

SOCIETY OF THE SISTERS FAITHFUL COMPANIONS OF JESUS IN IRELAND

Safeguarding Children & Vulnerable Adults

Policies & Procedures 2013



Foreword

Inspired by Gospel values, we Faithful Companions of Jesus in Ireland strive to live with integrity, respecting the dignity and the rights of each person, particularly those of children and vulnerable adults.

The different elements of our policy and the guiding principles which underlie our Safeguarding practices are presented in this document. It enlarges upon our earlier policies and resources, includes new information and updates both policies and procedures. The contents of this publication apply to the Sisters of the Congregation of Faithful Companions of Jesus in Ireland, to their staff and volunteers. It is available in electronic format as well as in hard copy, and it includes templates of the forms required, so that these can be made more readily available to our personnel as needed.

This document is used in conjunction with statutory policies and the *Safeguarding Children:* Standards and Guidance Document for the Catholic Church in Ireland of the National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCC). The monitoring and implementation of this policy remains a high priority for FCJ Sisters in Ireland.

Our Congregation's Safeguarding Children and Vulnerable Adult Policy is based on the well-established right of all children and vulnerable adults to be respected, nurtured and protected.

Strong in companionship with Jesus and with each other we work together in the service of the Church to build the body of Christ.¹

Provincial Leader

Date:

Marganida Byron (a)

24th September 2013

¹ FCJ Constitutions



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A written policy on keeping children and vulnerable adults safe

Each child and vulnerable adult should be cherished and affirmed as a gift from God

with an inherent right to dignity of life and bodily integrity which shall be respected, nurtured and protected by all.

1.0 Introduction

- 1.1 The Sisters Faithful Companions of Jesus (FCJ) in Ireland are vowed to a celibate way of life and mutual respect among persons. The sisters view all forms of abuse, sexual, physical and emotional by its members, employees or associated personnel to be morally reprehensible. Sexual abuse is also a crime in both civil and Church law.
- **1.2** When considering sexual abuse or sexual exploitation, the FCJ Sisters maintain a primary concern for the victim's safety and well-being. Recognizing that sexual abuse or sexual exploitation has tragic consequences for those who have been abused, the FCJ Sisters adopt the following policy which is binding on all personnel and will be reviewed by the Provincial annually. This policy follows the guidelines outlined in:

Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland, 2008.

Children First: National Guidelines for the Protection and Welfare of Children, 1999.

Our Duty to Care: The Principles of Good Practice for the Protection of Children and Young People, 2002

1.3 Links to this policy are available on the FCJ website www.fcjsisters.org.



How to respond to child and vulnerable adult protection allegations and suspicions

Children and vulnerable adults have a right to be listened to and heard: Church organisations must respond effectively and ensure any allegations and suspicions of abuse are reported both within the Church and to civil authorities.

2.1 Child and Vulnerable Adult Protection Allegations and Suspicions

2.1.1 An Allegation

- a) All allegations/suspicions/concerns which suggest that a child or vulnerable adult may have been harmed should be notified to the Provincial and Designated Officer. Where there are reasonable grounds for concern, the Designated Officer will report immediately to the civil authorities, the Gardaí and HSE as required by Safeguarding Children² and the relevant statutory guidelines.³
- b) Following notification to the civil authorities, and in a manner that does not interfere with any civil investigation⁴, the Designated Officer will conduct inquiries as part of the preliminary inquiries which may include:
 - an interview with the person making the allegation (See Appendix 2). an interview with the person against whom the allegation is being made. an interview with other knowledgeable persons.
- c) The information is then presented to the Provincial, who may seek appropriate advice.
- d) All allegations of abuse of a minor or vulnerable adult will be responded to promptly. Based upon the initial inquiries the Provincial takes appropriate action:
 - The person against whom the allegation has been made will be required to take immediate leave from any assignments which involve contact with minors or vulnerable adults, if there is a semblance of truth to the allegation.

Consultation with the civil authorities should take place prior to any investigation by FCJ

² Safequarding Children: Standards and Guidance Document for the Catholic Church in Ireland, 2008

³ Children First: National Guidance for the Protection and Welfare of Children, 2011

⁴ Consultation with the civil authorities should take place prior to any investigation by FCJ



- All the requirements of civil law will be complied with.
- The complainant and the complainant's family will be attended to with compassion and assisted in obtaining counselling and support.

2.1.2 Pastoral Response to the Complainant

- a) Anyone who may have been abused or exploited is encouraged to contact either the Provincial or the Designated Officers.
- b) If an FCJ Sister or one of the FCJ employees receives an allegation from an alleged victim

(S)he will

- Stay calm
- listen respectfully
 ask for the name and contact number of the complainant
 inform the complainant that this information will be passed to the Designated
 Officer and that all allegations will be reported to the civil authorities
- As soon as possible after receiving the information, s(he) will write down everything that s(he) has been told using the words of the complainant to describe the abuse. S(he) will then sign and date this record and pass it onto the Designated Officer

S(he) will not

- Panic
- Dismiss the concern
- Probe for more information / ask other questions
- Make negative or defensive comments about the accused person
- Make assumptions or speculate
- Disclose details of the allegation to anyone else even if the allegations involve them in any way
- c) It is important that everyone in the organisation is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred. This is a task for the professional protection agencies following a referral to them of the concerns about the child or vulnerable adult.
- d) When an allegation from an alleged victim is received by the Designated Officer the complainant is invited to tell his/her story, not only to ascertain the facts, but also to establish and evaluate the complainant's needs.
- e) After appropriate consultation, the Designated Officer encourages the complainant to seek counselling with the Towards Healing counselling and support service. Other supports may be provided, including the services of a Support Person.



2.1.3 Intervention with the Respondent

- a) The Provincial, with the Designated Officer, informs the respondent of the allegation, requesting that he/she choose someone as his/her Advisor and inform the Provincial who this person is. The respondent is advised that he/she may not make contact with the person bringing the allegation or with any person connected to him or her.
- b) The Provincial may consult with the NBSCCC's Case Management Committee at any stage during the inquiry. Based upon the credibility of the allegation, the Provincial, in consultation with others, will decide whether or not to suspend the respondent from his/her present duties.
- c) Following the civil investigation, an internal process will take place, which may involve a credibility assessment and a risk assessment. All relevant information will be shared with the professionals conducting the assessments.
- d) If the respondent is to receive professional treatment, the Provincial may take the following steps, if the respondent is a sister:
 - Have her live at the convent under a supervised regime.
 - Find some appropriate work or vocational retraining for her.
 - When treatment has been completed, the Provincial, in consultation with treatment professionals and others, establishes an aftercare programme.
- e) On completion of the recommended treatment and the aftercare programme, and on receipt of a positive evaluation, the Provincial, after appropriate consultation, will consider giving this sister a permanent assignment with appropriate safeguards, which will be communicated to supervisors and colleagues.
- f) If at any time the Provincial determines that the sister cannot continue in religious life, she will seek to have the sister leave the Congregation voluntarily. If the sister does not leave voluntarily, the Provincial may initiate a canonical process for dismissal.

2.1.4 Public Statement

If it is judged to be in the interests of safeguarding children or vulnerable adults it may be appropriate for the Provincial to issue a short statement.

If the person is a lay volunteer or member of staff, s(he) may be placed on precautionary suspension and following any civil investigation internal disciplinary proceedings will apply.



2.2 Contacts

2.2.1 Designated Officers

Sr. Eileen Foley fcJ, 311 Wedgewood, Sandyford Road, Dublin 16. 086 8626753

Sr. Maria Dunne fcJ, Maryville Residence FCJ, Laurel Hill, South Circular Road, Limerick.

087 6212458

2.2.2. Services

HSE

Limerick

Area Manager, Children and Family Services HSE Building, Ballycummin, Raheen Business Park, Limerick Tel 061 482792

Dublin

Area Manager, Children and Family Services
Dublin South East Local Health Board, Vergemont Hall, Clonskeagh, Dublin 14
Tel: 01 2680300

Wexford / Waterford

Area Manager, Children and Family Services 2 St. Andrew's Terrace, Waterford Tel: 051 842969

Gardaí

Harcourt Square, Dublin 2

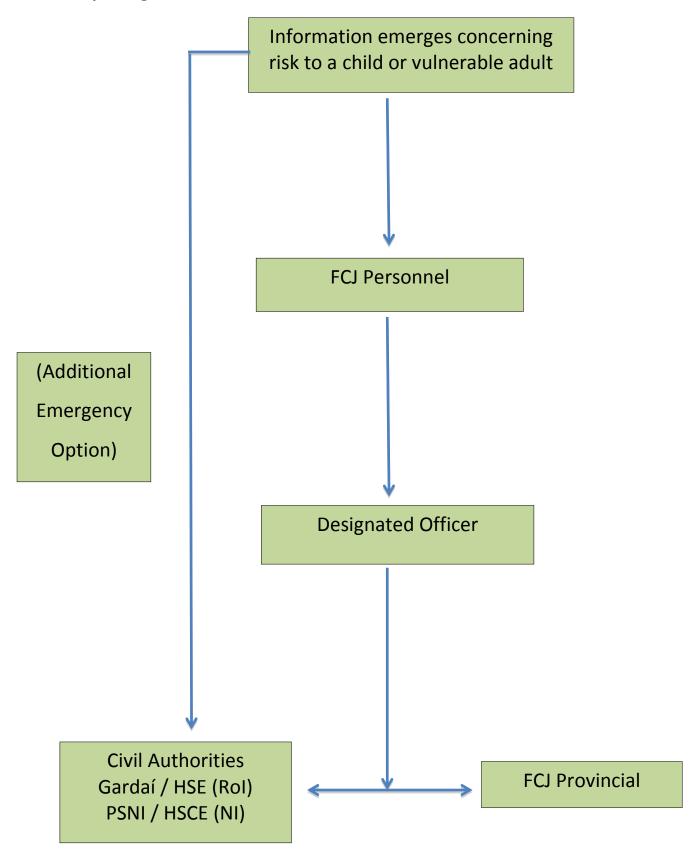
Tel: 01 666 6666

Towards Healing (Counselling and Support Service)

St. Joseph's Lodge, Mount St. Mary's, Dundrum Road, Dublin 14 Tel 1800 303416 Email info@towardshealing.ie



2.3 Reporting Procedure





Preventing harm to children and vulnerable adults

Children and vulnerable adults should have access to people they can trust, who will respect and nurture their spiritual, physical and emotional development. They also have a right to an environment free from abuse and neglect.

3.1 Safe Recruitment and Vetting Policy

3.1.1 Introduction

The purpose of this policy is to ensure that all those employed either in a contractual, pastoral or voluntary role by the FCJ Sisters are recruited safely and are suitable for whatever job/role with children or vulnerable adults they are being asked to undertake.

3.1.2 Selection and Recruitment of Employees and Volunteers

It is important that all possible steps are taken to prevent unsuitable persons gaining access to children or vulnerable adults. Those who are responsible for recruitment of employees and/or volunteers will first assess the level of contact with children and vulnerable adults and the potential risk involved in each post before recruiting employees or volunteers. In doing so they will follow the steps outlined in the Recruitment Checklist (See 3.2 below and Appendix 1).

3.1.3 Declaration Form

All those recruited as employees or volunteers will be asked to complete the Declaration Form (See Resource Form 5).

3.1.4 Questions

Establishing a fuller picture of the character and attitudes of an applicant is an important part of the safe recruitment process. During any formal interview the opportunity will be taken to assess the applicant's values, motivations, abilities, experience and suitability. (See p.68 of Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland).

3.1.5 Vetting

The Garda vetting procedures of the state should be utilised for all Sisters, employees and long term volunteers (See Resource Form 3).



3.1.6 Staff Formation

Training in best practice

All staff shall be given comprehensive training in safe and best practice in working with children, young people and vulnerable adults. This training will include, at the earliest possible stage, the provision of clear information about how to respond if concerns about child or vulnerable adult protection arise and how to create safe environments.

All staff shall be provided with the name and contact details of the relevant Designated Officer(s) and shall be made aware of the procedures for reporting suspicions or allegations of child or vulnerable adult abuse. They shall be made aware of the commitment in the Church's procedures to act in accordance with the principle that the welfare of children and vulnerable adults is always the paramount consideration.

3.1.7 Confidentiality

As with all personnel records, information obtained through the recruitment process is kept confidential.

3.2 Recruitment Checklist

- Step 1: Identify the contact the person will have with children or vulnerable adults
- Step 2: Define the Role
- Step 3: Create a job description
- Step 4: Consider selection criteria
- Step 5: Application Form or CV requested
- Step 6: Interview
- Step 7: References sought
- Step 8: Declaration form completed
- Step 9: Garda Vetting completed
- Step 10: Contract of employment
- Step 11: Induction



3.3 Code of Behaviour

3.3.1 It is important for all FCJ Sisters, employees, volunteers and others in contact with children or vulnerable adults to:

- treat all with respect
- provide an example of good conduct you wish others to follow
- operate within the Church principles and guidance and any specific procedures
- be visible to others when working with children or vulnerable adults whenever possible
- challenge and report potentially abusive behaviour
- develop a culture where children and vulnerable adults can talk about their contacts
 with staff and others openly respect each person's boundaries and help them to
 develop their own sense of their rights, as well as helping them to know what they
 can do if they feel that there is a problem
- Respect the physical and emotional integrity of children and vulnerable adults.

3.3.2 In general, it is inappropriate to:

- spend excessive time alone with children or vulnerable adults away from others
- take children or vulnerable adults to your own home, or into the convent, especially where they will be alone with you

3.3.3 Sisters, employees, volunteers and others must never:

- hit or otherwise physically assault or physically abuse children or vulnerable adults
- develop sexual relationships with children or vulnerable adults
- develop relationships with children or vulnerable adults who could in any way be deemed exploitative or abusive. This includes misusing or stealing the person's property, possessions or benefits, cheating them, using them for financial gain, putting pressure on them about wills, property, inheritance or financial transactions.
- act in ways that may be abusive or may place a child or vulnerable adult at risk of abuse



3.3.4 Sisters, employees, volunteers and others must avoid actions or behaviour that could be construed as poor practice or potentially abusive. For example, they should never:

- use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- behave physically in a manner which is inappropriate or sexually provocative
- have a child / children or vulnerable adults with whom they are working to stay overnight at their home unsupervised
- sleep in the same room or bed as a child or vulnerable adult with whom they are working
- do things for children or vulnerable adult of a personal nature that they can do for themselves
- condone, or participate in, behaviour of children or vulnerable adults which is illegal, unsafe or abusive
- act in ways intended to shame, humiliate, belittle or degrade
- discriminate against, show different treatment, or favour particular children or vulnerable adults to the exclusion of others.

3.4 Operating Safe Activities with Children

- If the pastoral care of a child or young person necessitates meeting alone with them, such meetings will not be held in an isolated environment. The times and designated locations for meetings will allow for transparency and accountability e.g. be held in rooms with a clear glass panel or window in buildings where other people are present with the door of the room left open. A record will be kept indicating that the meeting took place, including the reasons for the meeting.
- The consent of the parent / guardian of the child will be sought before any meeting takes place, except in exceptional circumstances where to do so might place the child in danger.
- When the need for a visit to the home of a child or young person arises, professional boundaries will be observed at all times.
- Babysitting for children, other than family and close friends will not take place.
- Best practice in relation to travel with children and young people will be observed.
 Personnel will not undertake any car journey alone with a child. If only one adult is
 available, there will be a minimum of two children. In the event of an emergency,
 where it is necessary to make a journey alone with a child, a record of this will be
 made and the parent / guardian of the child will be informed as soon as possible.



3.5 Students visiting Maryville – Laurel Hill

- When the Principals of either of the Laurel Hill schools request a work experience placement for a student in Maryville Residence, the Nurse Manager, or the person in charge, informs the Local Leader and the staff.
- The Nurse Manager, or the person in charge, organises and supervises the activities of the student(s).
- Students will operate only in public places.
- When any person under 18 is visiting Maryville, the Nurse Manager, or the person in charge, will be informed.
- If a member of staff receives an allegation relating to the safeguarding of a child or vulnerable adult, she will write the message down, will not request further information and refer it on to the Designated Officer.

3.6 Creation of a Safe Environment for Vulnerable Adults

- The FCJ Congregation is committed to creating environments where risk of harm is minimised and where vulnerable adults are welcomed and cared for
- Those who are involved in a ministerial role will carry out their duties with the rights of the vulnerable adults to the fore. They will recognise the potential power imbalances which may increase the vulnerabilities of the adults to whom they are ministering. It is critical that boundaries are respected, and that thoughtful relationships are established which always place the needs and well-being of the vulnerable adult as the primary concern. Those carrying out ministries will have clearly defined codes of behaviour and be accountable at all times for their actions.
- The existing structure for child safeguarding is applicable also to vulnerable adult
- Within the FCJ Congregation, the following key personnel have particular responsibility for safeguarding vulnerable adults:

Overall responsibility rests with the Provincial

Those who have responsibilities for child safeguarding will take on responsibilities for vulnerable adults in terms of ensuring the creation of safe environments and for responding to and managing allegations of abuse.

Additional skills and knowledge may be required for certain roles, e.g. within an advisory panel or safeguarding committee, or for Support People who offer support to complainants.



Training and education for keeping children and vulnerable adults safe

All Church personnel should be offered training in child and vulnerable adult protection to maintain high standards and good practice.

4.0 Training and Education

4.1 Introduction

FCJ Sisters are committed to best practice in safeguarding children and vulnerable adults. It is understood that everyone in the Church who comes into contact with children and vulnerable adults has a role to play in their protection. Training provides individuals with knowledge and skills in safeguarding children and vulnerable adults and the confidence to perform their roles. A training session also provides a forum where individuals are able to seek clarification on a range of issues.

- All personnel in FCJ establishments who come into contact with children and vulnerable adults are offered training in child safeguarding and good practice.
- At the beginning of every year all staff are reminded of the standards and safeguarding policies of the FCJ Sisters.
- The FCJ Designated Officers attend training sessions each year to maintain high standards.
- All personnel who have special responsibilities with children or vulnerable adults are provided with appropriate additional training opportunities.
- The training programme offered to staff is reviewed each year.

4.2 The following areas are covered in the training programme:

- The seven standards of NBSCCC
- Definitions of abuse
- Signs and Symptoms associated with abuse
- Disclosure of allegations
- FCJ Policies
- Reporting Procedures
- Supervision
- Available Support Structures
- Code of Conduct
- Protecting Children, Vulnerable Adults and Workers



Communicating the Church's safeguarding message

Children are welcomed, cherished and protected in a manner consistent with their central place in the life of the Church.

5.0 Communications Policy

5.1 Introduction

FCJ Residences display Safeguarding Notices in prominent places

The Notice is a statement of the child and vulnerable adult safeguarding and protection policy and contains contact details for:

- The Designated Officers
- The HSE local social work office
- The Gardaí
- Support services

This information is also displayed on the FCJ website. The website also provides access to FCJ policies in this area. This includes the procedure for reporting child protection concerns and information on support services.

- **5.2** All FCJ personnel have a working knowledge of our procedures and policies.
- **5.3** FCJ Sisters operate a policy which reflects a commitment to transparency and openness in the area of Safeguarding Children and Vulnerable Adults. FCJ Sisters are committed to sharing all information relating to child and vulnerable adult protection concerns with the statutory authorities as outlined in our policy.
- **5.4** Further information or clarification can be had by contacting one of our Designated Officers.



Access to advice and support

Those who have suffered abuse as children or vulnerable adults should receive a compassionate and just response and should be offered appropriate pastoral care to rebuild their lives. Those who have harmed others should be helped to face up to the reality of abuse, as well as being assisted in healing.

6.0 Advice and support

- **6.1** FCJ Sisters are committed to ensuring that those who have suffered abuse receive a compassionate and just response and are offered appropriate pastoral care to rebuild their lives.
- **6.2** Those who have harmed others are to be assisted to face the reality of their abusive behaviour and facilitated to seek healing.
- **6.3** Mindful of these needs the FCJ Sisters have the following measures in place:
 - Safeguarding Notices displayed in prominent locations in FCJ residencies that contain information and guidance about where and how to get advice and support.
 - The Designated Officers will provide information about where and how to get specific help and advice, whether the abused person is a child or an adult and whether the abuse is current or historical.
 - Appropriate pastoral support is offered to a complainant whether an allegation concerns current or historical abuse.
 - FCJ Sisters also strongly recommend that a perpetrator of abuse will seek appropriate remedial and therapeutic help to enable him/her confront the gravity of abuse and thus reduce the risk of reoffending.



Implementing and monitoring the Standards

To keep children safe, policies, procedures and plans have to be implemented across all Church organisations. Checks are needed to ensure this is happening consistently. The views of those involved inside and outside of Church organisations can help to improve the effectiveness of any measures taken.

7.0 Implementation and Monitoring

- **7.1** FCJ Sisters are committed to ensuring that all of our policies, procedures and codes of conduct are kept up to date.
- **7.2** To that end the following list has been compiled to facilitate implementation and monitoring of our safeguarding standards

Appropriate resources are in place for the implementation of the Safeguarding Policy.

- FCJ Sisters conduct an annual review of the implementation of its policy and procedures and updates any changes in legislation and guidance.
- A record is kept of training attended by the FCJ Designated Officers.
- Personnel working in FCJ residences are invited annually to give their views on measures contained in our policy and procedure document.
- All incidents, allegations and suspicions of abuse in FCJ residences are recorded and stored securely, in line with data safeguarding legislation.



Ways of Providing Evidence re: Implementation of Policy

The following documents will provide evidence of compliance:

Standard 1: A written policy on keeping children safe

- A copy of the policy
- Minutes of the meeting where the policy was authorised
- Written evidence of how abuse is dealt with and provision for review.

Standard 2: Procedures for responding to allegations

- Copy of written procedures
- Flow chart indicating steps in reporting process
- Name and duties of those with special responsibility for child protection
- Examples of forms for recording details

Standard 3: Preventing harm to children:

- Copy of recruitment process
- Examples of application, reference and declaration forms
- Evidence of registration with or access to agencies in any jurisdictions where we minister, who are authorised to vet people
- Guidance for adult-to-child and child-to-child behaviours
- Guidance on physical contact
- Document explaining how those with child protection concerns can confidently discuss them with senior staff
- Copy of child welfare plan re: transportation, overnights, use of IT, filming, along with evidence to show compliance with supervision ratios.



Standard 4: Training and Education

- Copy of training plan
- Record of course attendance
- Induction documentation
- Systemic on-going formation programmes for safeguarding children.

Standard 5: Communicating our Safeguarding Message

- Examples of resources used to communicate the message with reference to child protection policy and code of behaviour
- Examples of ways the policy has been promoted, including with communities and children
- Information including contact details for children when they have a concern

Standard 6: Access to Advice and Support

- Copies of information for children about sources of support
- Information about training, advice and support for all
- Copy of outreach programme for those abused and their families

Standard 7: Implementing and Monitoring Standards

- Action plan for implementing the Standards
- Record of a date planned for review and who is responsible
- Summary of the number of incidents of abuse and number of complaints



Appendix 1

Definitions

1.1 Provincial

The Provincial is the chief administrator and spiritual leader of the FCJ Sisters in Ireland.

1.2 Abuse

As defined under four headings in Children First and the Department of Education and Skills guidelines. Similarly any form of sexual exploitation of a vulnerable adult or another person shall be deemed to constitute a serious matter, whether initiated by the respondent or not:

1.2.1 Neglect

Neglect can be defined in terms of an omission, where the child or vulnerable adult suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults and medical care. The threshold of significant harm is reached when their needs are neglected to the extent that his or her wellbeing and/or development are severely affected.

1.2.2 Emotional Abuse

Emotional abuse is normally to be found in the relationship between an adult and a child or vulnerable adult rather than a specific event or pattern of events. It occurs when their need for affection, approval, consistency and security are not met. Unless other forms of abuse are present, it is rarely manifested in terms of physical signs or symptoms. The threshold of significant harm is reached when abusive interactions dominate and become typical of the relationship between the child and the parent/carer or vulnerable adult and carer.

1.2.3 Physical Abuse

Physical abuse is any form of non-accidental injury or injury which results from the wilful or neglectful failure to protect a child or vulnerable adult.

1.2.4 Sexual Abuse

Sexual abuse occurs when a child or vulnerable adult is used by another person for his or her gratification or sexual arousal or for that of others.

1.3 Allegation

A complaint or accusation made by a complainant to the Provincial, or a credible report made to the Provincial by another person because the complainant is prevented for a serious reason from speaking directly with the Provincial or Designated Officer.



1.4 Complainant / Alleged Victim

A victim shall be deemed to be any person who has experienced any of the forms of abuse defined in 1.2 above.

Respondent

A respondent is the person about whom a protection concern, suspicion, disclosure or allegation has been made.

A full glossary of definitions is available in the Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland.

Vulnerable Adult

A Vulnerable Adult is any person aged 18 years or over, who is unable to take care of him or herself or take steps to protect him or herself against significant harm or exploitation. This is because (s)he has a mental health problem, an intellectual or other disability, a sensory impairment, is old or frail, or has some form of illness.



Appendix 2

Role of the Designated Officer

2.1 Introduction

It is the Designated Officer's responsibility to receive information where it is alleged or suspected that a child (children) or vulnerable adult has (have) been or is (are) being abused by any member of the Church, including volunteers. The Designated Officer is responsible for managing the allegation / disclosure or concern, from start to finish including:

- the preliminary internal inquiry
- referral to the Health and Social Services / An Garda Síochána / PSNI
- any subsequent internal investigations.

He or she is also responsible for ensuring that the person raising the concern/suspicion or making an allegation and the respondent or alleged perpetrator are regularly informed about how the inquiry into the matter is progressing. Where an external investigation is being conducted, advice and agreement about what and how much information to share must be obtained from the Health and Social Services / An Garda Síochána / PSNI or from the NBSCCC. It is expected that the Designated Officer will seek advice from the appropriate authority if (s)he is in any doubt about interviewing a person making a complaint about abuse.

2.2 Where the person raising a concern/making an allegation or disclosure is a child, or the parent/guardian of a child, a vulnerable adult or person on behalf of a vulnerable adult who alleges abuse:

Under no circumstances should a Designated Officer interview a child or vulnerable adult alone. Designated Officers should not interview in any detail about the matter without first consulting the Health and Social Services, as the interview may more appropriately be carried out by the Health and Social Services or An Garda Síochána / PSNI.

2.3 Where an adult is making an allegation or disclosure about historical or retrospective abuse:

The individual should be asked to provide a detailed account of what happened and the circumstances. The Designated Officer should carefully record what is said, and check with the person who has raised the concern/made the allegation, about the accuracy of what has been recorded. Ample time must be given to this. A written note of the details of the matter must be prepared and these notes are to be confirmed by the signature of the person raising the concern. The Designated Officer should try to obtain sufficient information about the nature of the concern for the respondent to know what has been alleged against him or her.



2.4 Procedure

The role of the Designated Officer is to:

- **2.4.1** Receive information about a concern or allegation.
- **2.4.2** Ensure that the procedure about how to manage concerns, suspicions, allegations and disclosures of abuse involving sisters, employees and volunteers in the FCJ Safeguarding Policy and in Resource 2 of Safeguarding Children (NBSCCC) have been followed, and to ensure a referral has been made to the statutory authority where appropriate, if this has not already happened.
- **2.4.3** Create a child / vulnerable adult protection case file for every referral that includes a log of actions, events and information received using the templates provided by the NBSCCC. Entries should be made as soon as possible after the event but before the end of the day. They must be timed, dated and signed by the author.
- **2.4.4** Take possession of any written records made by any person in connection with the case and place them on the Child / Vulnerable Adult Protection Case File.
- **2.4.5** Explain the procedures for addressing the concern, allegation or disclosure to the person who has raised the concern.
- **2.4.6** To contact emergency or appropriate services where a child appears to be at immediate and serious risk of harm. An immediate referral in accordance with the Child Protection Recording Form and Resource 16 of Safeguarding Children (NBSCCC) should be made to the Health and Social Services. Where appropriate, if Health and Social Services staff are not available, An Garda Síochána / PSNI should be contacted to ensure that under no circumstances is a child left in a dangerous situation pending Health and Social Services intervention. Consideration should, in all cases, also be given to whether an immediate referral is necessary in order to preserve, and safeguard against the possibility of any loss, deterioration or destruction of potential evidence or forensic evidence.
- **2.4.7** Inform the Provincial that a complaint has been made and make a recommendation to her about any immediate action(s) that may need to be taken to ensure the safety of children. The same procedure applies to vulnerable adults.
- 2.4.8 Make enquiries to identify the present and previous appointments of the respondent in order to establish whether there are any previous concerns about his/her practice, or any current grounds for concern in relation to the safety and well-being of children / vulnerable adults. (Again, in cases of emergency, where a child / vulnerable adult appears to be at immediate or possible risk, an immediate referral in accordance with Resource 2 Procedure for Safeguarding Children (NBSCCC) 'How to manage concerns, suspicions, allegations and disclosures of abuse involving staff and volunteers' should be made to the Health and Social Services.) Where appropriate, if Health and Social Services staff are not available, An Garda Síochána / PSNI should be contacted so as to ensure that under no circumstances is a child / vulnerable adult left in a dangerous situation pending Health and Social Services intervention.
- **2.4.9** Alert the Adviser (NBSCCC) to be on standby, without identifying the respondent.



- **2.4.10** Conduct an initial interview with the respondent as soon as possible, unless (where an earlier referral has been made) the Health and Social Services / An Garda Síochána / PSNI have requested that such an interview be deferred. The respondent shall be given information about his or her entitlement to seek legal advice (both civil and, where appropriate, canonical) and about the protection process. The respondent should be informed that he/she is not obliged, in law, to respond or to furnish evidence, but that any statement provided will be taken into account in the investigation. The Designated Officer should then inform the respondent of the nature and detail of the allegation/concern and the name of the person raising it. The purpose of the interview is to inform the respondent of the existence of the allegation and of the process being followed. The respondent needs to be given enough detail about the disclosure / allegation / concern, and the person raising it, to be able to offer a response. The respondent shall be offered the services of an Adviser (NBSCCC). A written record of the interview must be prepared, agreed with the respondent, signed and dated.
- **2.4.11** Implement the referral policy as outlined in the FCJ Policy and Resource 2 Procedure 'How to manage concerns, suspicions, allegations and disclosures of abuse involving staff and volunteers'.
- **2.4.12** In cases where a Designated Officer has a concern about a child / vulnerable adult but is not sure whether to make a referral; he or she should seek appropriate advice. He or she may consult the National Office, the Health and Social Services and/or An Garda Síochána / PSNI on the appropriate steps to be taken. The Designated Officer must keep a written record of the outcome of the consultation with the Health and Social Services / An Garda Síochána / PSNI on the Case File. Decisions not to refer a matter must always be in consultation with the NBSCCC.
- **2.4.13** Ensure the availability of the Advisory Panel (NBSCCC), if required, and convene the Advisory Panel at an appropriate time.
- **2.4.14** Follow the advice given by Health and Social Services / An Garda Síochána / PSNI where a child / vulnerable adult protection concern has been referred to them. Allow the Health and Social Services / An Garda Síochána to conduct their inquiries unimpeded. The Designated Officer should not visit the family or contact family members without prior discussion with investigators.
- **2.4.15** Maintain a dialogue with the Investigating Officer or Social Worker to monitor the progress of the case and act on any advice given. Details of contacts made should be recorded chronologically on the Case File.
- **2.4.16** Ask for an update from the Health and Social Services / An Garda Síochána / PSNI about the outcome of their investigations; this request should be made in writing.
- **2.4.17** Conduct an internal investigation at the conclusion of any external investigation, or where no such investigation takes place the process should be concluded appropriately. An internal investigation will be initiated in cases where child / vulnerable adult protection concerns remain or where disciplinary action needs to be considered.

Such an investigation will gather and assess available information from all sources and witnesses. Every effort should be made, in consultation with the Health and Social Services /



An Garda Síochána / PSNI, to avoid the necessity to interview child / vulnerable adult witnesses for the purposes of disciplinary inquiries.

This investigation (which takes place after the statutory enquiries have been completed) should be conducted expeditiously, taking no longer than three months, wherever possible. In cases where there is a delay, and particularly where a sister has been temporarily removed from active ministry or a lay person suspended from duties, it is important to keep everyone informed of the progress of the investigation and to maintain records of such communications. There can be no excuse for a respondent to be left uninformed and 'in limbo' indefinitely.

Where an investigation concerns a sister, the requirements of Canon Law will also be observed.



Appendix 3

Recording Policy – Data Protection

3.1 Introduction

In February 2009, the NBSCCC issued its document Safeguarding Children: Standards and Guidance for the Catholic Church in Ireland. This guidance was endorsed and adopted by all the members of the three sponsoring bodies, namely, the Irish Episcopal Conference, the Conference of Religious of Ireland, and the Irish Missionary Union. Standards were created against which the practice of all participating parts of the Church would be assessed. Standard 2 of the NBSCCC Guidance relates to 'Procedures – How to respond to child protection allegations and suspicions.' Criterion 2.4 of Standard 2 states the following: - "There is a process for recording incidents, allegations and suspicions, and referrals. These will be stored securely, so that confidential information is protected and complies with relevant legislation." Criterion 2.6 of Standard 2 states the following: - "There is guidance on confidentiality and information sharing which makes clear that the protection of the child is the most important consideration. The FCJ Sisters undertake to meet the requirements of Standard 2 through the adoption and implementation of this Recording Policy:

3.2 Recording Policy

When an incident, allegation, suspicion or referral arises against any sister, member of staff, or volunteer, a case record will be created. It will record the information that has come to light, the actions taken, by whom and when. It will be accurate, fair, and kept up to date. The contents will be typed, where possible, to ensure legibility. The subject of the case file will be asked to agree to the creation of the file and to its content. Access to the content will be given on an agreed basis only, unless there is a clear requirement to share the information with others to prevent harm coming to a child or young person.

The case file will adhere to the structure outlined in Safeguarding Children: Standards and Guidance for the Catholic Church in Ireland. When created, the case file will be stored securely in a fireproof, locking cabinet in an agreed location. All case management safeguarding files must be retained for a period of 100 years. All other files pertaining to safeguarding should be stored for a period of 30 years.



3.3 Confidentiality

The principle of confidentiality that applies to the records created recognizes the right of subjects to have their privacy protected. Information gathered or stored on them will not be shared with others unless the following applies:-

- Permission has been given by the subject to share the information with others
- There is a clear need to share the information to protect a child or young person
- A court order or legal obligation requires disclosure
- There is an overwhelming public interest in disclosure

The National Office for Safeguarding Children has a mandate to review and monitor practice within the Church. To that end, access to case records will be given to ensure that Standards are being met and that the Recording Policy is being adhered to. When a file is created, the National Office will be notified to enable them to record the fact on a central index. The information shared will comprise the name of the subject of the file, the date on which it was created and who completed the task. All other information will be held in the case file itself.



Appendix 4

Anti-Bullying Policy

4.1. Introduction

The FCJ Congregation places a high value on equality and respect for all. We recognise the devastating effects and long-term damage that bullying can have on children, young people and vulnerable adults and we endeavour to create safe "bullying-free" environments for all in our care.

4.1.1 Defining Bullying Behaviour

Bullying is behaviour which inflicts hurt or distress by taking unfair advantage of and inappropriately exercising power over another person in some way, making that person feel uncomfortable or threatened. It is often repeated over a period of time in circumstances where it is difficult, if not impossible, for that person to defend him/herself, whatever his/her personal strength or weakness. Bullying behaviour can be both public humiliation and private torment. When two or more people of roughly the same strength (emotional, psychological and physical) have a disagreement, even if it leads to some kind of fight, their behaviour, though undesirable, should not be confused with bullying. Bullying behaviour is always an unequal relationship. Bullying behaviour includes, but is not limited to, the following:

- **Physical:** Hitting, Kicking; Pushing people around; Spitting; Taking; Damaging or hiding possessions
- **Verbal:** Name-calling; Humiliating; Offensive jokes; Excessive 'slagging'; Taunting; Teasing; Insulting; Spreading rumours; Demanding money; Cruel and unkind remarks about physical attributes or appearance; Hurtful remarks about family members.
- **Psychological:** Undermining a person's self-confidence, sense of safety, sense of sexual identity/orientation, race or gender.
- Exclusionary: Intimidating; Isolating; Excluding a person from a group; Graffiti which is not respectful of the dignity and integrity of a person.
- **Inciting others**: Promoting bullying behaviour in a group; Forcing others to collude or to stand by and do nothing.
- **Cyber bullying:** Using the internet, mobile phone messaging, social networking sites (such as Facebook, and Twitter) etc. to deliberately upset someone else.



Bullying behaviour is not limited to the above categories and includes any actions which disrespect the integrity and dignity of another human being. These behaviours may be sexist, racist, related to sexual orientation (homophobic), related to a person's home circumstances, or a person's appearance, health, disability, or any other perceived difference, rational or otherwise.

It is a common mistake to view the one who is harmed by bullying behaviour as weak, and even to see him/her as the problem. We must be clear at all times that it is the bullying behaviour which is the problem. We will never subscribe to the view that bullying is simply a fact of life and that it is impossible to solve. We must be clear that almost every bullying problem can be solved.

4.1.2 Legal Consequences

Any person who makes a physical or sexual assault on another, or who steals or causes damage to the property of another, commits a criminal offence and also a civil wrong for which there can be legal consequences. Bullying behaviour may also be regarded as threatening behaviour or harassment, which can be subject to criminal or civil proceedings.



Appendix 5

Information and Communications Technologies Policy

5.1 Inappropriate or Illegal Material

Computer and network resources shall not be used in FCJ Residences to disseminate, view, store or generate pornographic text or images or any other unauthorised materials such as abusive, obscene, threatening, defamatory, offensive or harassing images or material. Breaches will be regarded as a serious offence. Offenders shall be liable for disciplinary action, including possible termination of service and civil and / or criminal charges.

Appropriate consent is required before any media photographs / digital videotape / film is taken of children or vulnerable adults.

Photographs can only be taken by an authorised person and for legitimate reasons.



Appendix 6

'Whistleblowing' Policy

6.1 Introduction

The FCJ Sisters are committed to high standards of ethical, moral and legal conduct. In line with this commitment to open communication, this policy aims to provide an avenue for employees and volunteers to raise concerns and reassurance that they will be protected from reprisals or victimization for 'whistleblowing'.

This policy is intended to act as a procedure by which properly grounded concerns can be reported and to cover protections for you if you raise concerns regarding behaviour or activity at any FCJ residence relating to:

- incorrect financial reporting
- unlawful activity
- safeguarding and abuse of children / vulnerable adults
- activities that are not in line with FCJ policies
- activities, which otherwise amount to serious improper conduct

6.2 Safeguards

Harassment or Victimization: Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality: Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations: This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- the seriousness of the issue raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources

Bad Faith Allegations: Allegations in bad faith may result in disciplinary action.



6.3 Procedure

Process for Raising a Concern

The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting and unethical or illegal conduct or employment-related concerns should be reported to the local Superior.

Safeguarding and Child Protection: Any concerns in this area should be reported to one of the Designated Officers appointed by the Provincial. Concerns can also be reported directly to the HSE, An Garda Síochána or the National Board for Safeguarding Children in the Catholic Church. Contact details are posted on the FCJ website and on the notice boards.

Timing: The earlier a concern is expressed, the easier it is to take action.

Evidence: Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith.

6.4 How the Report of a Concern will be handled

The action taken by the FCJ Sisters in response to a report of concern under this policy will depend on the nature of the concern. The Provincial shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquiries: Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information: The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.



Resource Form 1

Recruitment Checklist

Candidate	
Role/Post	
Task	Date Completed
Identify the contact the person will have with children / vulnerable adults	
Define the Role	
Create a job description	
Consider selection criteria	
Application Form or CV requested	
Interview	
References sought	
Declaration form	
Garda Vetting	
Contract	
Induction	
Signed:	
Date:	



Resource Form 2 Application Form for Adult Volunteers Surname _____ First Name(s) _____ Address _____ Tel. ____ Email _____ Are you? (please tick) > Unemployed 🗌 Employed Student 🗌 Homemaker 🗌 Retired 🗌 Other 🗌 Previous work/volunteer experience: Have you previously been involved in voluntary work? Yes ☐ No 🗌 If yes, please give details Why do you want to get involved with this residence? Have you previously received any training for working with children, young **people or vulnerable adults?** Yes No No If yes, please give details



Any other relevant information?	
Please provide the names and address contact for a reference (not relatives).	ses of two people whom we could
Name:	
Address:	
Phone: Email:	
Name:	
Address:	
Phone: Email: _	
I declare that the above information is volunteer in this Residence. I agree to conditions of participation.	
Signed:	Date:





An	Garda Síochána	Use	Only
Re	ference No.:		

An Garda Síochána

GARDA VETTING APPLICATION FORM

NOTE TO APPLICANT

- The Enquiry Form must be completed in full using BLOCK CAPITALS (Please state N/A if details are not applicable)
 - Writing must be clear and legible
 - Return the completed form to Irish Private Home Care Association, 50 Monaleen Heights, Castletroy, Co. Limerick.

PREVIOUS NAME (if any):

➤ Do not send this form to The Garda Central Vetting Unit or to any Garda Station

To be completed by the applicant

SURNAME:

FOREN	AME:		ALIAS:				
DATE (OF BIRTH: (dd/mm/y	y)	PLACE/CITY OF ORIGIN:				
HAVE YOU EVER CHANGED YOUR NAME? Yes No							
IF YES	PLEASE STATE FOR	RMER NAME	:				
Please s	tate all addresses from	year of birth	to present da	te			_
House No.	Street	Town	County	Post Code	Country	Year From	Year To
						_	



Have you ever	been convicted of	an offence in the R	epublic of Irela	and or elsewhere?
No Y	Yes Please	e provide details		
DATE	COURT	OFFENC	E	COURT OUTCOME
				A Life same 1 / 3
Síochána to furnish against me in the R or not, pending or Signature of Appl To be completed by	who have applied to won to Irish Private Home Republic of Ireland or els completed, in the State of the Irish (Sewhere, or a statement of or elsewhere as the case of	hereb tement that there a of all convictions a may be. Date:	oy authorise An Garda ure no convictions recorded and / or prosecutions, successful
Authorised Signat		0	Irish Private Hon	ne Care Association)
Registration Num		Date:		
Registi ation ivain		Date.	M STANFOR A RESOLUTION (STORY CONTO)	
To be completed by	the Garda Central Vet	ting Unit		
According to Garda	records there are no pro	evious convictions record	ded against the abo	ove named applicant:
OR the attached co	onvictions appear on Ga	rda Records:		
OR the attached pr	rosecutions are pending:			
The conv	victions supplied may	is office based on the i apply to the subject of osed with the applican	your enquiry.	lied.
				CYLY
Signed:	- F	Member I/C		C.V.U.



Character and Personal Reference

Confidential

Dear,
Your name has been given to us by
who has applied for the position of
I would appreciate your completing and signing the information required on the next page.
Thank you in anticipation of your help.
Yours sincerely,



1) How long you have known the applicant?
2) In what capacity do you know the applicant?
3) Can you highlight some of the applicant's skills and qualities?
4) Do you, without reservation, recommend the applicant for the position for which (s)he has applied? Please bear in mind that this position involves working with children / vulnerable adults.
please tick Yes No
If NO , can you tell us why?
·
If YES, please specify why:
Any additional comments:
Signed Date
■Please Return Completed Form to:



Declaration Form for all persons working as Employees / Volunteers

Legislation in both jurisdictions in Ireland, have at their core, the principle that the welfare of children, young people and vulnerable adults must be the paramount consideration. Church organisations therefore ask that everyone working or volunteering for the Church, who will come into contact with children or personal details of children, abide by good practice by completing and signing this declaration:
Do you have any prosecutions pending or have you ever been convicted of a criminal offence or been the subject of a Caution or of a Bound Over Order (please tick)
Yes No If yes, please state below the nature and date(s) of the offence(s)
Date of offence:
Nature of offence:
Have you ever been the subject of disciplinary procedures or been asked to leave employment or voluntary activity due to inappropriate behaviour towards a child or vulnerable adult? (please tick) Yes No If yes, please give details including date(s) below:
Full name (print):
Any surname previously known by:
Address:
Date of birth: Place of birth:
DECLARATION I understand that, if it is found that I have withheld information or included any false or misleading information above, I may be removed from my post whether paid or voluntary, without notice. I understand that the information will be kept securely by the FCJ Sisters. I hereby declare the information I have provided is accurate.
Signed: Date:



Policy, Procedure and Guideline Sign-Off Sheet

Instructions for Staff and Volunteers:

Please ensure that you read these documents very carefully, ensuring that you clarify anything that you are unsure of with your line manager. Once you have read the documents and completed all enclosed forms please sign the form below to indicate that you have read and understand the contents of this file.

Thank you.

Name of Document	Read and Understood (Yes)	Signature	Date



Reporting Unacceptable Behaviour Towards Children

Once a complaint is voiced it must be brought to the attention of the nurse manager, except where the complaint is against the nurse manager herself. Then, the matter is brought to the attention of the local Superior. The approach to resolving conflict is one of open dialogue, in a safe space, in a friendly and informal atmosphere. If resolution is not possible, the matter is then brought to the attention of the Provincial. Should the issue or concern be one of safeguarding or child protection – the Designated Officer must be contacted, who will deal with the matter urgently according to our Safeguarding Policies.

General	Complaints Form
abuse complaints) should be resolved if pos	ated to Maryville Residence (with the exceptions of child sible by discussion between the parties involved. If this is plete the details below and submit it to the person in
Name	
Contact details (including address, phone	number and e-mail address)
Details of complaint	
Signature	Date
For Office Use Only	
Form received by	Date
Action to be taken, and by whom	



Child Protection Recording Form

CHILD PROTECTION RECORDING FORM

1. About the	disclosure/c	oncern				
Date of disclos	ure/concern					
Time of disclos	ure/concern					
How was infor	mation receive	d? (attach a	ny written infor	mation to th	nis form)	
Telephone	Letter	E	mail	In per	rson	
2. Details of	person makir	ng disclos	ure/raising o	concern		
Name						
Address						
Tel			Mo	bile		
Email						
Relationship to	child or allege	d victim				
3. Details of	child or alleg	ed victim				
Name						
Address						



Tel		Mobile	
Ethnic o	rigin		
Languag	ge (is interpreter/signer needed?)		
Disabilit	у		
Special :	needs		
Parish /	Order (if applicable)		
	nt / Carer details (where appropria	ate)	
Name			
Address			
Tel		Mobile	
Are they	aware of the allegation, suspicion or	complaint?	Yes No
5. Deta	ils of alleged perpetrator		
Name			
Address			The state of the s
Tel		Mobile	



Relationship to child/	victim (paren	t/priest/t	eacher etc.	.)	
Position in Church				Order	
Address at time of inc	ident(s)				
Current contact with o	children if kno	own (board	d of governo	rs of school	l, runs youth activities etc.)
Any additional inform	ation				
	_		=		es/times and location the now this referral is being
7. Action taken					
Has the matter been r	eferred to civ	il authori	ties?	Yes	No
If yes: Date				Time	
If no: Explain why					
Who was it referred to	o? Name				



Designation								
Address								
Tel			E-mail					
Has the matte	er been refe	erred to a m	ember of		n Yes		No	
If yes: Date				Time				
If no: Explain	why							
Who was it re	ferred to?	Name						
Designation								
Address								
Tel			E-1	mail				
8. Next Step	OS							
What actions authority?	were agree	d and by wh	nom whei	n the matt	er was r	eferred	onto civ	ril / Church



Are there any immediate child protection concerns? If so please record what they are and state what actions have been taken by whom to address them.					
9. Designated Officer details					
Date form sent					
10. Details of person completing	ng the form				
Name					
Tel	Mobile				
E-Mail					
Position in Church	Parish / Order				
Form completed Date Time					
Signed					

A copy must be retained by the recipient and filed in a secure location, and a copy must be sent to the Designated Officer and civil / statutory authorities