etc.

Purpose

Guidelines should be clear as to the reason and purpose of the use of the particular form of technology:

- Provide a clear brief about what is considered appropriate in terms of content and behaviour and use of equipment;
- Provide guidance on acceptable language;
- Provide guidance on storage of information;
- Provide guidance on use of photography: if using an external photographer/videographer, seek confirmation about any publications that will be made by them after the event, and ensure that they have been vetted, have identification and do not have any unsupervised access to children or one-to-one photo sessions at events;
- Images of children should never be taken that capture them in what are commonly understood as 'non-public' activities. Children should be fully and appropriately dressed and related images should always be about the activity and not focused on any individual child;
- Images should not allow the identification of a child or their whereabouts. The full name of a child should not be used;
- Children in vulnerable circumstances (e.g. those in care or victims of any type of abuse) should not be photographed without the consent of those who hold parental responsibility;
- Provide guidance on the use of mobile phones, and especially on the use of mobile phone cameras, which can be easily used for offensive actions without the subject being aware of their use;
- Provide guidance on how to communicate this policy with parents/guardians and young people.

Use of the Internet

It is recognised that the internet is valuable and widely used. Within the Church context, clear guidelines must be developed and inserted into the code of behaviour for each Church activity involving children (Appendix 21).

The following are deemed unacceptable behaviours, and must be avoided in every situation:

- Visiting internet sites that contain offensive, obscene, pornographic or illegal material;
- Using a computer to perpetrate any form of fraud or piracy;
- Using the internet or email systems to send offensive and harassing material to others;
- Using obscene or racist language in computer-assisted communications;
- Publishing defamatory or otherwise false material generated by oneself or by others through social networking;
- Introducing any form of malicious software into the used network;
- Intentionally damaging any information communication technology equipment;
- Using another user's password, or giving that password to a third party.

It is important that the following are made clear to all who use the internet:

- All Church personnel/volunteers/group leaders must be made aware of their responsibility, and sign up to appropriate use of the internet as part of a code of behaviour.
- Responsibility is about safeguarding children, taking care of oneself, one's co-workers and group leaders;
- Anyone using a shared computer requires their own individual password;
- Training in appropriate and responsible internet and computer use is imperative in order to follow best practice in all activities that concern children, co-workers and volunteers.

Use of Texting and Email

Texting and email are very quick and effective methods of communication for those involved in Church activities. Usually this does not include adult members of Church personnel contacting young people directly, as contact is usually made via their parents/guardians. However there are certain circumstances where contacting young people directly may be necessary (i.e. in an emergency or on a trip away), any members of Church personnel using this method of communication with young people should ensure appropriate safeguards are in place as there are certain risks associated with the safe and appropriate use of texting and email, which must be managed.

The risks of text and email messaging for children and young people are:

- Inappropriate access to, use of, or sharing of personal details (names, numbers, email addresses);
- Unwanted contact with children/young people from adults text bullying by peers etc.;
- Being sent offensive or otherwise inappropriate materials;
- Grooming for sexual abuse;
- Direct contact and actual abuse.

The risks for adults include:

- Misinterpretation of their communication with young people;
- Potential investigation (internal or by statutory authorities);
- Potential disciplinary action.

Using bulk (or bundled) text and email messaging

A way to minimise the risks above is to use bulk text messages. This is where the same text or email message is sent to several young people involved with a particular activity or group. The advantage of this approach is that it presents fewer opportunities for misuse and abuse than personal, one-to-one texting or emailing arrangements between staff or volunteers and children/young people. Therefore, one-to-one texting or emailing should be strongly discouraged and should only occur in exceptional circumstances. The same applies to emailing young people.

The following guidance is provided to minimise risk to all:

1. Consent must be obtained from young people and their parents/guardians prior to sending young people text or email messages. Parents/guardians should be offered the option to be copied on texts and emails that their child will be sent.
2. The young people's mobile phone numbers or email addresses should be stored safely and securely in accordance with requirements for the Recording and Storage of Information set down by the National Board in its Standards and Guidance documentation (Appendix 33) and National Board Appendix B); with access only available to the specific identified members of Church personnel. The numbers or details should not be shared with anyone else, and should only be used for the purposes of the text and email messaging system regarding the Church activity;
3. All text and email messages must be sent via a bundle to a group of young people, i.e. the same standard text message is sent to every member of the group. The text and email messaging system should never be used to send text or email messages on an individual basis (i.e. to just one person);

4. All text and email messages sent must make it clear to the young people receiving them who has sent the message;
5. Young people should not be given the opportunity to text or email back to the system. It should only be used as a one-way communication channel;
6. The text and email messages that are sent must never contain any offensive, abusive or inappropriate language;
7. When this guidance is being provided in relation to Church-related activities, all of the text or email messages sent must be directly related to Church activities. The text or email messaging system and mobile phone numbers must never be used for any other reason or in any other way;
8. All of the text and email messages sent should include a sentence at the bottom that provides young people with the opportunity to unsubscribe from receiving further text and email messages.

Use of Photography

The use of photos on websites and in other online/hard copy publications can pose direct and indirect risks to children and young people. The Church authority wishing to use images of the children they work with, or are otherwise in contact with, should consider these guidelines.

The Church only has responsibility for safeguarding and the use of photography if it plans to use the photographs for Church purposes. Photographs taken at events organised by family and schools such as Communion, weddings or Confirmations do not fall under the responsibility of the Church, unless they are being taken for Church purposes.

Risks to children

Even if the child's personal identity (full name, address) is kept confidential, other details accompanying the photo can make them identifiable and therefore vulnerable to individuals looking to groom children for abuse. There is also a risk that the photo itself will be used inappropriately by others. Photos can easily be copied and adapted, perhaps to create images of child abuse, which can then find their way on to other websites.

How to minimise risks

- Establish the type of images that appropriately represent the activity and think carefully about any images showing children and young people on the Church website or publication;
- Never supply the full name(s) of the child or children along with the image(s);
- Only use images of children in suitable dress and focused on the activity, rather than one particular child;
- Obtain permission: the permission of parents/guardians and children should always be sought when using an image of a young person. Parents/guardians should be aware of the Church's policy on using children's images and of the way these represent the Church or activity. This must be recorded on a joint consent form for use of images of children. The child's permission to use their image must also be recorded if they are under eighteen years of age. This ensures that they are aware of the way the image is to be used to represent the activity (Appendix 30).

Using photographers

The Church often employs photographers for certain sacramental or Church activities.

When using a photographer, it is important to do the following:

- Provide a clear brief about what is considered appropriate in terms of content and behaviour;
- Ascertain if the photographer requires vetting and, if they do, put them through the process;
- Provide the photographer with a form of identification that must be worn at all times;
- Do not allow unsupervised access to children or one-to-one photo sessions at events;
- Do not allow photo sessions to take place away from the event, for instance, at a young person's home;
- Inform parents/guardians and children that a photographer will be in attendance, and ensure that they consent to both the taking and publication of photos or films;
- Seek confirmation on the extent of any publications that will be made by the photographer after the event.

If parents/guardians and parishioners are intending to photograph or video at an organised event, they should also be made aware of what is permitted and what is not.

Responding to concerns

Children and parents/guardians should be informed that if they have any concerns regarding inappropriate or intrusive photography, these should be reported to the Diocese to ensure that any reported concerns are dealt with in the same way as any other child protection or child safeguarding issue.

Use of CCTV and Webcams

The increasing use of CCTV and the internet has wide implications, and unless such systems are used with proper care and consideration they can give rise to concern that the individual's 'private space' is being unreasonably invaded or eroded. Each Diocese must have an appropriate data protection policy in place that covers the use of webcam and CCTV images.

Section 2 (1) c (iii) of the Data Protection Act requires that data are 'adequate, relevant and not excessive' and fit for purpose for which they are collected.

If a data controller is satisfied that it can justify the installation of a CCTV system, it must carefully consider what it will be used for and if these uses are deemed reasonable in the circumstances.

Security of premises or other property is probably the most common use of a CCTV system and, as such, will typically be intended to capture images of intruders, or of individuals damaging property or removing goods without permission.

Using a CCTV to constantly monitor employees is highly intrusive and would need to be justified by reference to special circumstances. The retail sector is one example where there is evidence to suggest that money or goods could be removed without authorisation.

The location of CCTV is a key consideration, and its use within areas where individuals would have a reasonable expectation of privacy, e.g. toilets and changing rooms, would be difficult to justify.

Cameras placed so as to record external areas should be positioned in such a way as to prevent or minimise recording of passers-by, or of another person's private property.

Having acknowledged the positive and sometimes negative aspect of CCTV, each Diocese should draw up a policy and guidelines in order to maximise the benefit of such installations and minimise the possibility of a person's privacy being infringed.

The following should be considered:

- If CCTV cameras are in place, it is important to have very obvious signs informing Church personnel, parishioners, volunteers and the public that this is the case;
- All uses of CCTV must be appropriate and fit for a specific purpose. As CCTV infringes the privacy of persons captured in the images, there must be a genuine reason for installing such a system;
- If installing such a system, the purpose for doing so must be displayed in a prominent place and preferably behind a locked noticeboard where it will not be damaged or removed. In a Church, an obvious place would be within the porch and at all entrances;
- Images captured should be retained for a maximum of twenty-eight days (see Section 2 [1] c [iv] of the Data Protection Act). An exception for a longer duration would be where images need to be retained specifically in the context of an investigation;
- Tapes should be stored in a secure environment, along with a log of access to tapes. Access should be restricted to authorised personnel. Similar measures should be in place when using disc storage, with the creation of automatic logs of access to the images.

Web broadcasting

There are a number of data protection issues that must be met in relation to broadcasting on the internet. The policy should be reflective of these:

- Recording people via a web camera, and the subsequent displaying of such images over the internet, is regarded as the processing of personal data. It is imperative that it must be done with the consent of the individual;
- Camera shots (images) of the congregation should be wide shots, minimising the possibility of easily identifying individuals with close-up images;
- Signs should be placed at all entrances to the Church and in other prominent locations, informing those attending ceremonies or visiting the Church that web cameras are in operation;
- If the Church activity being recorded involves children (for example as altar servers, ministers of the word, choirs etc.) then their written consent and that of their parents/guardians is required.
- Service providers should be able to give regular and accurate information regarding the number of people who actually log in online to view. This information is important for future planning and assessing the value of web broadcasting;
- If connecting to the parish broadband, ensure that the broadband package has unlimited usage for uploading, or else there is a risk of incurring significant costs from the provider;
- It is imperative that live broadcasts can be terminated to stop transmission. This should be done by accessing the control panel of the system. If this is not accessible by the priest from the altar, someone should be delegated to break transmission if required.

Whistle-Blowing

All staff and volunteers within the context and agency of the Church authority must acknowledge their individual responsibility to bring matters of concern to the attention of their supervisor/ superior/manager.

This could be the parish priest, religious superior, bishop, provincial and/or relevant agency managers. Although this can be difficult to do, it is particularly important where the welfare of children may be at risk.

You may be the first to recognise that something is wrong, but you may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues, or you may fear harassment or victimisation. These feelings, however natural, **must never result in a child or young person continuing to be unnecessarily at risk**. Remember, it is often the most vulnerable children or young people who are targeted. These children need an advocate to safeguard their welfare.

Don't think, 'what if I'm wrong?' Think, 'what if I'm right!'

Reasons for whistle-blowing

- Each individual has a responsibility to raise concerns about unacceptable practice or behaviour.
- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent yourself from becoming implicated.

What stops people from whistle-blowing

- Fear of starting a chain of events that spirals out of control.
- Disrupting the work or project.
- Fear of getting it wrong.
- Fear of repercussions or damaging careers.
- Fear of not being believed.

How to raise a concern

Whistle-blowing can be about a range of concerns, not just safeguarding. It is important to:

- Voice any concerns, suspicions or uneasiness as soon as possible. The earlier a concern is expressed the sooner and easier action can be taken;
- Try to pinpoint exactly what practice is concerning and why;
- Approach your immediate superior/supervisor/manager;
- If your concern is about your immediate superior/supervisor/manager, please contact your DLP, the statutory services or the NBSCCCI;
- Make sure a satisfactory response is secured – don't let matters rest;
- Ideally, concerns should be placed in writing, outlining the background and history, giving names, dates, locations and any other relevant information;
- You are not expected to prove the truth of your complaint, but you need to demonstrate sufficient grounds for concern.

What happens next?

- You should be given information on the nature and progress of any enquiries resulting from your concern.
- Your supervisor/superior/manager has a responsibility to protect you from harassment or victimisation.
- No action will be taken against you if the concern proves to be unfounded and was raised in good faith.
- Malicious allegations will be considered a disciplinary offence.
- Follow up if the person to whom you reported has not responded within a reasonable period of time, and if that follow up is not acted upon, report the matter to the relevant statutory authorities.

Self-reporting

There may be occasions when a member of staff or a volunteer has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff and volunteers have a responsibility to discuss such a situation with their line supervisor/superior/manager so that professional and personal support can be offered to the member concerned.

Whilst reporting will remain confidential, in most instances this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Complaints Procedure of the Diocese of Limerick for Safeguarding Concerns that are not Allegations of Abuse

Introduction

A complaint is defined as a grievance and/or the raising of a concern about breaches of codes of behaviour. Allegations or suspicions of child abuse do not fall into this category of general complaints, and should always be dealt with in accordance with National Board Guidance 2.1H.

This complaints procedure is not for use by Church personnel who would use the Diocesan whistle-blowing procedure to raise their complaint.

All complaints will be taken seriously and dealt with fairly and confidentially. Efforts will be made to quickly and informally resolve complaints through discussion with the parents/guardians, children/young people, volunteers/members of staff and clergy, as appropriate.

Parents/guardians, young people/children, volunteers, members of staff and clergy will be made aware that there is a complaints procedure. A copy of the complaints form is available in Appendix 28. If a parent/guardian, young person or child is not satisfied with any aspect of the running of a particular activity, or the behaviour of any individual involved in that activity, the following steps should be taken:

First step

All complaints of this nature should be resolved using an open dialogue with the Church personnel involved. If resolution is not possible, the following step should be taken.

Second step

1. The Director of Safeguarding should be contacted by completing a complaints form (Appendix 28). The Director of Safeguarding has eight weeks to consider the complaint.
2. A letter acknowledging receipt of the complaint should be sent within seven calendar days, enclosing a copy of the complaints procedure.
3. All complaints must be thoroughly investigated.
4. The Director of Safeguarding may organise a meeting to discuss and hopefully resolve the complaint.

This communication may also take place by telephone if a meeting is not possible. They will do this within fourteen calendar days of sending the acknowledgement letter to the complainant.

5. Within seven days of the meeting or discussion, the Director of Safeguarding will write to the complainant to confirm what took place and to set out any solutions that were agreed upon.
6. If a meeting is not agreeable or possible, the Director of Safeguarding will issue a detailed written reply to the complainant, setting out their suggestions for resolving the matter within twenty- one calendar days of sending the acknowledgement letter to them.
7. If the complainant is still not satisfied at this point, they should contact the Director of Safeguarding again. At the conclusion of this step, the Director of Safeguarding may decide to take further action on the complaint. If, however, the Director of Safeguarding decides not to take further action, the process is completed.

SAFEGUARDING

**Nothing in this Policy interferes with a person's right to engage in other processes.
All complaints involving safeguarding children and vulnerable persons should be directed to:
Mr. Ger Crowley, Director of Safeguarding, Limerick Diocesan Office,
Limerick Diocesan Centre, St. Munchins, Corbally, Limerick.**

**Tel: 061 350000
Mobile: 087 3233564**

**Complaints regarding the Director of Safeguarding/Designated Liaison Person and the
Safeguarding Services should be directed to:
Fr. Tony Mullins c/o Limerick Diocesan Centre, St. Munchins, Corbally, Limerick
Tel: 061 350000**