



## **De La Salle Order**

### **Safeguarding Policy for De La Salle Pastoral Centres**

# Contents

	<b>Page</b>
<b>Section 1: Safeguarding Procedures</b>	
Safe Recruitment of staff who have contact with or access to children	3
Vetting Procedures	5
External Groups using property belonging to the Brothers	5
Dealing with Accidents/Incidents	5
Whistleblowing	6
Codes of Professional Conduct for Adults	7
Photography	8
Use of CCTV and Webcams	9
Use of the Internet	10
Social Media	11
Codes of Conduct for Children	11
Anti-bullying	12
Safe Care of Children	13
Safeguarding Concerns that are not allegations of abuse	14
Supervision of Children	15
Children with Special Needs	15
Trips away with children	15
Hazard Assessment	15
Use of Technology with Children/Texting, emails	16
<b>Section 2: Responding to Allegations</b>	
Reporting Procedures	18
How to respond to an allegation of abuse	19
Recording Procedures	20
Case Management Records	22
Steps for dealing with a complainant who is dissatisfied with the way their complaint was handled.	22
<b>Section 3: Training and Support for Keeping Children Safe</b>	
Induction Process for Brothers and Lay Staff	24
Training	25
Support and Supervision	26
Addendum	27

# Safeguarding Policy for De La Salle Pastoral Centres

## Creating and Maintaining Safe Environments

The De La Salle Brothers in the District of Ireland/Great Britain/Malta recognise the necessity of creating and maintaining safe environments for children and those who minister with them. They respect the dignity of every person at every stage of their life and to protect them from all forms of abuse and neglect.

## SECTION 1

### Safeguarding Procedures

#### Procedures:

- 1.1 Safe Recruitment of staff who have contact with or access to children
- 1.2 Vetting Procedures
- 1.3 External Groups using property belonging to the Brothers
- 1.4 Dealing with Accidents/Incidents
- 1.5 Whistleblowing
- 1.6 Codes of Professional Conduct for Adults
- 1.7 Photography
- 1.8 Use of CCTV and Webcams
- 1.9 Use of the Internet
- 1.10 Social Media
- 1.11 Codes of Conduct for Children
- 1.12 Anti-bullying
- 1.13 Safe Care of Children
- 1.14 Safeguarding Concerns that are not allegations of abuse
- 1.15 Supervision of Children/Ratios
- 1.16 Children with Special Needs
- 1.17 Trips away with children
- 1.18 Hazard Assessment
- 1.19 Use of Technology with Children

#### **1.1 SAFE RECRUITMENT PROCEDURES FOR THE APPOINTMENT OF STAFF WORKING WITH/OR WHO HAVE ACCESS TO CHILDREN**

The De La Salle Brothers recognise that safe recruiting procedures ensure the appointment of suitably qualified, skilled and vetted personnel to carry out their duties in a safe manner. Whoever is employed by the Brothers must be deemed suitable for the role that they are being asked to undertake.

Safe recruitment means that the De La Salle Brothers will ensure as far as possible that:

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

## 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.

- **Checklist:** Use the recruitment and selection *Form 1.1* to ensure that effective practices are followed
- **Application Form:** Use an Application Form, including reference requests (*Form 1.2*)
- **Interview:** The interview will include; discussing the application form; advising applicants of their responsibilities towards children; and assessing their awareness of child protection and safe care practices.
- **Interview Board:** 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.
- **Storage of Paperwork:** All paperwork associated with the application process should be kept in accordance with record storage policy (*Appendix B*). 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 De La Salle Institution. Candidates will be advised that their application and the follow-up process of recruitment will be dealt with in the strictest confidence.
- **Successful Applicant:** The successful applicant will be offered a position subject to:
  - a) Suitable verified references (*Form 1.3*)
  - b) Proof of qualifications, where applicable;
  - c) Production of satisfactory Disclosure from National Vetting Bureau.
- **Positive proof of identification.** Any one coming to work or volunteer in the Sector of Ireland, 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](http://www.fingerscan.ca)
- **Appointment:** Once appointed:
  - a) Ensure probationary periods are served,
  - b) Ensure that the successful applicants are inducted in the child safeguarding policy and procedures and that they agree to follow the policy and the procedures of the Brothers by signing an Agreement Form (*Form 1.4*)
  - c) Ensure professional support, supervision, on-going training and appraisals are offered to the successful applicant, where appropriate

## Recruitment procedures (volunteers)

The following procedures are to be used for volunteers:

- Be vetted by the National Vetting Bureau and, where appropriate, 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](http://www.fingerscan.ca)
- The volunteer is inducted in the Catholic Church's child safeguarding policy and they agree to follow the policy and the procedures of the Brothers by signing a Policy Agreement Form (*Form 1.4*)

## 1.2 VETTING PROCEDURES

The following steps apply in Southern Ireland:

- The applicant completes the Vetting Invitation Form and submits it together with proof of identity to the Manager of the Pastoral Centres who sends it to the DLP.
- Garda Vetting Bureau emails the applicant a link to complete the vetting process on-line
- The Vetting Officer/DLP for the Brothers, on receipt of the Vetting Disclosure (outcome) sends a copy to the applicant and files a copy of the Vetting Cert or outcome.

In Northern Ireland the Vetting procedure is called AccessNI which requires:

- Two sets of forms are to be completed, one for the Catholic Diocese and one for the government
- The Diocesan forms are first sent to the Diocesan Safeguarding Office and after that the government form is completed online
- An Enhanced Disclosure Certificate is sent to the applicant which is given to the Director of the Pastoral Centre which is then kept on file.

## 1.3 DE LA SALLE PROPERTY THAT IS USED TO FACILITATE GROUPS WITH CHILDREN

*Groups with children using De La Salle Property*

When De La Salle property is used by groups with children the responsibility for the children rests with the organisers.

- The adult leader organising the visit is advised that the safeguarding procedures of the Church body/school to which they belong apply during the period of the visit;
- The organiser is asked to complete *Form 1.9* for use of Church property by external groups and this is retained by the Brother Director as part of record-keeping requirements (*Appendix B*).

*De La Salle Property and Hire for Private Functions*

Individual adults (parents/guardians/family members) approaching the local Brother Director to use De La Salle property for a private function on a once off basis do not meet the requirement for vetting by the Brothers and they are not required to confirm in writing that they have a safeguarding policy.

It is, however, the sole responsibility of the parents/guardians to organise and supervise all children.

Each Brother Director should ensure that key health and safety measures are covered prior to agreeing to rent/lease the property for use. The potential user will sign an agreement form that highlights the terms and conditions for the use of the De La Salle property.

This procedure does not cover the following situations:

- Non-child-related events.
- Use of De La Salle property for community-related activities such as funeral receptions and other such activities, which fall outside the remit of safeguarding children;
- Schools using De La Salle property for sacramental celebrations.

*De La Salle chapels used for Public Liturgical Celebrations*

Where a De La Salle Community celebrates Eucharist and other Liturgical Celebrations which may be attended by members of the public, including children, the Brother Director ensures that any visiting priest shows his celebret/ letter of good standing, and a record is kept to this effect.

## 1.4 DEALING WITH ACCIDENTS/INCIDENTS

All De La Salle Brothers and their staff have a duty of care towards all children with whom they have contact in the course of their ministry and that includes being familiar with the following procedures when a child has an accident while attending a church-run activity or on De La Salle members' property:

- Reassure the child and contact the parent/guardian
- Assess the level of injury:
- If the injury is severe:
  - Contact the emergency services
  - It may be necessary for someone to accompany the child to hospital
- If the injury is not severe wait for the parents / guardians to arrive
- Complete Accident/Incident Report Form (*Form 1.11*) and store securely

Medication should not be given to a child unless authorised by the parent/guardian or unless exceptional circumstances would dictate that not to do so would be more injurious to the child

## 1.5 WHISTLE-BLOWING

The De La Salle Brothers are committed to the highest possible standards of openness and accountability.

- All De La Salle Brothers and lay staff are expected and encouraged to voice any concerns about activities involving children to the Brother Director/manager/supervisor. Although this can be difficult to do, it is particularly important where the welfare of children may be at risk.
- All have a right to raise a concern about perceived unacceptable practice or behaviour
- Whistle-blowing can be difficult and stressful. Advice and support is available in the first instance from the De La Salle Safeguarding Office
- No action will be taken against an individual who raises a concern if the concern proves to be unfounded provided the concern was raised in good faith. This is in line with the Protection for Persons reporting child abuse Act 1998.
- Malicious allegations will also be treated in line with the Protection for Persons reporting child abuse Act 1998.
- All concerns will be treated, as far as possible, in confidence and every effort will be made not to reveal the identity of the complainant, if requested. If, however, concerns require further action, the complainant may at a future date have to act as a witness and/or provide evidence

### *Reasons for Whistle-blowing*

- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent oneself from becoming implicated.

### *What stops people from whistle-blowing*

- Fear of starting a chain of events that spin 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*

It is important to:

- Voice any concerns, suspicions or uneasiness as soon as possible. The earlier a concern is expressed the easier and sooner action can be taken.

- Try to pinpoint exactly what practice is of concern and why.
- Approach the local Brother Director/supervisor/manager.
- If the concern is about an immediate Brother Director/supervisor/manager then contact either the Designated Liaison Person, the Statutory services or the NBSCCCI
- Ideally concerns should be placed in writing, outlining the background and history, giving names, dates and places and any other relevant information.
- Make sure a satisfactory response is secured – don't let matters rest;
- The Whistle-blower is not expected to prove the truth of the complaint but will need to demonstrate sufficient grounds for the concern.

#### *What happens next?*

- The Whistle-blower should be given information on the nature and progress of any enquiries.
- The supervisor/Brother Director/manager has a responsibility to protect the whistle-blower from harassment or victimisation.
- No action will be taken against the whistle-blower if the concern proves to be unfounded provided it was raised in good faith.
- Malicious allegations will be considered a disciplinary offence.
- Follow up if the person to whom concern was 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 De La Salle Brother or Lay Staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. De La Salle Brothers and Lay Staff have a responsibility to discuss such a situation with the Brother Director/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.

## **1.6 CODE OF PROFESSIONAL CONDUCT FOR ADULTS**

Every De La Salle Brother and Lay member of staff must be made aware of what is and is not acceptable behaviour when dealing with children. Adults engaging with children have a duty of care to children and must at all times conduct themselves in a professional and transparent manner. Where it becomes necessary to depart from the professional code of conduct, the reason for doing so should be recorded and steps taken to avoid reoccurrence of such a situation in the future.

### **Code of Professional Conduct**

- All De La Salle Brothers and Lay staff will:
- Treat all children with respect
- Treat all children equally
- Model appropriate behaviour to all children with whom they have contact
- Report abusive and potentially abusive behaviour to the team leader
- Foster a culture of openness, honesty and safety
- Develop a culture where children have permission and are encouraged to talk of their concerns/worries
- Provide children with information on how, and from whom, they can seek help if they have a problem
- Respect each child's boundaries and avoid unnecessary physical contact

- Help children to understand their own rights and responsibilities
- Be aware of their responsibility for the children in their care
- Work in an open environment.
- Avoid spending an unnecessary amount of time alone with a child.

#### **De La Salle personnel must never:**

- Physically assault or abuse children
- Develop sexual relationships with children
- Develop relationships with children that could be deemed exploitative or abusive
- Use language, make suggestions or offer advice that is inappropriate, offensive or abusive
- Do things for a child (of a personal nature) that they can do themselves
- Participate in or condone behaviour that is illegal, unsafe or abusive
- Act in any way that is intended to intimidate, shame, humiliate or degrade a child
- Engage in discriminatory behaviour or language in relation to race, culture, age, gender, disability, religion, sexual orientation, or political views.
- Consume alcohol, tobacco or illegal drugs while having responsibility for or in the presence of children
- Take children to their bedrooms
- Transport a child on their own in a vehicle

#### **Working Alone with Children**

There are circumstances when a Brother or Lay member of Staff may find himself / herself working alone with a child:

- Where a child requests to speak to you unexpectedly
- Where a child is removed from an activity as part of its code of behaviour and you are his/her supervisor
- Where there has been an accident – you come across a child who has injured himself/herself
- One-to-one-tuition or counselling

#### **Guidance on Working Alone with Children**

##### **1. Reactive Situations**

- Try to meet the child in an open environment in view of others – in a room with a window on to the corridor or a glass panel in the door or leave the door open
- Advise another adult that such a meeting is taking place and the reason for it
- Keep a record of all such meetings – dates, times, location, duration, reason for meeting and store this information securely
- Avoid meeting a child in a building where there are no other adults present
- Avoid inappropriate times e.g. late at night

##### **2. Planned Meetings**

- The particular meeting should have a clear rationale for it being a one-to-one meeting e.g. a music lesson
- Parents / guardians should be fully informed of the nature, purpose of the meeting and must have provided written consent
- A clear code of behaviour as outlined above applies
- Limits of confidentiality should be outlined and agreed by parents and child

#### **1.7 THE 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. Brothers and Lay Staff wishing to use images of the children they work with, or are otherwise in contact with, should follow these guidelines.



## **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 De La Salle 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;

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 De La Salle policy on using children's images and of the way these represent the De La Salle 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. This ensures that they are aware of the way the image is to be used to represent the activity (*Form 1.14*).

## **Using photographers**

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

1. 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;
2. Provide the photographer with a form of identification that must be worn at all times;
3. Do not allow unsupervised access to children or one-to-one photo sessions at events;
4. Do not allow photo sessions to take place away from the event, for instance, at a young person's home except with the explicit permission of his/her parents;
5. 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;
6. Seek confirmation on the extent of any publications that will be made by the photographer after the event.
7. If parents/guardians are intending to photograph or video at an organised event, they should also be made aware of what is permitted and what is not.

## **1.8 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.

- 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.

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:

1. 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.
2. If CCTV cameras are in place, it is important to have very obvious signs informing De La Salle Brothers, Lay Staff and the public that this is the case;
3. 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;
4. If installing such a system, the purpose for doing so must be displayed in a prominent place and preferably where it will not be damaged or removed.
5. 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;
6. 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.

1. 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 knowledge of the individual;
2. Camera shots (images) of groups should be wide shots, minimising the possibility of easily identifying individuals with close-up images;
3. Signs should be placed in prominent locations, informing people that web cameras are in operation;
4. De La Salle Brothers and Lay Staff should give written consent to their image being used for web broadcasting during the course of their regular duties. Copies of this written consent should be kept in a safe and locked place;
5. Altar servers, ministers of the word, Eucharistic ministers and others taking part in liturgies (e.g. choirs and musicians) should give their written consent. In the case of children, written consent is required from parents/guardians;
6. 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;
7. 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.

## **1.9 THE USE OF THE INTERNET**

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

### **Unacceptable internet use**

- 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.

## **1.10 SOCIAL MEDIA**

Social media is now part of everyday communication and information sharing. Messages and visual images can be seen immediately by others using the internet on desktop computers, laptops, iPads, smartphones etc. Social media sites are online web applications such as Facebook, Twitter, Google, Ask.fm, YouTube, Tumblr, and Instagram. These applications allow variations of instant messaging whether by image, video, text or longer postings such as blogs. Social media encourages a high level of user generated content and interaction. Many children are avid and competent users of these platforms. Social media messages speed up the rate at which information is shared.

If De La Salle Brothers and Lay Staff have particular concerns or fears about new media, they should consult the De La Salle Communication Officer.

When posting to a social media site the following guidelines should be observed:

1. Don't write something that you wouldn't be prepared to say to someone.
2. Assume that anybody can access that post.
3. Check the privacy settings of your social media accounts. These settings determine the extent to which the information you share is publicly accessible
4. Determine whether you are participating in a personal or official capacity and consider whether your opinions and activity are appropriate in that context.
5. Never share personal details such as home addresses and telephone numbers except with people that you know and trust, in which case it is advisable only to share such details via private messages.
6. Remember that participating in social media results in your comments being permanently available and open to being re-published by other media outlets. It should be assumed that anything published in social media will remain available indefinitely, even if it is deleted from the original site.
7. In general do not send friend requests or accept a friend request from a child. If in the course of your ministry you need to 'friend' a child seek the consent of the child's parents/guardians.
8. Be honest about your identity. In personal posts, you may identify yourself as a Brother or Lay Staff. However, please be clear that you are sharing your personal views and are not speaking as a formal representative of the Brothers.
9. Never pretend to be someone else. Tracking tools enable supposedly anonymous posts to be traced back to their authors.

## **1.11 CODE OF BEHAVIOUR FOR CHILDREN**

A Code of Behaviour should be agreed with the children. Involving children themselves in drawing up a code of behaviour will ensure greater adherence to that code.

*Content of the Code of Behaviour for Children*

The following headings should make up a Code of Behaviour for Children:

- Treat everyone with respect
- Show respect for property of oneself, other's and public property
- Not to consume alcohol, tobacco or illegal drugs
- Acting as a good role model for one's peers
- Adhering to the timetable; punctuality
- Signing in and out
- Appropriate use of mobile phones and other electronic devices
- Speaking to someone you trust if feeling uncomfortable with any situation or individual
- Not using bad language
- Not sending threatening messages
- Not bullying

The steps to be taken should the code of behaviour be breached are also discussed and appropriate sanctions agreed.

## **DEALING WITH BREACHES IN THE CODE OF BEHAVIOUR FOR CHILDREN AND ADULTS**

If the Code of Behaviour is not adhered to, efforts should be made to resolve the issue by the group leader:

- Discussion of the breach and an acceptance that a breach has occurred
- Support for the person involved
- An apology may be required in certain circumstances
- A commitment to adherence to the code henceforth
- Referral to parents in the case of a child or to the Brother Visitor in the case of an adult
- Implementation of sanctions if deemed necessary

### **Sanctions**

The following sanctions may be applied; this is not an exhaustive list:

#### ***For Children:***

- Time out of the group activity
- Exclusion from the group / activity
- Referral to parents / guardians

#### ***For Adults:***

- Retraining in Code of Professional Conduct
- Monitoring professional conduct on an on-going basis
- In serious cases, exclusion from the activity/ministry
- If necessary, formal reporting to the statutory authorities

## **1.12 ANTI-BULLYING PROCEDURE**

Bullying is the intentional, repeated aggressive physical, verbal, or psychological behaviour directed by an individual or group against others. Isolated incidents of aggressive behaviour which should not be condoned cannot be described as bullying; when the behaviour is systematic and on-going it is bullying and causes pain / distress to the victim.

### **Bullying Can Be:**

- Psychological / Emotional: Tormenting, excluding, extortion, intimidation
- Physical: Hitting, spitting, damaging property etc.
- Verbal: Name-calling, teasing, insulting
- Sexual: Unwanted physical contact, sexual abusive comments, etc.

- Racist: Insults about colour, social class, religious beliefs etc.
  - Homophobic: Taunting a person of a different sexual orientation
  - Cyber: Misuse of mobile phones, emails, social media etc.
- Some forms of bullying are quite subtle and difficult to detect e.g. unwelcome and intimidating gestures directed to a particular person.

### **Signs of Bullying:**

A person who is being bullied may show some of the following symptoms:

- Does not want to attend group/school/club anymore
- Work is deteriorating
- Poor concentration
- Has possessions which are damaged or “go missing”
- Asks for money or starts stealing money (to pay bully)
- Changes usual routine
- Is reluctant to go out
- Has torn clothes, broken glasses, missing possessions
- Becomes withdrawn, depressed, anxious, or lacking in confidence
- Starts stammering
- Becomes aggressive, disruptive or unreasonable
- Begins to bully other children or siblings
- Stops eating
- Becomes anxious when using the internet or mobile phone.

### **What to Do:**

- Bring the incident to the attention of a person who is in charge
- All incidents will be recorded on incident report forms and kept on file
- Leaders should report to and seek guidance from the Overall Team Leader
- Parents should be informed of any incidents of bullying and should meet the person in charge. A record should be kept.
- Bullying behaviour should be investigated and the bullying stopped.
- Both victim and bully should be supported
- If necessary the Gardaí may be informed.

### **Preventing Bullying**

- Discuss with children what is bullying
- Explain clearly that it will not be tolerated and why
- Encourage children to take responsibility for their own safety and the safety of others
- Ensure that children know who to report to if they are aware of bullying of self or others

## **1.13 SAFE CARE OF CHILDREN IN THE COURSE OF MINISTRY**

Brothers and their Lay Staff have a duty of care towards all children with whom they have contact in the course of their ministry.

### **Group Activity**

- A minimum of two officially appointed leaders who have been vetted should be responsible for each group of children. For mixed groups, there must be a male and female leader.
- At least one of the leaders should have completed a full-day training session provided by trainers from the NBSCCCI.

- Group leaders must be:
  - a) Fully aware of their responsibilities
  - b) Ensure adequate insurance is in place for venue, transport, personnel
  - c) Carry out safety check for hazards
  - d) Obtain signed consent forms from parents / guardians of all children attending the activity (*Form 1.12*)
  - e) Be aware of any medical conditions that attendees may have and of the appropriate response to such conditions
  - f) Plan activities that appropriate for the age and number of participants
  - g) Maintain accurate attendance sheets of all attendees
  - h) Manage the activities in a way that minimises risk

#### **1.14 PROCEDURE FOR SAFEGUARDING CONCERNS THAT ARE NOT ALLEGATIONS OF ABUSE**

- A complaint is a grievance and/or the raising of a concern about breaches of codes of behaviour.
- 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 appropriate parties.
- Parents/guardians, young people/children, volunteers, Lay Staff and Brothers will be made aware that there is a complaints procedure which includes completing a Complaints Form (*Form 1.10*)

#### **A complaint in this context is not:**

- an allegation or suspicion of child abuse
- for use by Church personnel who would use the whistle-blowing procedure to raise their complaint

#### **How to make a complaint**

##### **First Step:**

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, address the person leading the activity and engage in open dialogue.

If resolution is not possible, the following steps should be taken:

##### **Second step:**

1. The Brother Provincial or his Sector Coordinator should be contacted by completing a complaints form (*Form 1.10*) The Brother Provincial/Sector Coordinator has eight weeks to consider the complaint.
2. A letter acknowledging receipt of the complaint should be sent within seven calendar days to the originator of the complaint, enclosing a copy of the complaints procedure.
3. All complaints must be thoroughly investigated
4. The Brother Provincial may organise a meeting with a view to discuss and try to resolve the complaint. This communication may also take place by telephone if a meeting is not possible. He 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 Brother Provincial or his Sector Coordinator 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 Brother Provincial or his Sector Coordinator 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 Brother Provincial or his Sector Coordinator again.
8. At the conclusion of this step, the Brother Provincial or his Sector Coordinator may decide to take further action as a result of the complaint. If, however, the Brother Visitor /Irish delegate decides not to take further action, the process is completed.

### **1.15 SUPERVISION OF CHILDREN/RATIOS**

When planning an activity for children it is critically important to consider how many adults are needed to supervise the children, taking in to account their age, gender, the nature and duration of the activity and whether they have any special needs.

#### **Ratios**

A minimum of **two adults is required for each activity.**

In addition, the following ratios apply depending on the age and number of children involved:

- Aged 3 – 12 years = one adult to 8 children
- Aged 13 – 18 years = one adult to 10 children
- If the group is of mixed gender, there should be a male and female adult
- If there is an overnight stay there may need to be extra staff

### **1.16 PARTICIPATION OF CHILDREN WITH SPECIFIC NEEDS**

Some children have specific needs that place additional responsibility on those who care for them. Children with a disability have the same rights as any other child. If possible, environmental factors that disable a child should be adapted to the child's needs. Prohibitive attitudes should be addressed through information and education. Use the 'Participation of Children with Specific Needs Checklist', Form 1.17

### **1.17 TRIPS AWAY WITH CHILDREN**

When planning trips away with children as well as being mindful of the De La Salle's safeguarding children policy and procedures, overall planning, the venue, information to parents and children must be considered. Use the 'Trips Away with Children Checklist', Form 1.18

### **1.18 HAZARD ASSESSMENT OF ACTIVITIES WITH CHILDREN**

- Hazard assessment assists with managing both health and safety issues, and the welfare of children.
- Consideration of how to control or manage potential hazard is critical. It is important to identify acceptable levels of hazards, as all risk cannot be removed.
- Whilst this procedure is concerned primarily with hazards associated with failure to follow effective safeguarding practice, it must be understood alongside the De La Salle health and safety regulations.
- The focus on hazard assessment is 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 Brother Director

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 1.13*)  
If no hazard exists, this should be noted 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.

## **1.19 The Use of Technology with Children**

### **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. Brothers or staff engaging with children may seek overall consent from its members/group leaders (*Form 1.12*), or they may ask for permission for set occasions (*Form 1.16*).

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

1. The issue of consent for photography/videoing for De La Salle purposes should be addressed with parents/guardians and children prior to the event, and the policy should be explained to all families who will be attending;
2. 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;
3. Brothers and Lay Staff organising an event which includes children, 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.

### **TEXTING AND EMAILING CHILDREN**

Texting and email are very quick and effective methods of communication for those involved in De La Salle activities. However, there are certain risks associated with their safe and appropriate use, which must be managed.



### *Risks involved in text and email messaging*

- The risks for children and young people are:
  - a) Inappropriate access to, use of, or sharing of personal details (names, numbers, email addresses);
  - b) Unwanted contact with children/young people by adults with bad intent, text bullying by peers etc.;
  - c) Being sent offensive or otherwise inappropriate materials;
  - d) Grooming for sexual abuse;
  - e) Direct contact and actual abuse
- The risks for adults include:
  - a) Misinterpretation of their communication with young people;
  - b) Potential investigation (internal or by statutory agencies);
  - c) Potential disciplinary action.

### *Using bulk (or bundled) text and email messaging*

The following guidance is provided to minimise risk to all:

1. One-to-one texting or emailing is strongly discouraged and should only occur in exceptional circumstances. The same applies to emailing young people.
2. Bulk text messaging can be utilised i.e. the same text or email message is sent to several young people involved with a particular activity or group.
3. Consent must be obtained prior to sending young people text or email messages. For all children, specific consent must be obtained from their parents/guardians. Parents/guardians of younger children should be copied on texts and emails on one to one texts that their child will be sent.
4. The children's mobile phone numbers or email addresses should be stored in either a locked and secured cabinet, or on an electronic system that is password protected, with access only available to the staff member or volunteer identified to the children and parents/guardians as a group leader. The numbers or details should only be used for the purposes of the text and email messaging system regarding the youth activity;
5. 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 shouldn't be used to send text or email messages on an individual basis (i.e. to just one person) except in exceptional circumstances;
6. All text and email messages must make it clear to the young people receiving them who have sent the message;
7. Children 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.
8. The text and email messages that are sent must never contain any offensive, abusive or inappropriate language;
9. 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;
10. All of the text and email messages sent should include a sentence that provides young people with the opportunity to unsubscribe from receiving further text and email messages.

## SECTION 2

### Responding to Allegations

Children occupy a central place in the heart of the Christian community. The paramount consideration in all matters relating to children is their safety and protection from all forms of abuse. To create and maintain a safe environment, the De La Salle Brothers are committed to respond effectively to ensure that all allegations/concerns of abuse are reported, both within the Church and to statutory authorities. This responsibility to report is mandatory.

The De La Salle Brothers provide guidance and training on recognition of abuse, and clear procedures on what to do when a child protection concern arises, so that everyone knows how to respond appropriately. This involves knowing who to tell and how to record it. It is the responsibility of every Brother and Lay Member of Staff to ensure that children who may need help and protection are not left at risk of abuse.

#### **This section will outline:**

1. Reporting Procedures/Liaison with Statutory Authorities
2. How to respond to an allegation of abuse
3. Recording Procedures
4. Case Management Records
5. Steps for dealing with a complainant who is dissatisfied with the way their complaint was handled.

#### **1. REPORTING PROCEDURE**

Following receipt of an allegation/concern, the following steps should be taken:

- a) Act and refer the matter to the DLP without delay.
- b) If the disclosure does not relate to De La Salle Brothers, religious or clerics who are working with the Brothers, the DLP will refer the allegation to:
  - The HSCT/Tusla
  - An Garda Síochána/PSNI
- c) If the allegation relates to Lay Members of Staff who are not clerics or religious, the DLP will refer the allegation to:
  - The HSCT/Tusla
  - An Garda Síochána/PSNI
  - The Brother Provincial
- d) If the allegation relates to Brothers and/or other religious or cleric working with the Brothers, the DLP will refer the allegation to:
  - The HSCT/Tusla
  - An Garda Síochána/PSNI
  - The Brother Provincial
  - The National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI)
- e) If the allegation relates to the Brother Provincial the DLP will inform:
  - The statutory authorities
  - The NBSCCCI
  - The Superior General
  - The Superior General will temporarily remove the Brother Provincial Visitor and empower his first assistant to manage the case.

- f) In cases of emergency (and/or outside normal business hours), where a child appears to be at immediate and serious risk, contact Tusla/HSCT immediately. If Tusla/HSCT are not available, contact An Garda Síochána/PSNI to ensure that under no circumstances a child is left in a dangerous situation.
- g) If there is any uncertainty about whether the disclosure meets the threshold for reporting, the DLP will consult with statutory authorities.

## **2. RESPONDING TO ALLEGATIONS OF ABUSE**

### **a) Types of Disclosures**

An individual may informally or formally refer to:

- Abuse that happened to them when they were a child
- Something they've been told by someone else and that they strongly believe is true
- Seeing signs of abuse, such as physical injuries on a child
- Something they have witnessed

### **b) Responding to an adult making a disclosure**

Explain the referral procedures to the person

- Adopt a listening style that is compassionate, calm and reassuring. If the information upsets you, do not allow these feelings to show. If you do, you may inadvertently dissuade the person from giving any further information
- Listen carefully to that person, but do not ask intrusive or leading questions
- Stay calm, take what the person raising the concern says seriously, and reassure them
- Allow the person to continue at their own pace
- Check with the person to make sure that you have understood what they actually said. Do not suggest words – use theirs
- Make no promises, particularly in relation to confidentiality
- Do not make any comments about the respondent; do not make assumptions or speculate
- Be aware that a person's ability to recount their concern or allegation will depend on their age, culture, nationality or any disability that may affect speech or language
- Avoid statements about your reaction to the information given
- Do not question beyond checking what has been said. Do not probe for detail beyond that which has been freely given
- Do not offer wording or language to the person making the allegation

### **c) Responding to a Child making a disclosure**

- If possible have another adult with you.
- Remain calm
- Listen to the child carefully and in a manner that conveys that they are being heard and taken seriously
- Give the child the opportunity to tell their story in their own time
- Ask questions only for clarification
- Reassure the child that they have done the right thing by telling you
- Do not make promises that you cannot keep
- Explain to the child that you are going to pass the information on to the appropriate authorities and explain to them about the limits of confidentiality

#### **d) Anonymous complaints**

Anonymous complaints are to be handled carefully. Anxiety and fear may persuade some people not to immediately reveal their identity. It is sometimes difficult to act on information under these circumstances, unless at some point the name of the person raising the concern or making an allegation becomes known. If unsure whether or not the information received reaches the threshold for reporting, check with the DLP and follow the reporting procedures below.

- The person raising the concern should be informed that anonymity might restrict the ability of professionals to access information or to intervene to protect a child.
- As much openness as possible should be encouraged.
- If any identifiable information that relates to an allegation of abuse (current or past) is received, the DLP will pass this information onto the appropriate statutory authorities so that an investigation can be undertaken to assess child protection risks.
- If the allegation relates to a De La Salle Brother, after the statutory investigation has been concluded, a Church inquiry process may be required.

#### **e) Responding to an Individual who admits to abusing a child**

It is necessary to tell a person who admits an offence against a child that such information cannot be kept confidential. If such an admission is made, even where the admission relates to something that happened a long time ago, the matter must be referred to the DLP as soon as possible. The DLP will follow procedures for referral to Tusla/HSCT, and An Garda Síochána/PSNI.

#### **f) Responding to a disclosure not related to Church personnel**

Whether or not a child protection concern involves a person in the Church, it is still the responsibility of Brothers and Lay Staff to report it to the DLP, who will pass it on to the statutory authorities to ensure that children who may need help and protection are not left at risk of abuse. The safety and well-being of any child is the paramount consideration in any investigation, and children must never be put at further risk of harm by delay or inaction.

### **3. RECORDING A DISCLOSURE**

#### **a) Brothers and Lay Members of Staff recording a suspicion/concern/allegation**

1. Whenever possible and practical, take notes during the conversation. Ask permission to do this. Where it is not appropriate to take notes simultaneously, make a written record as soon as possible afterwards.
2. Use the person's own words to describe the event or incident.
3. The record will normally include:
  - The time, date, location, persons present when the suspicion/allegation is revealed
  - How the allegation/suspicion was received, e.g. by telephone, face-to-face conversation, letter, etc.
  - Identifying information of the complainant, as far as it is known: name, address and age of the complainant when the alleged abuse occurred, contact details, and address where the alleged abuse took place.
  - Details of parents/guardians where the person who has raised an allegation/concern is a child.
  - Name of the individual against whom the allegation/concern is being raised, and any other identifying information
  - Details of any action already taken about the incident/allegation

- Include all details provided by the complainant that to you may seem irrelevant. This may prove invaluable at a later stage in an investigation.
  - Sign and date the record
4. Inform the person who makes the allegation/concern that their identity and the identity of the respondent and complainant will be shared with the statutory authorities.
  5. Provide the details of the DLP and explain that the DLP will get in touch with them.
  6. The incident/concern must not be shared with anyone, apart from the statutory authorities and the DLP.
  7. Pass all original records, including rough notes to the DLP.
  8. 8. Seek written confirmation from the DLP that the information has been passed on to the statutory authorities. If the DLP does not pass the information onto the statutory authorities request a written explanation.
  9. Copies of retained records should be kept secure and confidential.

**b) In cases when a child is in immediate and serious risk and you have reported to the Statutory Authorities**

1. Make a record of the agency you have contacted. Make a note of the name and contact details of the person you have reported to, ask for a reference number for the case. Sign and date the record
2. Report the matter to the DLP and give him/her a copy of the record

**c) Reporting by the DLP**

The role of the DLP is to receive all safeguarding concerns and to pass them on to the statutory authorities. A safe environment of listening carefully and actively is created, in which a complainant feels able to disclose as much as they can remember.

- Ask if the support person can be present
- Explain your role and the referral procedures to the person
- Check if the information is correct. Do not question beyond checking what has been said. It is the responsibility of Tusla/H SCT and An Garda Síochána/PSNI to investigate. There should be no probing for detail about the alleged abuse beyond that which has been freely given
- Ask if the complainant wishes to make any additions
- Read the disclosure back to the individual and ask them to sign and date same
- Offer the services of a Support Person, if the Support Person is not present
- Report to the relevant statutory authorities, the Brother Visitor and the NBSCCCI if the allegation relates to a cleric or religious
- Notification of an allegation must be made in writing using the Child Protection Referral Form
- All fields should be completed, and if the information is not known this should be stated.
- A copy of this form must be forwarded to the statutory authority agencies and a copy retained on the case file.
- The NBSCCCI is informed of the case when it involves a cleric or religious
- Any contacts and/or meetings with statutory authority agencies should be recorded in writing and a copy kept securely in the respondent case file.
- Prior to informing the respondent that an allegation has been made, there should be a discussion with the relevant police force (An Garda Síochána/PSNI), whose view on informing the respondent should be sought. The purpose is to ensure that the Brother Provincial is not prejudicing any criminal investigation

- Prior to proceeding with the preliminary investigation in the case of clergy, or gathering the proofs in the case of a religious, written confirmation should be received from the statutory authority agencies, stating that their investigations have concluded.

#### **4. CASE MANAGEMENT RECORDS**

Case management Records will provide a complete account of involvement in order to provide evidence of all allegations and actions taken to safeguard children, to assess and manage risk and to monitor practice. All recorded information will be typed, accurate, factual and concise.

#### **5. RESPONDING TO A COMPLAINANT WHO IS DISSATISFIED WITH HOW THEIR ALLEGATION WAS HANDLED BY THE DE LA SALLE BROTHERS**

If a complainant is dissatisfied with how their allegation of abuse has been handled by the Brothers, an open and transparent system is used to deal with their stated dissatisfaction. Complaints that cannot be satisfactorily resolved by the De La Salle Brothers should be examined objectively by persons not involved with the original decisions or actions.

This process is not a re-investigation of the allegation, but a method of attempting to resolve complaints relating to how the allegation was handled by the Brothers.

This process has three distinct stages. If the complainant is dissatisfied with the outcome at the completion of a stage, then the next stage is initiated in the ongoing attempt to resolve the complaint.

##### **Stage One**

All complaints of this nature should be resolved, if possible, through an open dialogue between the Brother Provincial /delegate involved and the complainant. The Brother Provincial/delegate uses his/her best endeavours to resolve the complaint at this stage. However, if resolution is not achieved or the complainant is not happy with the outcome of discussions, then the Brother Provincial/delegate involved should advise the complainant that it is open to him/her to pursue the complaint, explaining Stage 2 of the complaints process. A written communication for and on behalf of the personnel involved, confirming the availability of Stage 2 of the process, should be sent to the complainant.

##### **Stage Two**

- a) The complainant should write to the Brother Provincial, setting out what their complaint is and how they would like it to be addressed.
- b) A letter acknowledging receipt of the complaint will be sent by the Brother Provincial to the complainant within seven working days, enclosing a copy of the this Complaints Procedure.
- c) All complaints will be thoroughly investigated by a Complaints Person appointed by the Brother Provincial - someone other than the person who dealt with the complainant's original allegation of abuse, and who is appropriately appointed by and responsible to the De La Salle Brothers
- d) This Complaints Person may organise a meeting with the complainant to discuss and hopefully resolve the complaint. The complainant may invite a person to accompany him/her to any arranged meeting. If a meeting is not possible and/or the complainant does not wish to attend a meeting, this communication with the complainant may also take place by telephone. This direct communication with the complainant should take place, if possible, within fourteen days of the letter acknowledging receipt of the complaint.
- e) Within seven days of the meeting or discussion with the complainant, the Complaints Officer will send written minutes to the complainant of what was discussed, and of any actions that were agreed upon.

- f) If the complainant is not agreeable to a meeting or discussion, or for some reason cannot participate in either, the Complaints Officer will issue a detailed written response to the complainant within twenty-one days of acknowledging receipt of the letter of complaint, setting out suggestions for resolving the matter.
- g) Whatever process is used, the Brother Provincial should ensure that no more than eight weeks is taken to consider the complaint and to propose a resolution to the complainant. If there is no resolution at Stage 2, and if the complainant wishes to proceed further, a written request for a review can be sent to the NBSCCCI by the complainant. This option of progressing to Stage 3 should be confirmed in writing by the Complaints Officer to the complainant.
- h) If there is no resolution at Stage 2, and if the complainant wishes to proceed further, a written request for a review can be sent to the NBSCCCI by the complainant. This option of progressing to Stage 3 should be confirmed in writing by the Complaints Officer to the complainant.

### Stage Three

- a) The complainant should set out in writing to the chairperson of the NBSCCCI the nature of the original complaint about how their allegation was dealt with, how they experienced Stage 1 and Stage 2 of this complaints process, and how they would now like their complaint addressed.
- a) The request to the NBSCCCI for a review should be made within three months of the conclusion of the Brother Provincial's internal complaints procedure (Stage 1 and Stage 2)
- b) The chairperson of the NBSCCCI will advise the De La Salle Brothers that the request has been made and permission sought to refer the complaint onto an independent complaints panel.
- c) Any review will be an independent evaluation of whether the proper child protection procedures have been followed, and whether the appropriate standards and best practice guidance have been adhered to.
- d) The chairperson of the NBSCCCI will refer the complaint to the chairperson of the Independent Complaints Panel, who will appoint an appropriate person or persons to conduct this Review.
- e) To assist this Review process, the De La Salle Brothers will make available to the Independent Complaints Panel all written information about how the complainant's original allegation of abuse was investigated, as well as the written records of how Stage 1 and Stage 2 of the complaints process was conducted, and of the proposals made for a resolution of the complaint.
- f) To assist this review process, the De La Salle Brothers will make available for interview all personnel involved in the handling of the original allegation.
- g) Having examined all written information concerning the complaint, the Reviewers can use discretion about the form and extent of any review or to discontinue the process, giving the reason.
- h) If, during the Review, there are concerns about the abuse of a child, the reviewers will revert to the De La Salle Brothers for their required action under Standard 2 – reporting procedures
- i) The reviewers will keep notation of all meetings and will ask all those interviewed to sign a declaration that these are an accurate record of their discussion. These notes may be shared with all involved parties, at the discretion of the reviewers.
- j) The reviewers will compile a written report on their findings and recommendations. This report will then be shared with the NBSCCCI prior to submission to all parties.

- k) With the approval of the NBSCCCI, the chairperson of the Independent Complaints Panel will submit the written report to all involved parties, with recommendations of actions to be taken within specified time frames. The sending out of this report marks the completion of Stage 3 of the complaints process.
- l) There will be no further recourse under this process if the complainant remains dissatisfied at the end of Stage 3.
- m) The De La Salle Brothers will bear all reasonable costs of the review. The chairperson of the Independent Complaints Panel and associated reviewers will be selected by the NBSCCCI in consultation with the Brothers.

## **SECTION 3**

### **Training and Support for Keeping Children Safe**

The De La Salle Brothers recognise the important role of training in identifying and responding to child abuse and welfare concerns. Taking part in Safeguarding training is one of the most effective ways to ensure that Brothers and Lay Staff are aware of safeguarding policies, procedures and their duty of care to the children. This section will outline:

1. Induction Process for Brothers and Lay Staff
2. Training
3. Support and Supervision

#### **1 Induction Process for Brothers and Lay Staff**

As soon as possible after their appointment, but not later than 4 weeks thereafter, all Brothers and Lay Staff should undertake an induction process, a core component of which must include child safeguarding.

The induction process includes the following steps:

- A representative of the Brothers meets with the newly appointed member and provides them with a copy of the Safeguarding Policy and Procedures.
- The newly appointed member is asked to carefully read the provided document and to come back to the representative of the Institute with any questions they may have within 7 working days;
- The newly appointed member is made aware that they will be required to attend a basic child safeguarding awareness training event, appropriate to their role
- The newly appointed member is made aware of how to access support regarding their role
- Following the meeting with the representative of the Brothers, having read the Safeguarding Policy and Procedures, and having any questions about it answered by the appropriate representative of the Brothers, the newly appointed member is asked to sign and date the Agreement Form to say that they have read and understand the child safeguarding policies and procedures, and that they will abide by these in their role with the De La Salle Brothers
- This signed Agreement Form is stored securely with the Sector of Ireland Coordinator



## **2 Training**

A training needs analysis will be carried out in order to provide specific and concrete information to assist the Brother Provincial or his Delegate, via the Safeguarding Committee, to make informed decisions about the particular needs and skills within the Institute. The training analysis will help the Safeguarding Committee to create a training plan for the year ahead. This plan will form part of the overall three-year child safeguarding plan.

### ***Training Needs Analysis***

The training needs analysis will:

- Identify any gaps between the current and required levels of knowledge and skills
- Identify who needs training and what training they need
- Identify gaps in training provision for particular roles or Communities
- Enhance skill levels to ensure the implementation of best practice in child safeguarding and child protection
- Assist in the evaluation of a training plan

The training needs analysis will address the following:

- What level and type of training are members currently participating in?
- What are the specific training needs of Brothers and Lay Staff?
- Who needs to be trained and what level of training is needed
- What are the key roles where training needs to be considered?
- What is the time frame within which this needs to happen?
- Which training programmes should be given priority?
- What additional/external support, if any, is needed to deliver this training?
- What training is being offered by the NBSCCCI and who would benefit from it?

### ***Collecting Data***

The Safeguarding Committee will seek advice from Community Leaders, local safeguarding representatives, safeguarding trainers, the Brother Provincial and his team, DLP, Support Person, the NBSCCCI and statutory partners. The Safeguarding Committee will:

- Go through the evaluations of all training events
- Listen to the needs of the local safeguarding representatives
- Examine the annual Community audit in order to identify the training needs of each ministry and respond appropriately.
- Following completion of this training plan and its approval by the Safeguarding Committee

### ***Training Plan and NBSCCCI***

The Safeguarding Committee will develop a Training Plan for the De La Salle Brothers in Ireland based on the training needs analysis and the strategic plan from NBSCCCI. The De La Salle Brothers will take part in the annual review of training by the NBSCCCI and forward the training needs analysis and relevant information on to the NBSCCCI

### ***Safeguarding Awareness Training***

Basic child safeguarding awareness is offered in two programmes – a one full-day training and a shorter information session.

#### ***Full-Day Training***

The training lasts for six hours and covers the following topics:

- The seven safeguarding standards
- What is safeguarding
- Recognising, responding
- How to safeguard, and the roles involved in safeguarding

### *Information sessions*

These sessions take place over a half day, and cover topics including the Reporting Procedure outlined in **Responding to Allegations** above.

### **Trainers**

The Safeguarding Committee coordinates training and its delivery. Full-day training and Information sessions are delivered by trainers who are registered with the NBSCCCI.

### **Who is the training delivered to?**

The Safeguarding Committee recommends to the Brother Provincial the level of training required for Brothers and Lay Staff, depending on their ministries. The minimum requirement is as follows:

- For each De La Salle activity that involves children, at least one leader/coordinator must attend the full-day training programme
- All Brothers who are in active ministry must attend the full-day training programme
- Any personnel with a key position of responsibility for child safeguarding must attend a full-day training programme e.g. DLP, Advisor, Support Person, Safeguarding Committee member and local Safeguarding representatives
- All other personnel must be given the opportunity to attend an information session. Regardless of the level of training required, all personnel are required to abide by good child safeguarding practice

### ***On-going training***

If there are significant updates in the area of safeguarding, the NBSCCCI trainers and/or the DLP will deliver updates to new and existing personnel. If updated training is not required, all personnel will be retrained at least every three years. The Safeguarding Committee will plan how training is delivered; this requirement can also be fulfilled by shorter refresher sessions, delivered more regularly over a three year period to cover the content of the full-day training.

## **3 Support and Supervision**

Everyone involved in dealing with child abuse requires support and/or supervision.

Support can be provided in face-to-face meetings, or by phone calls, emails, etc. It is supportive to let someone know that they are being thought about positively, being remembered in prayer, and that they can seek assistance if they need to.

A structure of appropriate support is available to all of those affected by child abuse including:

- The complainant and their family
- The respondent and their family
- Brothers who have been affected by an allegation of abuse against a confrere
- Lay faithful who have been affected by an allegation of abuse
- Safeguarding personnel

The nature of the support provided will depend on the need expressed and/or identified. It may vary from outreach, where the initiative is taken to contact and stay in touch, to the provision of information, making counselling/spiritual support available or providing and facilitating a support group. Support can also be provided through Line Management Accountability and Supervision.

### **Line management accountability**

Line management accountability is designed for individuals to work with their line manager to ensure and develop the efficacy of working situations.

Formal and informal meeting to discuss work provides the opportunity to consider individual actions, behaviours and feelings about work, together with the line manager's reactions, comments and challenges. The goal is to ensure that the recipient of the ministry provided by the Brothers is well served.

### **Supervision**

De La Salle personnel who have a designated role in safeguarding shall attend regular supervision sessions with an appropriately trained person.

1. It is envisaged that the supervision will have interrelated functions:
2. The educative function, which focusses on developing the skills, understanding and abilities of the supervisee;
3. The supportive function, which will allow the supervisee to understand the emotional impact of the work on his/her well-being;
4. The managerial function, which provides accountability and 'quality control' in work with people.
5. The Reflective function, which will help the Supervisee reflect on their own work practices and attitudes.

### **Elements of Supervision**

1. A contract or written agreement is produced, which covers:
  - Costs;
  - Frequency of supervision;
  - An agreed meeting place;
  - A shared understanding of confidentiality.
2. Periodic review:

Set milestones are agreed at the first session and include a time frame in which the supervision process will be evaluated.
3. Record-keeping

The supervisor and supervisee will maintain an agreed record of supervision, in line with guidelines on the storage and protection of data. At a minimum, a record should be kept of the dates and times that supervision was carried out.

### **Addendum:**

Forms number 1.1, 1.2, 1.3, 1.4, 1.9, 1.10, 1.11, 1.12, 1.13, 1.14, 1.16, 1.18 and Appendix B referred to in this policy document, for recording and reporting are available on the National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI) website – [www.safeguarding.ie](http://www.safeguarding.ie) - under Policy and Guidance