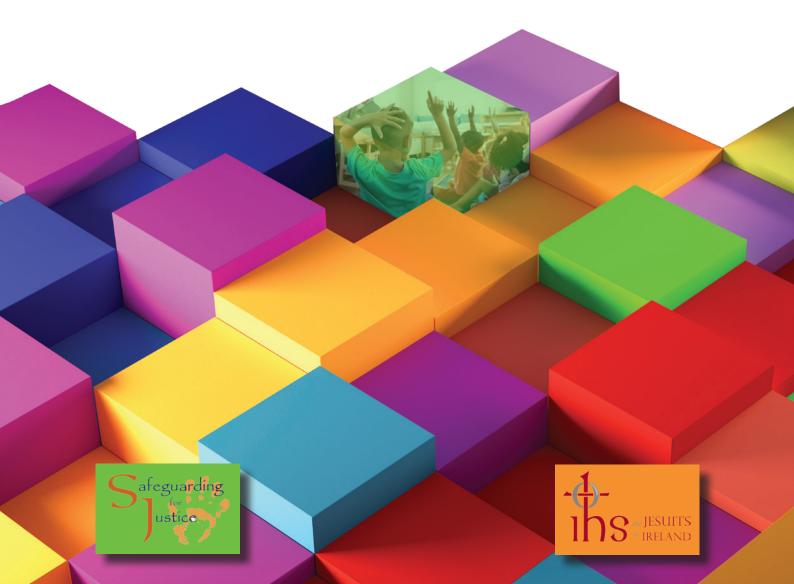
Jesuit Procedures for Safeguarding Children





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PROVINCIAL FOREWORD

I am very pleased to introduce this manual of Jesuit Child Safeguarding Procedures 2020. It is a full revision of our 2017 document and I thank the Jesuit Safeguarding Committee for their attention to the detail of this task. The National Board for Safeguarding Children in the Catholic Church in Ireland has developed comprehensive safeguarding standards. The Jesuit Irish Province has committed to implement these standards in practice and this manual of procedures details how we do this.

I commit all of those who work for and on behalf of the Jesuit Irish Province to the implementation of these procedures.

I take this opportunity to reaffirm our commitment to protecting all those to whom we minister, with particular attention to children and those most vulnerable in our society. We want the environments we create to be ones where people feel safe, cherished, and respected; where they can develop to their potential. We need to take most seriously our obligations to notice and act on concerns that emerge about children in their contexts within and outside the Church.

The year 2019 saw the promulgation of the Jesuit Universal Apostolic Preferences by Father General Arturo Sosa SJ. Of these four Preferences, two are particularly relevant to the ministry of safeguarding. One of these is "Journeying with Youth" and points us towards our accompaniment of young people in our creation of a hope-filled future. The Implementation of safeguarding procedures allows us to provide a safe place where youth can join us.

The second most relevant preference is "Walking with the Excluded". All Jesuits, all of those who work with us, and all of our works, desire to so walk with the poor and the marginalized. Specifically, though, in the context of this manual on Jesuit Child Safeguarding Procedures, it remains a source of pain that some people were abused and harmed in Jesuit and wider Church settings. Many of these people continue to feel excluded by their own Church. Our ultimate goal is to restore the relationship between that person with themselves, with the Jesuits, and with God. Father General urges us to begin with 'a conversion in our own hearts, that makes us alive and sensitive to the suffering Christ in our midst.'

I hope that this document will be a useful resource in helping us to live out our intentions to journey with youth and to walk with the excluded.

Leonard Moloney SJ

Provincial

CHAPTER 1



Guide to this Document, Safeguarding Poster & Jesuit Safeguarding Structure



GUIDE TO THIS DOCUMENT

In our work with children, the Jesuit Irish Province recognises and promotes the fundamental right of every child to a safe environment in which she or he will be free from any form of abuse, neglect or harm. We acknowledge our obligation to provide children and young people with the highest possible standard of care, in order to promote their well-being and safeguard them from abuse. The procedures contained in this document provide clear guidance on how to achieve this.

The procedures take account of:

- The Children First Act 2015
- ◆ The updated Children First: National Guidance for the Protection and Welfare of Children published in 2017
- Safeguarding Children Policy & Standards for the Catholic Church in Ireland 2016 Guidance
- UNCRC: United Nations Convention on the Rights of the Child, ratified by Ireland in 1992.

The child safeguarding policy of the Irish Catholic Church is set out in Safeguarding Children: Policy and Standards for the Catholic Church in Ireland, 2016. The Jesuits are a signatory to this Policy. Safeguarding Children contains seven safeguarding standards, as depicted in the image below.



This document describes how these seven safeguarding standards are implemented in practice across the Society of Jesus in Ireland ("Jesuits").

The procedures are to be followed by all Jesuit personnel and anyone who works with children on behalf of the Jesuits. "Jesuit personnel" is a term used throughout this document for conciseness, and it refers to Jesuits, staff and volunteers.

CHAPTER 1 contains the Safeguarding Notice, information on Jesuit ministry, Jesuit safeguarding structures and communicating safeguarding information.

CHAPTER 2 sets out good safeguarding practice and is divided into two parts. Part 1 focuses on recruiting and supervising Jesuit personnel. Part 2 focuses on activities with children.

CHAPTER 3 describes what needs to be done when we have information that a child has been, may have been or is at risk of being harmed, including information on the role of mandated persons. Part 2 of this chapter details our procedures for allegations against Jesuit personnel and the support provided to complainants.

CHAPTER 4 gives information on how we assure that the policy and procedures are being implemented.

Contained in the **APPENDICES** are forms and templates, as well as the Complaint Policy, the Protected Disclosure Policy, an Anti-Bullying Protocol, and guidance on technology when working with children.

TABLE OF JESUIT MINISTRY WITH CHILDREN AND THE POLICY WHICH APPLIES TO THAT MINISTRY

GENERIC DESCRIPTION OF MINISTRY	SPECIFIC EXAMPLES	POLICY TO BE FOLLOWED
Jesuit-run activity Note: Very little Jesuit ministry	World Youth Day pilgrimage	One-Church Safeguarding
falls within this category	Jesuit Refugee Service (refers to activities solely run by JRS)	Policy Jesuit Safeguarding Procedures
Jesuit-facilitated activity on behalf of another organisation	Jesuit Refugee Service (refers to activities delivered by JRS in Direct Provision accommodation centres) School retreat	Safeguarding Policy & Procedures of organisation within which you are working
Jesuit School Note: Jesuit schools are governed by their own Boards of Management and have their own safeguarding structures and the Jesuit Safeguarding Office does not have a remit over them.	Jesuits teaching or acting as Chaplain in a school	Department of Education and Skills policies and any local safeguarding procedures
Diocesan appointment	Parish setting	One-Church Safeguarding Policy Diocesan Safeguarding Procedures
Work for another organisation	Chaplaincy in hospital, prison or third-level education Social services NGO or Charity	Safeguarding Policy & Procedures of that organisation

Jesuits involved in work for other organisations, whether voluntary or paid, are accountable to the organisation concerned. That organisation, if providing services to children, is obliged to provide its own child safeguarding policies and procedures in accordance with Children First National Guidance (2017).

In the event that no such guidelines exist, any person involved in such work should immediately discuss the matter with their local Superior or the Safeguarding Manager/DLP and seek further guidance in relation to their position.

All Jesuit members are expected to sign a document saying that they agree to adhere to the Jesuit safeguarding policy and procedures (Appendix 1a). They also communicate their awareness of the policy and procedures of their employing organisation, where relevant. Employees and volunteers should sign a similar acceptance form (Appendix 1b).

CHILD SAFEGUARDING POLICY STATEMENT OF THE CONSTITUENT MEMBERS OF THE CATHOLIC CHURCH IN IRELAND

As a constituent member of the Catholic Church in Ireland, we recognise and uphold the dignity and rights of all children, are committed to ensuring their safety and well-being, and will work in partnership with parents/guardians to do this. We recognise each child as a gift from God, and we value and encourage the participation of children in all activities that enhance their spiritual, physical, emotional, intellectual and social development. All Church personnel (including clergy, religious, staff and volunteers) have a responsibility to safeguard children through promoting their welfare, health and development in a safe and caring environment that supports their best interests and prevents abuse.

Details of Personnel to Contact if you are Concerned about the Welfare and Safety of Children

DLP: Saoirse Fox safeguarding@jesuit.ie 01-4987333

086-3441707

Fr Declan Murray SJ socius@jesuit.ie 01-4987333

POLICE: An Garda Siochana

Dedicated Freephone for the reporting of child sexual abuse: 1800 555 222

PSNI Public Protection Unit 028 90650222

CHILD PROTECTION SERVICE:

www.tusla.ie/services/child-protection-welfare/contact-a-social-worker

HSCT GATEWAY (N. Ireland):

Belfast 028 90565444 Southern Trust (for Portadown) 0800 7837745

This safeguarding statement is displayed in a prominent location at all Jesuits property



ROLES IN THE SAFEGUARDING STRUCTURE

The Provincial is responsible for all safeguarding practices by:

- Ensuring that the appropriate child safeguarding structures and personnel are in place and providing adequate resources for same
- Liaising with the Superior General, the Holy See, and other Church bodies, as appropriate
- Ensuring compliance with canon and civil law.

Manager of Safeguarding & Designated Liaison Person (DLP)

The Manager of Safeguarding coordinates all safeguarding practices by:

- Liaising with and supporting Jesuit apostolates and communities to ensure implementation of local policies and procedures
- Liaising with the safeguarding committee and the advisory panel
- Reporting directly to the Provincial on all child safeguarding issues

As DLP he/she:

- Hearing child safeguarding concerns
- Referring child safeguarding concerns to the statutory authorities
- Managing cases and all associated documents, including ensuring that internal inquiries are conducting and supporting complainants.

The Jesuit Advisory Panel offers independent, expert advice to the Provincial on all aspects of case management of alleged or confirmed child abuse by Jesuits or Jesuit personnel. It is composed of clerical and lay persons with a range of expertise in the relevant areas. In 2018, its remit was extended to adults who may be vulnerable or at risk.

The Jesuit Safeguarding committee advises the Provincial on the creation and maintenance of safe environments for children. Its particular focus is to ensure that these Procedures are implemented across Jesuit ministries and Apostolates. It coordinates local safeguarding representatives (LSRs) and activities related to child safeguarding, e.g. training. The Manager of Safeguarding works very closely with the Committee.

In 2018, its remit was extended to vulnerable adults.

Local Safeguarding Representative (LSR) Network

Each Jesuit Community and Work is required to nominate a safeguarding rep. These reps come together twice a year coordinated by the Safeguarding Manager. The LSR is responsible for the promotion of best practice and compliance with safeguarding policy and procedures in their area.

Support person

- Keeps the complainant informed of the process of the case
- Helps direct the complainant to counselling and support
- Makes a record of any meetings or contact they have with the complainant, and reports to the DLP as appropriate.

Advisor

- Keeps the respondent informed of the process of the case
- Helps direct the respondent to counselling and support
- Makes a record of any meetings or contact they have with the respondent, and reports to the DLP as appropriate.

Mandated Person

The Children First Act 2015 has placed legal obligations on a number of professions listed as "mandated persons". Clergy, Religious and people employed as pastoral care workers are listed in the Act as "mandated persons". There is a full description of the role of mandated person at Chapter 3.



COMMUNICATING THE SAFEGUARDING MESSAGE

Having a child safeguarding policy and procedure document is a requirement, but in order for the document to be effective, it must be communicated to the relevant people in an appropriate way.

Each Jesuit place of ministry is required to display a Safeguarding Notice. This is a statement of the child safeguarding policy and it contains contact details for the Jesuit Designated Liaison Persons, and the Police and Child Protection Services.

The Safeguarding Policy and Procedures, and our Child Safeguarding Statement are published on www.jesuit.ie, alongside information on the Jesuit Safeguarding Office.

Safeguarding training and information sessions communicate important information and ensure that it is understood. In 2018, the local safeguarding representative (LSR) network was established. Each Jesuit community and apostolate nominated a person to act as the LSR. This person becomes a key player in communicating safeguarding information and assessing if additional materials and modes of communication are required for a specific target group.



CHAPTER 2



The Creation and Maintenance of Safe Environments for Children



PART 1: SAFE PERSONNEL

RECRUITMENT & SELECTION

Safe recruitment and selection procedures help to:

- 1. Identify those most suitable to fill a position
- 2. Screen out anyone unsuitable to work with children and vulnerable persons
- 3. Provide a deterrent to applying in the first place

The following procedures apply to new applicants for religious life, as well as lay people seeking to be employed or volunteer.

Safe recruitment procedures involve:

Recruitment checklist	Appendix 2
Application form	Appendix 3
An interview, with the inclusion of questions of a child protection nature where candidates will be working with children.	
Declaration form: Candidate declares that there is no reason why they should be considered unsuitable to working with children.	Appendix 4
Positive identification check in compliance with requirements of National Vetting Bureau Act	Appendix 5: Suitable I.D. and points assigned
Garda Vetting: See guidance below	Sample forms are not reproduced in this document as the form is completed online.
References: At least two verified references, one from the most recent employer	
NOTE: Please remember that Garda Vetting disclosures and other information received through a recruitment process is personal sensitive data. It should be gathered and stored in a manner that is compliant with data protection law.	

Garda Vetting and Police Checks

In the Republic of Ireland, the National Vetting Bureau Act (2012-2016) provides a statutory basis for the vetting of persons carrying out work with children and vulnerable adults. It is a criminal offence to allow anyone to engage in ministry with children or vulnerable persons, without first having them vetted. In Northern Ireland, Jesuit personnel working with children apply for Access NI vetting.

The National Vetting Bureau (An Garda Síochána) issues vetting disclosures to organisations employing people who work in a full-time, part-time, voluntary or student placement basis with children and/or vulnerable persons. The National Vetting Bureau does not decide on the suitability of any person to work with children and vulnerable persons. Rather, in response to a written request for vetting, the National Vetting Bureau releases criminal history and other specified information on the person to be vetted to the prospective recruiting organisation.

If a Jesuit becomes involved with any group working with children or young people or in the setting up of any such group, they should in the first instance contact the Jesuit Safeguarding Manager for guidance, to ensure that appropriate police vetting procedures are fully adhered to.

Although Garda/police vetting is crucial, it is only one of a range of recruitment procedures. The remainder of the recruitment tasks in the table above will allow the recruiter to systematically consider what is to be known about the applicant. The recruiter must be alert to times when an applicant was out of Ireland for a sustained period of time e.g. a year or more. Police checks may be required from other countries.

After Appointment

- Induction: Ensure that the member of Jesuit personnel is inducted into the Jesuit safeguarding policy, that they know who the Designated Liaison Person is, and that they agree to follow the policy and procedures by signing an employee acceptance form (Appendix 1b).
- Ensure the probationary period is served, where applicable.
- Ensure professional support, supervision and appraisals are offered as appropriate.
- Ensure, where the person will be working with children, that safeguarding training is provided and attended. All other personnel should be offered the opportunity to attend an awareness-raising workshop.

WORKING WITH CHILDREN: SUPERVISION, SUPPORT & TRAINING

Where Jesuit personnel work with children, it is important that they are supported in their role, provided with training, and are clear about what is expected of them.

Supervision and support

In ministries and work involving children, there should be a mix of informal and formal support mechanisms in place for personnel. The type of supports will depend on the nature and intensity of work.

Line management accountability refers to informal and formal support and oversight of work practices.

It may involve:

- An arrangement to discuss your work regularly with a manager, formally and informally
- Team dialogue and meetings
- Observation and assessment of work practices and relationships
- Regularly affording personnel the opportunity to raise questions, problems, or suggestions for change
- Assessing the need for change in policies, practice or training
- Putting in place a formal (professional/clinical) supervision structure (see below)

Formal Supervision

Formal supervision is often called work supervision, professional supervision or clinical supervision. It refers to formal, planned, one-to-one sessions between a worker and a delegated 'supervisor'. The supervisor may be the person's manager or it may be a person contracted to provide this professional service. The primary purpose of supervision is to provide an opportunity for workers to reflect on and develop their practice.



SAFEGUARDING TRAINING

- Training is a central part of the safeguarding structure, whether it be formal training workshops or communicating important information to Jesuit personnel in information sessions.
- All Jesuits attend either a safeguarding information session or full-day training, depending on their ministry and retirement status.
- Mandated persons attend a workshop specific to this role.
- Staff and volunteers working with children on behalf of the Jesuits are fully inducted and trained in child safeguarding.
- The Tusla E-Module is utilised to provide personnel with training, where it may be some time before face-to-face training is organized, or as a session which fits in a broader program of church specific safeguarding training.

Table: Church safeguarding training requirements

Nature of training	Who should attend?	
1 day safeguarding workshop	All members in active ministry Staff and volunteers who work with children	
3 hour refresher session	Every 2 years for those who previously had to attend a 1 day workshop	
Tusla e-module	To complement 1 day training program or refresher training; Can be used as an annual update	
Safeguarding information session	Retired members Invitation to all staff and volunteers	
Role specific training	Safeguarding personnel eg. DLP, support person, committee members	
Specialist training eg. Safe recruitment, running activities with young people, working with perpetrators of abuse	Any member, staff or volunteer who considers the training to be relevant to their role and responsibilities	



CODE OF BEHAVIOUR FOR ADULTS WORKING WITH CHILDREN

- ✓ Treat all children with respect and dignity
- ✓ Treat all children equally
- ✓ Model positive, appropriate behaviour to all children we come into contact with
- ✓ Challenge and report abusive and potentially abusive behaviour
- ✓ Develop a culture of openness, honesty and safety
- ✓ Develop a culture where children have permission to tell and to talk about any concerns or worries that they may have
- ✓ Respect each child's boundaries and support them to develop their own understanding and sense of their rights
- ✓ Work in open environments
- ✓ Help children to know what they can do if they have a problem

Adults must never:

- Hit or otherwise physically assault or abuse children
- Develop sexual relationships with children
- Develop relationships with children that could in any way 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
- Act in any way that is intended to intimidate, shame, humiliate, belittle or degrade
- Engage in discriminatory behaviour or language in relation to race, culture, age, gender, disability, religion, sexual orientation or political views

Adults should avoid, in so far as is possible to be alone and unsupervised with children. Where in emergencies this is unavoidable, the reasons for actions should be carefully recorded.



Breaches of the Code of Behaviour

If a member of Jesuit personnel has a concern about the practice of a colleague which may constitute a breach of the "Code of Behaviour", this should be reported to the DLP or line manager following the "Protected Disclosure Policy" (Appendix 11). This would be the case, for example, if the concern related to poor practice rather than abusive behaviour. Abusive behaviour would be reported using the procedure for responding to allegations of abuse. A concerned person, who is not Jesuit personnel, may make a complaint about an alleged breach of the Code of Behaviour using the complaint procedure (Appendix 12)

Behaviours by a worker/volunteer that may cause concern include when a worker:

- Is secretive and evasive about their activities and time spent with children and young people.
- Creates opportunities to spend significant amounts of time away from other workers/ volunteers and with a single child or children/young people on a regular basis, e.g. invites child or young person to their home.
- Seeks out vulnerable children and young people.
- Sidesteps one-to-one supervision and management of work.
- Has an unusual amount of physical contact with a child or children.
- Touches a child or children in an inappropriate way.
- Talks to a child or children in an inappropriate way.
- Excludes a particular child or children from activities.
- Disciplines a child or children inappropriately or punishes a child or children harshly.
- Handles children/young people roughly.
- Teases, taunts, insults or makes derogatory remarks about or to a child/young person.
- Restrains a child/young person as a way of punishment.
- Sexually harasses or uses sexual innuendo.
- Humiliates and/or embarrasses children/young people.
- Deprives children/young people of their basic rights.
- Inappropriately uses social media.
- Bullies children/young people.



PART 2: SAFE ACTIVITIES

ORGANISING AND RUNNING ACTIVITIES SAFELY FOR CHILDREN

INTRODUCTION

If Jesuits are to create a safe environment in which children can participate and develop well, activities need to be planned, they should be child centred in their practice and behaviour, and there should be clear procedures to guide practice.

A planning process will be entered into:

Where will the work or ministry take place, considering risks and safety?

Who will work with the children? (Safe recruitment and personnel)

How will the activity happen, in a way that keeps children safe and promotes their wellbeing?

Important Note: The majority of ministries involving children undertaken by members of the Jesuits are under the auspices of another organisation eg. Department of Education/school, Diocese. Where a Jesuit works with children for another organisation, it is expected that he is well acquainted with and adheres to that organisation's safeguarding policy and procedures.

Organising safe activities for children will involve:

- Completing a hazard assessment: This assists with managing both health and safety issues, and the general welfare of children. Guidance for completing a hazard assessment
- Register of attendance
- Supervision ratios
- Seeking 'Child & Guardian Consent' as appropriate (Appendix 8)
- Devising a Code of Behaviour for the Group
- Having an Anti-Bullying Policy (Appendix 14)
- Having clear guidance on children with specific needs
- Having a clear procedure for taking children on trips away and pilgrimage
- Guidance on accidents
- Guidance on the use of technology, photographs and videos (appendix 15)
- Guidance on external groups with children using Jesuit property

HAZARD ASSESSMENT

When running activities with children, we have a responsibility to do what we can to make sure people do not get hurt. Completing a hazard assessment can help with this. A risk assessment of Jesuit ministry is completed each time the Child Safeguarding Statement is reviewed. A hazard assessment should still be completed for specific activities.

It is important to consider potential hazards that may lead to risk to children and to the adults who work with them. Consideration of how to control or manage hazard is critical. It is important to identify acceptable levels of hazards, as all risk cannot be removed.

Completing a hazard assessment

You need to think through each element of your activity/equipment/venue. Think about what could go wrong, and what you are going to do to avoid this. Then write down your decisions, and the reasons you have made them. Make sure you include things that you have already planned to do (e.g. if you are already planning to use soft mats in front of the bouncy castle, you should still include this in the risk assessment).

A risk assessment for an event or activity needs to include:

The venue where it will be held;

The **equipment** that will be used;

The **people** who will be attending. Do they have any particular needs that might make them more likely to hurt themselves? Do you need to make sure children are supervised? Is there anyone attending that could hurt anyone else?

Assessing hazards

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

These steps should be used to complete a hazard assessment form (Appendix 6)

Review

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

SUPERVISION RATIOS

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

The table below is a guide:

0 – 2 yrs	2 – 3 yrs	3 – 7 yrs	8 yrs & over
2 staff for 3-6 children	2 staff for up to 10 children	2 staff for up to 16 children (higher ratio if outdoor activities)	2 staff for up to 20 children, with more staff if outdoors

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

Consent

Best practice states that we should seek written consent from parents and from the child or participate confirming that they wish to participate in the activity. Consent form template is at Appendix 7.

Attendance register

A minimum of two officially appointed leaders should be responsible for each activity involving young people. At least one of the leaders must have undergone a full day training session provided by trainers registered with the NBSCCCI. These leaders must sign an attendance sheet and put their initials under each date to confirm that the children/young people and adults marked were in attendance, as indicated by the 'time in' and 'time out' for each date.



DEVELOPING A CODE OF BEHAVIOUR FOR CHILDREN

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

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

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

- Treating everyone with respect
- Treating property with respect
- Not consuming alcohol, tobacco or illegal drugs
- Acting as a good role model
- Attending activities on time
- Signing in and out
- Turning off your mobile phone
- Telling someone you trust if you feel uncomfortable with any situation or individual
- Never bullying anyone or sending threatening messages.

Discipline and sanctions when dealing with challenging behaviour

As far as possible,

- Disciplining of children should be in the form of positive reinforcement.
- Rules about discipline and sanctions should be agreed as part of the code of behaviour and accepted by all workers and children as a condition of becoming involved.
- The anti-bullying protocol should be communicated to all personnel and implemented by everyone.

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

Sometimes, children can be disruptive and their behaviour can be challenging, and be risky for themselves and others. Personnel need to be trained and prepared for coping with disruptive behaviour. It is recommended that:

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

GUIDANCE ON CHILDREN WITH SPECIFIC NEEDS

Some children have specific needs that place additional responsibilities on those who care for and work with them. It is often the situational and environmental factors that disable the child, rather than the physical or intellectual difficulty the child experiences. Where possible, the environmental factors should be adapted to the child's needs. Prohibitive attitudes need to be addressed through education and information. Children who have a disability have the same rights as any other child, in line with the UN Convention on the Rights of the Child.

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

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

Generally, Church personnel are not expected to be involved in the provision of intimate care of children. This should be undertaken by suitably qualified people. It should be agreed in advance who will carry out intimate care and how it should be done. Guidelines to be borne in mind when providing intimate care include: the sensitive nature of such tasks; the need to treat every child with dignity and respect; the need to ensure an appropriate degree of privacy; the need to involve the child as much as possible in their own care; and trying to ensure consistency in who provides care.

TAKING CHILDREN ON TRIPS AWAY AND PILGRIMAGE

These activities require the following attention:

- Selection of suitable leaders and increased supervision to day activities
- Safe methods of transport
- Adequate insurance, to cover all aspects of the trip
- Written parental consent (for each individual trip)
- Obtaining from parents and guardians any information which may be relevant to a child staying away from home overnight (information concerning allergies, medical problems, or special needs)
- Involvement of young people in planning the trip and creating a behaviour contract
- Hazard assessment and management plan
- First aid
- Appropriate and well-supervised sleeping arrangements
- Respect for the privacy of children and young people in dormitories, changing rooms showers and toilets.

GUIDANCE ON ACCIDENTS

If a child has an accident and injures himself/herself while attending a Jesuit-run event, these procedures should be followed:

- 1. Assess the injury and reassure the child. If the injury is severe or the child has lost consciousness, please contact the emergency services immediately by phoning 999 or 112. If the emergency services are to be called, contact with the child's parents/guardians must be made urgently. If the parents/guardians are not available, it may be necessary for a leader to travel with the child to the hospital.
- **2.** If the injury is minor, local application of treatment should be available from the first aid box. Under no circumstances should any medication be given to a child.
- **3.** As soon as possible after the accident, write up a report using an accident/incident report form (appendix 8). Once completed, this form should be stored in a safe place, in line with data protection, and treated as a confidential document.
- **4.** Always inform parents/guardians of any accident that has occurred involving their child, regardless of how minor you consider it to be. It is good practice to give a copy of the accident/incident report form to parents/guardians.

GUIDANCE ON EXTERNAL GROUPS WORKING WITH CHILDREN THAT USE JESUITS PROPERTY

In circumstances where groups working with children are using or hiring Jesuit property for this purpose, it is necessary to check that they have a child safeguarding policy and that they are insured. There is no requirement for the Jesuits to oversee the activities or to check that their safeguarding policy is adequate. It is the responsibility of the group using the property to check with Tusla/HSCT that their policy meets statutory requirements.

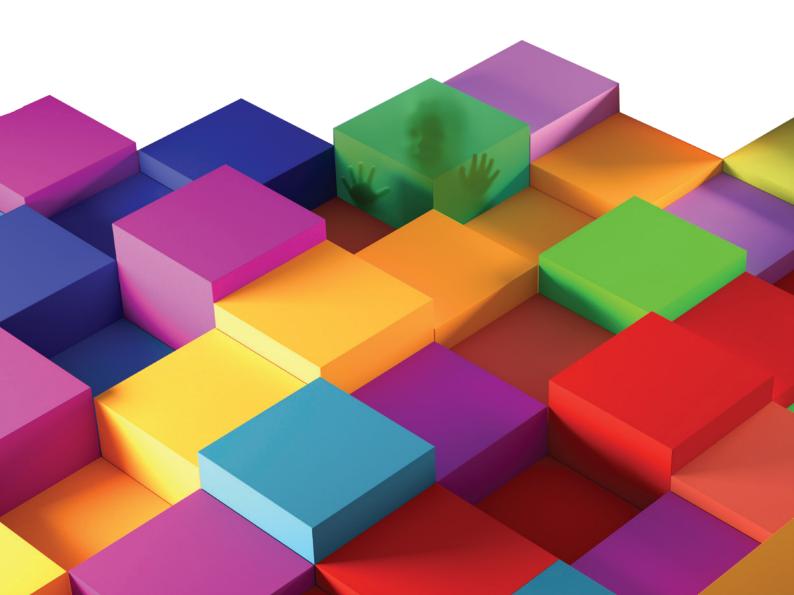
The Jesuits should have confirmation in writing that the group has a child safeguarding policy and details of their insurance policy. A template for receiving this information is set out at Appendix 10.

CHAPTER 3



Recognising and Responding to Child Protection Concerns

Note: The following procedures cover the Irish Province across the Republic of Ireland and Northern Ireland. Where legislation or statutory guidance is specific to one jurisdiction, this will be stated.



PART 1: RECOGNISING AND REPORTING CHILD PROTECTION CONCERNS

CATEGORIES AND INDICATORS OF CHILD ABUSE

Information taken from "Children First: National Guidance for the Protection and Welfare of Children" (Department of Children and Youth Affairs, 2017)

A Child

A child is a person under the age of 18.

Reasonable grounds for concern

Tusla/HSCT should always be informed when a person has reasonable grounds for concern that a child may have been, is being, or is at risk of being abused or neglected (Children First 2017). Children are sometimes abused by members of their own family, by peers or by others outside the family environment such as strangers, workers or trusted adults.

Reasonable grounds for concern are listed as:

- Evidence, for example an injury or behaviour, that is consistent with abuse and is unlikely to have been caused in any other way
- Any concern about possible sexual abuse
- Consistent signs that a child is suffering from emotional or physical neglect
- A child saying or indicating by other means that he or she has been abused
- Admission or indication by an adult or a child of an alleged abuse they committed
- An account from a person who saw a child being abused.

Neglect

Neglect occurs when a child does not receive adequate care or supervision to the extent that the child is harmed physically or developmentally. It is generally defined in terms of an omission of care, where a child's health, development or welfare is impaired by being deprived of food, clothing, warmth, hygiene, medical care, intellectual stimulation or supervision and safety. Emotional neglect may also lead to the child having attachment difficulties.

A reasonable concern for the child's welfare would exist when neglect becomes typical of the relationship between the child and the parent or carer. This may become apparent where you see the child over a period of time, or the effects of neglect may be obvious based on having seen the child once.

The following are features of child neglect:

- Children being left alone without adequate care and supervision
- Malnourishment, lacking food, unsuitable food or erratic feeding



- Non-organic failure to thrive, i.e. a child not gaining weight due not only to malnutrition but also emotional deprivation
- Failure to provide adequate care for the child's medical and developmental needs, including intellectual stimulation
- Inadequate living conditions unhygienic conditions, environmental issues, including lack of adequate heating and furniture
- Lack of adequate clothing
- Inattention to basic hygiene
- Lack of protection and exposure to danger, including moral danger, or lack of supervision appropriate to the child's age
- Persistent failure to attend school
- Abandonment or desertion

Emotional abuse

Emotional abuse is the systematic emotional or psychological ill-treatment of a child as part of the overall relationship between a caregiver and a child. Once-off and occasional difficulties between a parent/carer and child are not considered emotional abuse. Abuse occurs when a child's basic need for attention, affection, approval, consistency and security are not met, due to incapacity or indifference from their parent or caregiver. Emotional abuse can also occur when adults responsible for taking care of children are unaware of and unable (for a range of reasons) to meet their children's emotional and developmental needs. Emotional abuse is not easy to recognise because the effects are not easily seen. A reasonable concern for the child's welfare would exist when the behaviour becomes typical of the relationship between the child and the parent or carer.

Emotional abuse may be seen in some of the following ways:

- Rejection
- Lack of comfort and love
- Lack of attachment
- Lack of proper stimulation (e.g. fun and play)
- Lack of continuity of care (e.g. frequent moves, particularly unplanned)
- Continuous lack of praise and encouragement
- Persistent criticism, sarcasm, hostility or blaming of the child
- Bullying
- Conditional parenting in which care or affection of a child depends on his or her behaviours or actions
- Extreme overprotectiveness
- Inappropriate non-physical punishment (e.g. locking child in bedroom)
- Ongoing family conflicts and family violence
- Seriously inappropriate expectations of a child relative to his/her age and stage of development

Physical abuse

Physical abuse is when someone deliberately hurts a child physically or puts them at risk of being physically hurt. It may occur as a single incident or as a pattern of incidents. A reasonable concern exists where the child's health and/ or development is, may be, or has been damaged as a result of suspected physical abuse.

Physical abuse can include the following:

- Physical punishment
- Beating, slapping, hitting or kicking
- Pushing, shaking or throwing
- Pinching, biting, choking or hair-pulling
- Use of excessive force in handling
- Deliberate poisoning
- Suffocation
- Fabricated/induced illness
- Female genital mutilation

Sexual abuse

Sexual abuse occurs when a child is used by another person for his or her gratification or arousal, or for that of others. It includes the child being involved in sexual acts (masturbation, fondling, oral or penetrative sex) or exposing the child to sexual activity directly or through pornography.

Examples of child sexual abuse include the following:

- Any sexual act intentionally performed in the presence of a child
- An invitation to sexual touching or intentional touching or molesting of a child's body whether by a person or object for the purpose of sexual arousal or gratification
- Masturbation in the presence of a child or the involvement of a child in an act of masturbation
- Sexual intercourse with a child, whether oral, vaginal or anal
- Sexual exploitation of a child, which includes:
 - Inviting, inducing or coercing a child to engage in prostitution or the production of child pornography
 - ◆ Inviting, coercing or inducing a child to participate in, or to observe, any sexual, indecent or obscene act
 - ◆ Showing sexually explicit material to children, which is often a feature of the 'grooming' process by perpetrators of abuse
- Exposing a child to inappropriate or abusive material through information and communication technology
- Consensual sexual activity involving an adult and an underage person



Definition of Exploitation (Northern Ireland)

This definition is taken from "Co-operating to Safeguard Children and Young People in Northern Ireland, 2016" (Department of Health, Social Services and Public Safety)

Exploitation is the intentional ill-treatment, manipulation or abuse of power and control over a child or young person; to take selfish or unfair advantage of a child or young person or situation, for personal gain. It may manifest itself in many forms such as child labour, slavery, servitude, engagement in criminal activity, begging, benefit or other financial fraud or child trafficking. It extends to the recruitment, transportation, transfer, harbouring or receipt of children for the purpose of exploitation. Exploitation can be sexual in nature.

Dealing with a retrospective disclosure of abuse

The term retrospective abuse refers to abuse that an adult discloses that took place during their childhood. According to the Children First Act 2015, if a professional working with an adult receives such a disclosure, you must report this to Tusla (and to the HSCT if in Northern Ireland). The rationale for this is that the alleged abuser may continue to pose a risk to children. Jesuit personnel should also be aware of the reporting requirements of the Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012.



GUIDANCE ON MANDATED PERSONS (REPUBLIC OF IRELAND)

Mandated persons are people who have contact with children and/or families and who, because of their qualifications, training and/or employment role, are in a key position to help protect children from harm.

Schedule 2 of the Children First Act 2015 specifies classes of persons as Mandated Persons for the purposes of the Act. The section most relevant to Jesuit personnel is:

15 (g) member of the clergy (howsoever described) or pastoral care worker (howsoever described) of a church or other religious community.

Mandated persons have two main legal obligations under the Children First Act 2015.

These are:

- 1. To report the harm* of children above a defined threshold* to Tusla

 Note: Remember this may be present harm or abuse that occurred in the past but where
 there may be an ongoing risk to children.
- **2.** To assist Tusla, if requested, in assessing a concern which has been the subject of a mandated report.

What is meant by *harm?

Harm is defined as follows: 'harm means in relation to a child – (a) assault, ill-treatment or neglect of the child in a manner that seriously affects, or is likely to seriously affect the child's health, development or welfare, or, (b) sexual abuse of the child.' (Section 2 of the Children First Act 2015)

What are the *thresholds?

Neglect: The threshold of harm is reached when you know, believe or have reasonable grounds to suspect that a child's needs have been neglected, are being neglected, or are at risk of being neglected to the point where the child's health, development or welfare have been or are being seriously affected, or are likely to be seriously affected.

Emotional abuse/III-treatment: The threshold of harm is reached when you know, believe or have reasonable grounds to suspect that a child has been, is being, or is at risk of being ill-treated to the point where the child's health, development or welfare have been or are being seriously affected, or are likely to be seriously affected.

Physical abuse: The threshold of harm is reached when you know, believe or have reasonable grounds to suspect that a child has been, is being, or is at risk of being assaulted and that as a result the child's health, development or welfare have been or are being seriously affected, or are likely to be seriously affected.

Sexual abuse: If, as a mandated person, you know, believe or have reasonable grounds to suspect that a child has been, is being, or is at risk of being sexually abused, then you must report this to Tusla under the Children First Act.

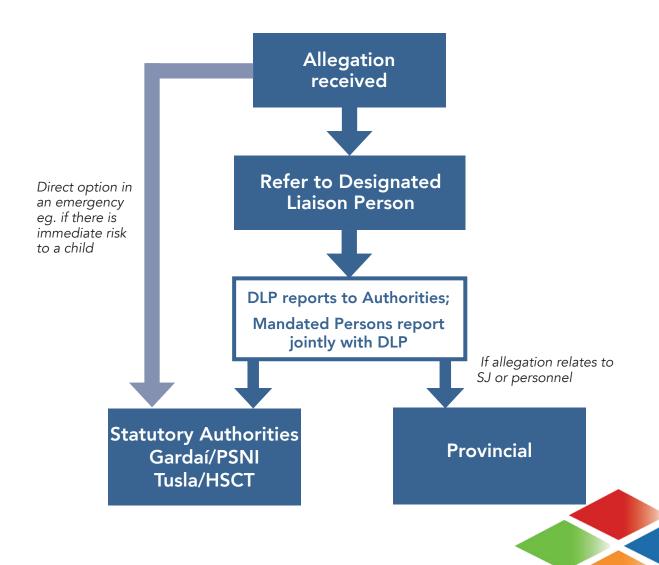
ROLE OF THE DESIGNATED LIAISON PERSON

Designated Liaison Person (DLP) and Deputy DLP: Best practice in child safeguarding according to "Children First: National Guidance for the Protection and Welfare of Children" indicates that organisations working with children/young people or their families should appoint a DLP to be the resource person to any personnel with child protection concerns and to liaise with outside agencies.

The DLP role is to:

- **1.** Act as the key resource person to any member of Jesuit personnel who has a child protection concern.
- **2.** Ensures that the reporting requirements of these procedures are followed correctly and promptly and that all appropriate records are maintained.

REPORTING OF CONCERNS



Action to be taken by all Jesuit Personnel (Jesuits, staff and volunteers)

If any member of Jesuit personnel, including Jesuits who are mandated persons, receives an allegation or has a suspicion that a child may have been abused or neglected, is being abused or neglected, or is at risk of abuse or neglect, they shall without delay report the matter to the DLP, who is responsible for ensuring that the reporting procedures outlined here are followed. In addition, personnel who are also mandated persons in the ROI are required to follow the procedures at "Action to be taken where a mandated person has a concern" in this section.

The DLP will then follow the procedure at "Action to be taken by the designated liaison person" in this section.

If any member of Jesuit personnel has a concern for the immediate safety of a child, they should report this to Tusla/HSCT or An Garda Síochána/PSNI without delay. They should inform the DLP at the earliest opportunity.

If the DLP decides that the report should not be reported to Tusla/HSCT, the DLP shall give a clear statement in writing as to the reasons why action is not being taken. If the reporter remains concerned, he or she should report the matter themselves or seek advice from Tusla/HSCT.

Action to be taken where a Mandated Person has a concern (Republic of Ireland)

Where a mandated person receives an allegation or has a suspicion that a child may have been abused or neglected, is being abused or neglected, or is at risk of abuse or neglect, they shall without delay report the matter to the DLP.

Firstly, the DLP and the mandated person must consider whether there are reasonable grounds for concern (described at the start of this chapter) about the welfare and protection of the child.

If the DLP and the mandated person both agree that there are reasonable grounds for concern they will both consider whether the concern is at or above the defined threshold of harm at which a report must be submitted as a mandated report to Tusla.

Where both agree that a mandated report should be made, they will submit a report jointly to Tusla using the Tusla report form.

Where there is uncertainty about whether a report should be made, they will seek advice from Tusla.

If the DLP decides that the report should not be reported to Tusla, the DLP shall give a clear statement in writing as to the reasons why action is not being taken. If the mandated person remains concerned, he or she should report the matter to Tusla.

Important note for mandated persons

The statutory obligation under the Children First Act 2015 to make a mandated report to Tusla rests with the mandated person and this applies regardless of whether the DLP makes a report or not. A mandated person who reports to Tusla jointly with the DLP meets their statutory obligation under the Children First Act 2015.

Action to be taken by the Designated Liaison Person

Where concerns about a child are brought to the attention of the DLP, or where an allegation of child abuse is made to the DLP, the following action will be taken:

- 1. Where the DLP is satisfied that there are reasonable grounds for concern they shall report the matter immediately to the statutory authorities. Where the DLP considers that the concern is at or above the defined threshold of harm for a mandated report, they shall submit it as such to Tusla. In cases where a mandated person has brought the concern to the DLP, the DLP and mandated person shall submit a joint mandated report.
- 2. Where there are child protection concerns but the DLP is not sure whether to report the matter, the DLP shall seek advice from duty social work. Children First National Guidance 2017 sets out that Tusla can provide advice in this regard and at this stage, identifying details do not need to be given.
- **3.** Where the alleged victim is an adult they should be informed that the person receiving the report has a legal obligation to report the information to the statutory authorities.
- **4.** Where the concern relates to a child, it is good practice to inform the parent/carer that a report is being made and the reasons for the decision to report. It is not necessary to inform the parent/carer where doing so might place the child at further risk or where the reporter may be put at risk of harm from the family.

Record-keeping, Confidentiality, and Data Protection

Where a concern or allegation arises during the course of Jesuit work or ministry, the DLP shall make a written record of the concern brought to their attention. They shall place this record in a secure location. All personnel must have due regard to the need for confidentiality at all times. All information regarding concerns of possible child abuse or neglect should be shared only on a "need to know" basis in the interests of the child. The test is whether or not the person has a legitimate involvement or role in dealing with the issue.

The Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) are designed to protect the rights of individuals with regard to personal data. The term 'personal data' means any information concerning or relating to a living person who is either identified or identifiable. The Acts give a right to every individual to establish the existence of personal data, to have access to any such data relating to him or her and to have inaccurate data rectified. It requires data controllers to make sure that the data they keep are collected fairly, are accurate and up-to-date, are kept for lawful purposes, and are not used or disclosed in any manner incompatible with those purposes.

Child protection concern about a member of Jesuit personnel

Where the concern or allegation is against a member of Jesuit personnel, the procedure at Part 2 of this chapter shall be followed by the DLP.

RESPONDING TO A PERSON MAKING AN ALLEGATION OF ABUSE

Where a child, young person or adult, discloses child abuse to a person working in any capacity for the Jesuits it is crucially important that the situation is handled sensitively and compassionately. It should be borne in mind that the person may feel that they have taken a huge risk in disclosing the abuse. Our response will help a person to disclose as much as they can remember, which will help any future investigation.

People may tell you about:

- Abuse that happened to them
- 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 that makes them feel uncomfortable.

Extra care needs to be taken if it is a child who is disclosing that they were abused. See guidance note on responding to children making allegations at the end of this section.

Where information is given in person, consider the following:

- Adopt a listening style that is compassionate, calm and reassuring. If the information given to you shocks, disgusts or distresses you, do not allow these feelings to show. If you do, you may inadvertently dissuade the person from giving any further information.
- 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 that cannot be kept, particularly in relation to confidentiality, but listen carefully to what is being sought in this regard.
- Explain the referral procedures to the person.
- 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. It is the responsibility of Tusla/ HSCT and An Garda Síochána/PSNI to investigate. There should be no probing for detail beyond that which has been freely given.
- Do not offer wording or language to the person making the allegation that may assist in the provision of an account of the concern or allegation.



Guidance on responding to a child disclosing abuse

- If a child tells you directly about abuse happening to them, you should allow them to speak and listen attentively. However, it is not appropriate to set up a meeting with a child for the purpose of receiving a disclosure or taking a statement. That is the role of the statutory services.
- The person receiving the allegation should be conscious that a child may feel very frightened and need reassurance and support that they have done the right thing in disclosing the abuse.
- The DLP will consult with Tusla/HSCT about informing the child's parents/guardians.
- If the allegation is about Jesuit personnel, explain to the child and their parents that the information must be reported to Church authorities, along with the statutory authorities.
- All offers of further support to the child should be conveyed via the child's parents or an appropriate adult.

The appropriateness of the response given to a complainant is vital to ensure that they feel heard and taken seriously.



PART 2: RESPONDING — INTERNAL CASE MANAGEMENT PROCESS FOR ALLEGATIONS AGAINST JESUITS, STAFF AND VOLUNTEERS & SUPPORT FOR COMPLAINANTS

PROCEDURE FOR ALLEGATIONS OF ABUSE AGAINST STAFF AND VOLUNTEERS

Action taken after reporting to statutory authorities

It is recognised that it is important that there is a fair procedure in regards to the management and investigation of allegations. A proper balance should be struck between protecting children and respecting the rights of respondents. Where there is a conflict, the child's welfare must come first.

Allegations against volunteers

- If the allegation is made against a volunteer, the manager/superior should consult with the DLP about whether the volunteer should remain in role during the investigation by the statutory authorities. Factors that influence this decision will include:
 - the volunteer's role:
 - their level of contact with children and an assessment of any risk that arises from this;
 - the degree of credibility of the allegation.

The DLP may wish to consult with the statutory authorities for guidance.

- The manager should consider appointing a person to offer pastoral support to the volunteer during any statutory investigation.
- Following the conclusion of any statutory authority investigation and assessment, where there is no case to answer and there are no outstanding child safeguarding concerns, if the volunteer has stepped aside they may be reinstated.
- If there is a case to answer the volunteer should be asked to permanently vacate the role.
- If the DPP decides to prosecute, the volunteer should be asked to permanently vacate the role.
- The Provincial should consider the need to conduct a review of safeguarding arrangements in the particular area where the volunteer was working, following conclusion of the statutory authority investigations. The purpose is to review whether all appropriate safeguards were in place and to take any corrective action required.



Allegations against Paid Employees

- If the allegation is made against a paid employee, the manager/superior should consult with the DLP about whether the employee should remain in role during statutory authority investigations and assessments. Factors that influence decision will include:
 - the employee's role;
 - whether the allegation relates to the employee's role in the Jesuits;
 - their level of contact with children and an assessment of any risk that arises from this;
 - the degree of credibility of the allegation.

The DLP may wish to consult with the statutory authorities for guidance.

- If a decision is made to suspend the employee, HR advice should be sought.
- Any suspension during the process of statutory authority investigations, and during any internal disciplinary action that may follow, should be with full pay.
- The manager should consider offering a pastoral support person to the employee.
- Following notification of a prosecution and/or conviction, a disciplinary process should be initiated. An investigator should be appointed by the Provincial (possibly DLP) to gather any evidence and provide a report to the Provincial.
- If the Provincial determines, based on the evidence that further action is required, the employee should be invited to attend a disciplinary meeting and may be supported at the meeting by a union representative or a friend.
- Any disciplinary hearing should be conducted by a panel of 3 individuals and be chaired by the Provincial.
- Any finding should be notified to the employee in writing.
- If the panel considers that the employee has committed gross misconduct, HR advice should be sought on how to dismiss the employee from their post.
- If the statutory authorities investigation results in no further action, an assessment of whether any misconduct has been committed should be undertaken by a suitably qualified person appointed by the Provincial.
- A disciplinary panel should be established to consider the investigating person's report and consider the future employment of the employee.
- The employee can be represented by a union representative or a friend at any disciplinary hearing.
- If a decision is made to reinstate the employee, appropriate support should be offered for a return to work.
- If a decision is made to dismiss the employee, and if the employee is resident or has worked in Northern Ireland, a referral must be made to the Disclosure and Barring Service (DBS) in accordance with the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007. The DBS website provides further information on checks, referrals and barred lists.
- Any appeal by the employee who has been disciplined/dismissed should be made in writing to an independent person appointed by the Church authority.



PROCEDURES FOR ALLEGATIONS OF ABUSE AGAINST JESUITS

Internal Case Management i.e. action taken after reporting to statutory authorities

"Respondent" refers to the person who has had an allegation made against them

- On receipt of an allegation, the priority is to ensure that information that has reached the
 threshold for reporting is referred to the statutory authorities. The DLP will check with the
 Police, if there is any reason as to why the information cannot be shared at that time with
 the respondent. In rare circumstances, the Police will ask the DLP to delay this so as not
 to hamper an investigation.
- If the threshold for reporting has been reached, a preliminary investigation in accordance with canon law will be initiated by the Provincial (CIC, c. 1717). This canonical inquiry will be paused to allow any statutory investigation to take place.
- At the earliest opportunity, the Provincial will call a meeting with the respondent and invite him to bring a person for support.
- The respondent is offered the accompaniment of an "advisor". The advisor is part of the Jesuit safeguarding structure. He/she accompanies the respondents to meetings and ensures that they are able to access professional services and supports.
- At the meeting, the DLP will share the details of the allegation with the respondent. The
 respondent will be invited to seek canonical advice and if appropriate, civil legal advice.
 He will be advised that he can respond to the allegation if he wishes and this will be recorded and referred to the statutory authorities. However, he does not need to make a
 response at this stage.
- The Provincial will judge the level of risk in consultation with the statutory authorities and the DLP. A decision will be made at this stage as to whether an interim management plan is required, which may include restrictions to sacred ministry.
- A written reminder is given to the respondent from the Provincial to advise him to continue following the child safeguarding policies and procedures.
- If required, the DLP and advisor will meet the respondent and present him with the interim management plan, which the respondent will be asked to agree to and sign. During this meeting, the respondent must be advised that the preliminary investigation will be resumed following the conclusion of any statutory authority enquiries.



Canonical Inquiry including Preliminary Investigation

- The preliminary investigation is the initial stage of the canonical inquiry. It is an inquiry into the facts and circumstances around the allegation. The investigator produces a written report for the Provincial. Conclusion of this report should enable the Provincial in deciding whether there is a case to answer, and that the case it is not manifestly false or frivolous.
- The preliminary investigation is completed once formal confirmation is received from the statutory authorities that their investigations have ended. The DLP may complete the investigation with the support of a canon lawyer or the Provincial may instruct another appropriate person/s to complete it.
- If the preliminary investigation finds there is no case to answer, the respondent should be advised that the case is closed and returned to ministry if relevant.
- If the preliminary investigation finds there is a case to answer, the Provincial must forward a report to the Congregation of the Doctrine of the Faith (CDF).
- The CDF will authorise the appropriate canonical process to be followed (e.g. a judicial penal process, an administrative penal process, confirm precept, etc.).

If there is no case to answer

If at the end of a preliminary investigation, it is found there is no case to answer, it is important that all outstanding matters be dealt with to allow the person to move forward with their life and ministry. Therefore, in preparation, the respondent should be provided with counselling and support to assist them to deal with any residual anger/distress. This may include spiritual direction, reflection and discussions with the Provincial or a member of leadership.

Risk management

- Once an allegation is received against a living member, a risk assessment and management process is engaged in. Protective measures may be taken at an early stage. This is covered in the earlier section "Procedure".
- Tools and templates for risk assessment and management plans are accessed from the National Board for Safeguarding Children in the Catholic Church in Ireland "Safeguarding Children- Guidance; www.safeguarding.ie".
- If there is an adjudication criminally or canonically that abuse was committed, a permanent management plan is put in place. A clinical risk assessment may be commissioned to inform this plan. The plan will detail, amongst other things, how the respondent is to be monitored.

Support

- While statutory and/or Church investigations are underway, pastoral support is offered to the respondent. They are provided with an advisor/support person and offered therapeutic support as well as canonical and legal advice.
- If the allegations are substantiated at the end of the canonical process, the person requires pastoral and therapeutic support and also to help address any offending behaviour.

SUPPORTING COMPLAINANTS

Those who have alleged child abuse should receive a compassionate response from Jesuit personnel and be offered access to appropriate care, advice and support. Complainants need to be listened to and heard to ensure that any allegation or disclosure of abuse is handled compassionately, effectively and professionally.

Pastoral care may be offered and provided by the DLP managing the case, the support person if taken up by the complainant, the Provincial at an appropriate time, or indeed another identified representative if there is something specific they can offer.

Disclosing abuse takes enormous courage and calls for a high level of trust. Child abuse by its very nature can damage trust; it is therefore imperative that when a complainant is ready to tell their story, the listener responds with great sensitivity and compassion.

How support is offered:

- Once an allegation has been received, the DLP will try to arrange a face to face meeting with the complainant, in a manner that respects the wishes of the person.
- The complainant may be accompanied by a person of their choice to the meeting.
- Every complainant is offered access to a support person. The role of the support person
 is to ensure that the complainant is appropriately supported throughout the process of
 disclosure and thereafter. It is the prerogative of the complainant whether or not they
 wish to accept the assistance of a support person.
- The complainant will be provided with details of support services and assisted in making an appointment if required.
- The Jesuits makes a commitment to funding such professional support, as appropriate.
- If the threshold for reporting has been reached, the DLP will help the complainant to understand the necessity to refer the matter to the statutory authorities.
- At an appropriate time in the process, the complainant will be invited to meet with the Provincial or another representative of the Jesuits if this is their desire. This meeting is not for the purpose of determining the outcome of any investigations, but for the Provincial to hear and acknowledge the experience of the complainant.
- At the end of this meeting, the support needs can be reviewed. Some complainants may wish to remain engaged with their Church despite the effect that the abuse may have had on their relationship with it, and, perhaps, with God. By meeting with and listening to complainants, the response from the Church that might best meet their spiritual needs can be identified with them. Towards Peace may be of assistance in this regard.
- The Jesuits are open to providing independent facilitation or mediation for meetings if this is required.
- A leaflet is available which can be given to people making complaints or considering it (Appendix 13).

CHAPTER 4



Quality Assurance



Quality Assurance

Quality assurance procedures are a systematic method of assessing the extent to which the safeguarding policy and procedures are implemented at all levels within the Jesuits. We want to ensure that a process of continuous improvement takes place.

Role of Safeguarding Committee

The role of the safeguarding committee is to oversee the implementation of

- **1.** The safeguarding procedures, particularly procedures relating to the creation and maintenance of safe environments;
- 2. The training plan;
- 3. The communication plan;
- 4. Self-auditing.

These functions are fulfilled by the safeguarding committee by producing and reviewing a safeguarding plan of how to maintain the safeguarding standards across the Jesuit Society. The Safeguarding Manager works very closely with the committee, usually completing the tasks identified. The committee coordinates the local safeguarding rep (LSR) network. This group of LSRs identify areas where guidance or support on policy or practice is needed and communicate safeguarding information.

Safeguarding Strategic Plan

The safeguarding strategic plan sets out what, how, who and in what time frame key elements of child safeguarding practices and procedures are going to be met.

It addresses such areas as training and communication, revision of policies and procedures, and safeguarding personnel. The annual self-audit and the annual report provided to the Provincial feed into the safeguarding plan.

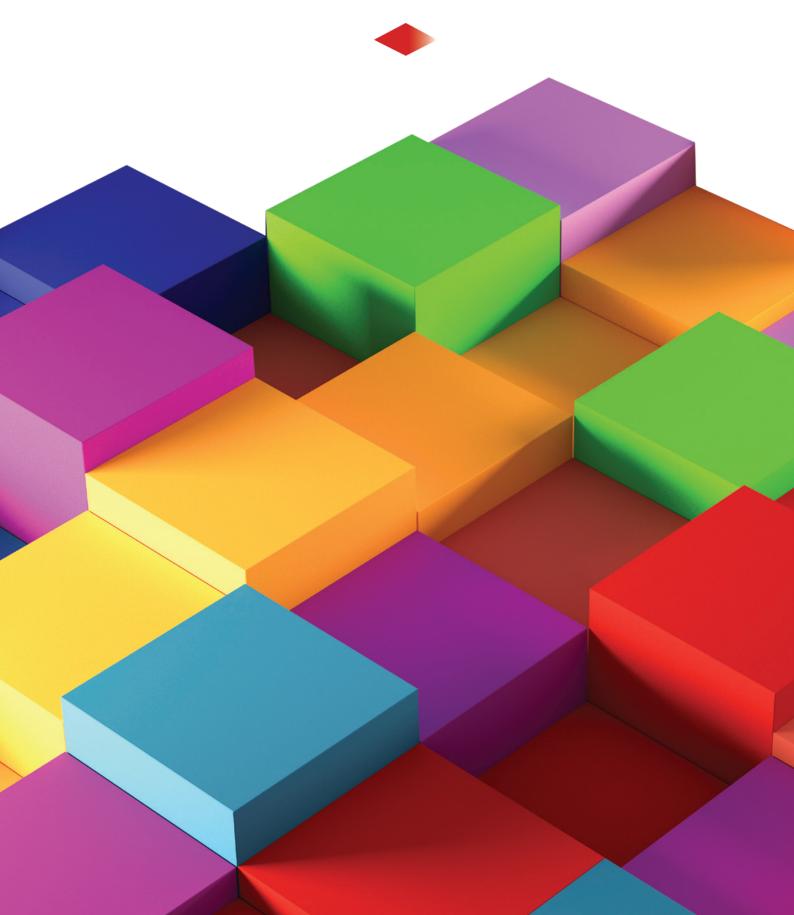
Audit and Quality Assurance

This is done by applying three methods:

- **1.** Assessing compliance during systematic visits to Jesuit centres or community houses.
- **2.** Annual self-audit scheme carried out locally and coordinated by the safeguarding committee (Self audit template Appendix 13).
- 3. External audits by the NBSCCCI and statutory agencies eg. Tusla.
- **4.** Commit to ongoing review of policy and procedures with a full review at a minimum of every three years.



Appendices





APPENDIX 1a: Agreement to Adhere to Safeguarding Policy

the JESUITS in IRELAND						
AC	SAFEGUARDING CHILDREN GREEMENT TO ADHERE TO SAFEGUARDING POLICY					
	I understand my responsibility and duty, as a priest working in the Irish Province of the Society of Jesus, in working to safeguard children and young people.					
	I agree to abide by the Jesuit's safeguarding policy, procedures and code of conduct in working with children and young people and will at all times honour and respect their right to safety and protection from harm and abuse.					
If applica	I confirm that the external organisation in which I minister has safeguarding policies and procedures in place and I agree that when ministering in this external organisation I will adhere to its policies and procedures.					
	Full name (print):					
	Signed:					
	Date:					



Appendix 1b: Employee Acceptance Form



SAFEGUARDING CHILDREN EMPLOYEE ACCEPTANCE FORM

I confirm that I adhere to the Safeguarding Children Policy and Procedures, and I am prepared to participate in any required training provided in this area
Full name (print):
Signed:
Date:
I have never been investigated by any police force or statutory health or a previous employer in relation to substantial complaints made concerning my treatment of children.
I agree to the Board of Management / Superior / Director of Work or organisation seeking a certificate from the Garda Síochána /PSNI to the effect that I have not been the subject of an investigation, prosecution or conviction relating to the neglect or the physical, emotional or sexual abuse of children.
Full name (print):
Signed:
Date:
(When signed, this should be placed in the person's personal file)



Appendix 2: Recruitment Checklist

		Tick when Action is Taken
The policy needs mention: Once your policy is in place, even prior to any recruitment, it is good practice to mention that you have a Safeguarding Children Policy in place: ■ On your web site ■ On promotional literature for activities or events		
 ■ In any advertisements for staff ■ On application forms and recruitment literature 		
Recruiting – Check contact with children What contact with children will be involved in the job? Will the person have unsupervised contact with children or hold a position of trust? What other forms of contact will the person have with children e.g. email, phone, internet?	BEFORE you recruit – is there contact with children in this job?	
Defining the Role Tasks & skills for the job are identified. The job description refers to working with & having responsibility for children where applicable.	Have a Job Description template	
Key selection criteria A list of essential & desirable qualifications, skills & experience.	Use this to screen applicants and for interview questions.	
Written application All applicants been asked to supply details requested in our application form including personal details, past & current work/ volunteering experience	Job Application form required	
Interview Two representatives meet with the applicant to explore information contained in the application. In advance, application forms should be considered, highlighting points to raise at the interview including:		
 The applicant's attitudes towards working with children Areas that need more detail Vague statements or unsubstantiated qualifications Frequent changes of employment 		



PPENDIX 2: RECRUITMENT CHECKLIST / PAGE 2		Tick wher Action is Taken
At Interview – Review Declaration Form Ensure applicants have signed the declaration stating 'there is no reason why they would be considered unsuitable to work with children'. Likewise ensure applicants have signed the declaration in respect of criminal convictions & pending cases against them.	Has the Declaration Form been signed? Complete 'For Official Use Only' section of the application form.	
Identification Applicants are asked for photographic documentation to confirm their identity e.g. passport, drivers licence.	Ask that they bring to interview – see originals (appendix 4)	
Qualifications Applicants are asked for documentation to confirm their qualifications.	Bring original documentation to interview	
References Applicants are asked to supply the names of 2 referees who are not family members & ideally who have first-hand knowledge of the applicant's experience of work/contact with children. Referees are asked specifically to comment on the applicant's suitability to work with children.	You make phone check	
Vetting procedures Has the vetting procedure for your selected applicant been carried out? (In the ROI An Garda Siochana central vetting unit if applicable. In N.I. Access NI vetting.)	Apply for vetting	
Records Details are kept of the selection & induction process on the personnel file of the person appointed. References are kept on file as part of the record of the recruitment process.	Keep all documentation for one year	
Confidentiality Information about the applicant should only be seen by those directly involved in the recruitment process. Applicants should be reassured that information about them, including information about convictions, will be treated in confidence & not used against them.	Ensure all written documents are secure and comply with data protection provisions.	
Training Incoming staff are made familiar with all the relevant provisions of this policy and related policies (Dignity at Work, Discipline, Grievance, I.T. etc.)		



Appendix 3: Sample Work Application Form For those with Substantial Access to Children

All information received in this form will be treated confidentially

Surname:	Forename:
Any other name previously know	n as:
Address:	
	DOB:
Tel:	Mobile:
PPS Number (R.O.I.):	N. I. Number (N.I.):
Are you (Please tick):	
Employed 🔲 Unemployed 🔲 S	Student 🔲 Homemaker 🔲 Retired 🔲 Other 🔲
	a & Relevant Qualifications C.V. or use additional pages)
	ious Work Experience C.V. or use additional pages)



Do you agree to abide by								
Yes No No	(copy included with this form)?							
Have you completed Child Protection Awareness Training? Yes No If yes, who was it organised by and when approximately:								
Do you agree to undergo specific training	ng for this position?							
Have you ever been asked to leave an organisation in the past? (if your answer is 'yes' we will contact you in confidence) Yes No No								
	vant Information e additional pages)							
	e people (ideally previous employers and not m personal knowledge are willing to endorse							
Name:	Name:							

Appointment is subject to the receipt of satisfactory references and vetting



Appendix 4: Confidential Declaration Form

The information contained in this form will be kept securely by the Jesuits. Legislation in both jurisdictions in Ireland has, at its core, the principle that the welfare of children and young people must be the paramount consideration.

Who should complete this form?

Everyone working or volunteering for the Jesuits, who will come into contact with children or the 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 offend								
or been the subject of a caution or binding								
If yes, please state below the nature and date(s) of the offence(s). Date of offence								
Have you ever been the subject of discipl or voluntary activity due to inappropriate l	inary procedures or been asked to leave employment pehaviour towards a child? Yes . No .							
If yes, please provide details including dat	re(s)							
Full name (print)								
	Place of birth							
	ing for?							
Declaration								
I understand that if it is found that I have wi	thheld information or included any false or misleading							
information above, I may be removed from	m my post, whether voluntary or paid, without notice.							
I understand that the information will be k								
I declare that the information I have provide								
Signed	Date							



Appendix 5: Identification requirements

(National Vetting Bureau Act 2012-2016)

Proof of Identity

At least two forms of identification must be produced to validate the identity of the applicant when completing the application. One of these should be photographic where possible. There is a points system for the verification of identity where 100 points must be reached. Different forms of identification are weighted with a sliding scale of points (see below). Where an individual cannot reach 100 points an affidavit witnessed by a Commissioner for Oaths will suffice. The National Vetting Bureau requires that copies of all proof of identity are retained for the validity of the vetting. This means if the vetting lasts 3 years then copies of these documents must also be kept for 3 years.

Identification	Score
Irish driving license or learner permit (new credit card format)	80
Irish Public Services Card	80
Passport (from country of citizenship)	70
Irish certificate of naturalisation	50
Birth certificate	50
Garda National Immigration Bureau (GNIB) card	50
National Identity Card for EU/EEA/Swiss citizens	50
Irish driving licence or learner permit (old paper format)	40
Employment ID	
– ID card issued by employer (with name and address)	35
– ID card issued by employer (name only)	25
Letter from employer (within last two years)	
– Confirming name and address	35



Identification	Score
P60, P45 or Payslip (with home address)	35
Utility bill e.g. gas, electricty, television, broadband (must not be less than 6 months old. Printed online bills are acceptable. Mobile phone bills are not acceptable)	35
Public services card/social services card/medical card	25
– with photograph	40
Bank/Building Society/Credit Union statement	35
Credit/debit cards/passbooks (only one per institution)	25
National age card (issued by An Garda Siochana)	25
Membership card	
– Club, union or trade, professional bodies	25
– Educational institution	25
Correspondence	
– From and educational institution/SUSI/CAO	20
– From an insurance compnay regarding an active policy	20
– From a bank/credit union or government body or state agency	20
Children under 16 years (any one of the following)	
– Birth Certificate	100
– Passport	100
– Written statement by a Principal confirming attendance at educational institution on a letterhead of that institution	100
Recent arrival in Ireland (less than 6 weeks)	
– Passport	100
Vetting Subject is unable to achieve 100 points**	
– Affidavit witnessed by a Commissioner for Oaths	100
TOTAL	



Appendix 6: Hazard Assessment Form

HAZARD ASSESSMENT FORM									
Name of group									
Date of hazard as	ssessment								
	Person completing the hazard assessment								
Hazard	Who is at risk?	likelihood of harm	Consequences	Controls needed					

Signed _____ Date ____



Appendix 7: Attendance Register for Large Groups

ATTENDANCE REGISTER FOR LARGE GROUPS

A minimum of two officially appointed leaders, who have completed the Church body recruitment process (including the provision of vetting/AccessNI checks, if appropriate), should be responsible for each activity involving young people. At least one of the leaders must have undergone a full-day training session provided by trainers registered with the NBSCCCI. These leaders must sign this sheet and put their initials under each date to confirm that the children/young people and adults marked were in attendance, as indicated by the 'time in' and 'time out' for each date.

Name (Children & Adults)	Date									
	Time in	Time out								
Londor's Cignature	latitala.	Initials	Initials	laitiala.	Latriala	Initials	Initials	Initials	la itala	Initials
Leader's Signature	Initials	IIIIIIais	IIIIIIais	IIIIIIdis	ITIILIdIS	IIIIIIais	IIIIIIais	IIIIIIais	Initials	IIIIIais
Leader's Signature	Initials	Initials								
Leader's Signature	Initials	Initials								



Appendix 8: Child and Guardian Joint Consent

CHILD AND GUARDIAN JOINT CONSENT

Data protection

This form will be held on file, in accordance with the data protection policy of the Jesuits. The data entered will be used only for the purpose indicated on the form. It may only be accessed by those with responsibility for managing records or group activities.

Group details (to be con	npleted by	organiser)						
Duration/frequency of act	ivity from:							
start date/time end date/time								
Group Name								
Name of organiser								
Details of the child/your	ng person							
Name of young person _								
Address								
Date of birth	Ger	nder(circle as appropriat	e) Male	Female				
Other relevant informat	ion							
(Please mention any med		'	, ,					
Please note that the org				•				
medication or intimate ca establish how your child o	an be accor	_	relevant poli	cies and procedures				
Guardian contact details	;							
Name								
Daytime phone number	Code	Local no						
Home phone number	Code	Local no						



APPENDIX 8: CHILD AND GUARDIAN JOINT CONSENT / PAGE 2

In cases of a medical emergency

In the event of illness or an accident, I give permission for medical treatment to be administered to my child, where considered necessary, by a suitably qualified medical practitioner and/or hospital. I understand that every effort will be made to contact me as soon as possible. In an emergency I can be contacted at the telephone numbers provided on the previous page:

Signed
Child's/young person's consent (insert full name)
would like to take part in the event listed on the previous page.
(If relevant please tick the boxes below)
I understand that photographs may be taken during the group activities, and I give my permission for these to be used in any hard copy/online (delete as appropriate publications by the
■ I understand that videos (which may include webcam) may be taken during the group activities, and I give my permission for these to be used in any hard copy/online (delete as appropriate) publications by the (insert name of Church body).
I understand that during group activities I will be appropriately supervised at all times and will agree to abide by the group's code of behaviour.
Guardian's consent I agree to allow the above-named child/young person to attend meeting(s) of the
in accordance with the permission granted by (insert name or
child/young person) above. I understand that there will be suitable supervision and an agreed code of behaviour while the children/young people are in the care of the organisers.
SignedName (Block letters)
Relationship to child/young person
Signed
Child/young person



Appendix 9: Accident Form

FORM FOR DEALING WITH ACCIDENTS/INCIDENTS

Group details	
Name of group	
Name of group leader	
Names of others present_	
Accident details	
Date and time of accident	/incident
Name of person involved	
Date of birth of person inv	volved
Emergency contact details	s for the person involved (usually parent/guardian)
Name	Telephone number
Action taken during and fo	ent/incident that occurred (continue on separate sheet if necessary).
People contacted (include	dates and times)
If medical attention was re	equired, please note the name and address of the medical facility and
the people who treated th	e person involved in the accident/incident.
Please detail any follow-up	o action required.
Name of person completing	
Signed	Date



Appendix 10: Form for Use of Jesuit Property by External Groups

FORM FOR USE OF JESUIT PROPERTY BY EXTERNAL GROUPS

We welcome other organisations/groups/individuals within the community using our facilities. While using our facilities, we want to be assured that all reasonable steps have been taken to safeguard children¹ and young people. The responsibility for complying with good safeguarding practice (including safe recruitment and vetting) rests with the group using Jesuit property and not with the Jesuits.

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

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

Conditions of use of Jesuit property by outside bodies:

- It is the responsibility of any group using Church property to run activities involving children to ensure that they comply with all applicable child safeguarding and protection legislation and guidelines.
- The group should have their own child safeguarding policy and procedures. The group is also responsible for liaising with Tusla/HSCT to ensure that the policy and procedures meet the statutory requirements. The Church body cannot assist any outside group in developing a child safeguarding policy.
- The Church body should obtain confirmation in writing from the group that they have a child safeguarding policy and appropriate insurance.

We would ask that you complete the following questionnaire. If any response is not applicable (N/A), please provide details of why this does not apply to your organisation.

If you feel your application requires further information, please attach on an additional page. Please indicate when additional information is provided in support of your application.

1 The term 'child' refers to a person under the age of eighteen years.



APPENDIX 10: FORM FOR USE OF JESUIT PROPERTY BY EXTERNAL GROUPS / PAGE 2

Name of group/organisation	
Purpose or proposed activities	
User group, e.g. children, adults	
Facilities required	
Date of commencement of use	
Date of completion of use	
Frequency of use	
Hours of use:	
(1) Commence at	(a.m./p.m.)
(2) Finish at	(a.m./p.m.)
Names and addresses of persons who	will be in charge during use:
(1)	
Telephone number	
(2)	
Telephone number	
Do you have your own child safeguard	ling policy and procedures? Yes 🗍 No 🗍
Do you have appropriate (public liabil	ity and/or employer's liability and professional indemnity
insurance cover for the activity? Yes	No 🗍
Name of insurance company	
Policy number	
Period of cover	
Limit of indemnity	
To be signed by official/coordinator	of the organisation/group.
Signed	Print name
Position	Date



Appendix 11 Protected Disclosure Policy (often referred to as "Whistle-blowing")

All Jesuit members, staff and volunteers must acknowledge their individual responsibility to bring matters of concern to the attention of their Supervisor/ Superior/Provincial.

Although this can be difficult to do, it is particularly important where the welfare of children may be at risk. If you have a concern, do not let the fear of getting it wrong become a barrier to speaking to the appropriate person eg. line manager, Superior. It is the responsibility of the person you report to, to inquire further and assess if there are grounds for action.

You may be the first to recognise a concern, but you may be unsure about whether and how to express your concerns. Listed below are some issues which stop people from making a disclosure. The Jesuits recognise that such things as feeling disloyal to colleagues, or being fearful of harassment, are real concerns and we will ensure that you feel supported to make a disclosure. It is imperative that you come forward as the protection and welfare of children is our priority. Remember, it is often the most vulnerable children or young people who are targeted. These children need an advocate to safeguard their welfare.

Reasons for making a disclosure

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

What stops people from making a disclosure

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



How to raise a concern

A "protected disclosure" can be about a range of concerns, not just child protection. It is important to:

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

What happens next?

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

Self-reporting

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



Appendix 12a: Complaint Procedure

A complaint is defined as a grievance and/or the raising of a concern about breaches of codes of behaviour. Allegations or suspicions of child abuse do not fall into this category of general complaints, and should always be dealt with in accordance with guidance at Standard 2. This complaints procedure is not for use by Jesuit personnel who would use the protected disclosure procedure to raise their complaint.

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

A copy of a complaints form is available at Appendix 11.

If a parent/guardian, young person or child is not satisfied with any aspect of the running of a particular activity, or the behaviour of any individual involved in that activity, the following steps should be taken:

First step

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

Second step

- **1.** The Provincial/local Superior/Manager ("Jesuit representative") should be contacted by completing a complaints form. They have eight weeks to consider the complaint.
- **2.** A letter acknowledging receipt of the complaint will be sent within seven calendar days, enclosing a copy of the complaints procedure.
- 3. All complaints will be thoroughly investigated.
- **4.** The Jesuit representative may organise a meeting to discuss and hopefully resolve the complaint. This communication may also take place by telephone if a meeting is not possible. Unless exceptional circumstances, this will be done within fourteen calendar days of sending the acknowledgement letter to the complainant.
- **5.** Within seven days of the meeting or discussion, the Jesuit representative 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 Jesuit representative 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 Provincial or Jesuit representative again.

At the conclusion of this step, the Provincial may decide to take further action on the complaint. If, however, the Provincial decides not to take further action, the process is completed.



Appendix 12b: Complaint Form



COMPLAINT FORM

All complaints arising during a Church-related activity (with the exception of complaints about child abuse) should attempt to be resolved by discussion between the parties involved. If this is not possible, this form should be completed and sent to the Church authority.

Name		
Email	Telephone number	
Details of complaint (continue on se	eparate sheet if necessary)	
Signature	Date	



Appendix 13a: Sample Self-Audit Form (Communities)



SAFEGUARDING SELF-AUDIT CHECKLIST FOR RECTOR/SUPERIOR

Name of Community: _					
Please describe the nat	ture of contact which you	ur Centre/area has with cl	nildren (Under 18s)		
A) Please list all Jesu	it members in the rel	evant categories below	v:		
Continue on sheet at e	end if required)		,		
Category 1	Category 2	Category 3	Category 4		
In a Jesuit ministry with (or VP: vulnerable persons) *See end for definition of vulnerable persons	In ministry but not with children (or VP)	In ministry with children (or VP) but with another organisation (Please also name the organisation below)	Retired with no unsupervised ministry with children		
B) Please list all emp responsible:	loyees and volunteer	s working within the a	rea for which you ar		
Category 1		Category 4			
Staff & Volunteers v children or VP (inclu	•	Staff & Volunteers not working with children or VP (include role)			



APPENDIX 13A: SAMPLE SELF-AUDIT FORM (COMMUNITIES) / PAGE 2

C) Local Sateguarding Representative: Do you have a person nominated in t	nis role?								
Yes No Details:									
D) Safeguarding Policy Statement									
Is the Jesuit Child Safeguarding Policy Statement prominently displayed? Yes No									
Are all members, workers and volunteers aware of the policy and how to access it?	? Yes 🗍	No 🗖							
Are the contact numbers for the following inserted on the Statement notice?									
Name of Local Safeguarding Representative (LSR):Yes 🗍 N									
The Designated Person (DLP): Saoirse Fox 086 3441707; safeguarding@jesuit.ie	Yes 🔲	No 🔲							
The Assistant DLP: Declan Murray SJ; 086 8288719; socius@jesuit.ie	Yes 🔲	No 🔲							
Local Tusla duty social work office:	Yes 🔲	No 🔲							
Local Garda Station:	Yes 🔲	No 🗍							
E) Safeguarding Training									
Considering members, employees and volunteers in Categories 1-3 in the tal	oles abo	ve:							
Can you confirm that all have completed safeguarding training offered by the	Jesuits	or by a							
Diocese within the last 3 years? Yes No									
Please advise of any person who requires training and has not completed in the l	ast 3 yea	ars:							
F) Garda Vetting Considering members, employees and volunteers in Categories 1-3 in the tal Can you confirm that all have Garda Vetting, applied for within the last three relevant ministries? Only tick 'yes' if you have verification of this. Yes No									
Comments:									
(See explanatory note attached on Garda Vetting or contact Saoirse Fox for assistance)									
G) Safe Recruitment									
In recruiting workers and volunteers can you confirm that you are following prope	er proced	dures as							
outlined in the Jesuit Safeguarding Policy Document? Yes 🗍 No 🗍									
Confirm that persons under the age of 18 are not employed by the community/a	postolat	е							
Yes No No									



APPENDIX 13A: SAMPLE SELF-AUDIT FORM (COMMUNITIES) / PAGE 3

H) Com	muni	cation w	ith othe	rs										
Do you	allow	external	groups t	to u	se yo	ur pro	operty	and	do	any	of	these	groups	att

Do you allow external groups to use your property and do any of these groups attend with children?

Signed:

Date:

"Vulnerable person" is defined in the National Vetting Bureau (Children and Vulnerable Persons)
Act 2012:

Means a person, other than a child, who —

- a) Is suffering from a disorder of the mind, whether as a result of mental illness or dementia
- b) Has an intellectual disability
- c) Is suffering from a physical impairment, whether as a result of injury, illness or age, or
- d) Has a physical disability

Which is of such a nature of degree -

- i) as to restrict the capacity of the person to guard himself or herself against harm by another person, or
- ii) that results in the person requiring assistance with the activities of daily living including dressing, eating, walking, washing and bathing.

Explanatory note on Garda Vetting:

Members:

Garda vetting is a legal requirement since April 2016. Unless a member is fully retired and not available for any ministry, he needs to be Garda vetted. Vetting is not transferable across organisations and across roles. This means that the member may have vetting for a specific role within another organisation eg. school, hospital. He still needs to be vetted separately for the role of 'priest' by the Jesuits or by the Diocese. Every 3-5 years is best practice for re-vetting.

Employees & Volunteers:

If employees or volunteers have more than incidental contact with children through their Jesuit role, they will need to be Garda vetted. Please note that Garda vetting is part of a safe recruitment process and not the whole process. Other steps such as verifying references and seeking police clearance from other countries where the person lived are equally important.

Safeguarding Manager Saoirse Fox or Socius Liam O'Connell can provide guidance to any person with questions about Garda vetting.



Appendix 13b: Sample Self-Audit Form (Apostolates)



CHILD SAFEGUARDING SELF-AUDIT FOR IRISH JESUIT APOSTOLATE

Name of Apostolate:	
Please describe the nature of contact which yo	ur Centre/area has with children (Under 18s)
A) Please list all Jesuit members minister below: There is more space provided on the l	ring in your area in the relevant categories ast page should it be required
Category 1	Category 2
In a ministry with children (or VP: vulnerable persons) *See end for definition of vulnerable persons	In a ministry but not with children (or VP)
B) Please list all employees and volunteer responsible:	rs working within the area for which you are
Category 1	Category 4
Staff & Volunteers working with children or VP (include role)	Staff & Volunteers not working with children or VP (include role)



APPENDIX 13B: SAMPLE SELF-AUDIT FORM (APOSTOLATES) / PAGE 2

C) Local Safeguarding Representative: Do you have a person nominated in this role?
Yes
D) Safeguarding Policy Statement
Is the Jesuit Child Safeguarding Policy Statement prominently displayed?
Are all members, workers and volunteers aware of the policy and how to access it? Yes 🗍 No 🗍
Are the contact numbers for the following inserted on the Statement notice?
Name of Local Safeguarding Representative (LSR): Yes 🗍 No 🗍
The Designated Person (DLP): Saoirse Fox 086 3441707; safeguarding@jesuit.ie Yes 🗍 No 🗍
The Assistant DLP: Declan Murray SJ; 086 8288719; socius@jesuit.ie Yes 🗍 No 🗍
Local Tusla duty social work office: Yes 🗍 No 🗍
Local Garda Station: Yes No
E) Safeguarding Training
Considering members, employees and volunteers in Categories 1-3 in the tables above:
Can you confirm that all have completed safeguarding training within the last 3 years?
Yes No No
Please advise of any person who requires training and has not completed in the last 3 years:
Considering all personnel, have you identified other safeguarding training needs eg. role specific training, awareness raising workshop
F) Garda Vetting
Considering members, employees and volunteers in Categories 1-3 in the tables above:
Can you confirm that all have Garda Vetting, applied for within the last three years, for their relevant
ministries? Yes No No
In the tables above, please write GV beside each person's name for whom you can confirm has vetting in place ie. you have seen the vetting disclosure or had confirmation from the DLF
Comments:
(See explanatory note attached on Garda Vetting or contact Liam O'Connell or Saoirse Fox for assistance)



APPENDIX 13B: SAMPLE SELF-AUDIT FORM (APOSTOLATES) / PAGE 3

Safe Recruitment
recruiting workers and volunteers can you confirm that you are following proper procedures
outlined in the Jesuit Safeguarding Policy Document? Yes 🗍 No 🗍
onfirm that persons under the age of 18 are not employed Yes 🗍 No 🗍
Communication with others
you allow external groups to use your property and do any of these groups attend with
ildren?
Signed:
Date:



Appendix 14: Anti-Bullying Protocol

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

What is bullying?

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

Bullying can be:

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



Prevention

To help prevent bullying, the following strategies are suggested:

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

Procedures to deal with bullying

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



Appendix 15: Guidance on the use of technology, photographs and videos

Jesuit representatives need to assess the benefits of technology and how this can be used safely and effectively, in line with rules that respect the dignity and rights of all users, particularly children. The majority of occasions when people use mobile phones, computers or take photographs of children do not provide any cause for concern. However, there are occasions when this is not the case. At the outset it is important to identify the risks associated with the use of technology, and then to minimise the risks by putting in place measures outlined below.

Consent

The consent of parents/guardians and children should always be sought prior to engaging in any activity that involves the use of IT equipment. General consent may be sought at the outset or it may be decided to ask for permission for set occasions.

Use of Internet

It is recognised that the internet is valuable and widely used. When used in Jesuit contexts, clear guidelines must be developed and inserted into the code of behaviour for each activity involving children.

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

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

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

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



Texts & Emails

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

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

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

Using bulk (or bundled) text and email messaging

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

The following guidance is provided to minimise risk to all:

- 1. Consent must be obtained from young people and their parents/guardians prior to sending young people text or email messages. Parents/guardians of younger children should be offered the option to be copied on texts and emails that their child will be sent.
- 2. The young people's mobile phone numbers or email addresses should be stored safely and securely with access only available to the specific identified members of personnel.
- **3.** All text and email messages must be sent via a bundle to a group of young people, i.e. the same standard text message is sent to every member of the group.
- **4.** Young people should not be given the opportunity to text or email back to the system. It should only be used as a one-way communication channel.



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. If the Jesuits want to use images of the children they work with, or are otherwise in contact with, should consider these guidelines.

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

Risks to children

A child should not be able to be identified through a photograph. 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 Jesuit website or publication.
- Never supply the full name(s) of the child or children along with the image(s).
- Only use images of children in suitable dress and focused on the activity, rather than one particular child.
- Obtain permission: the permission of parents/guardians and children should always be sought when using an image of a young person.

Using photographers

Photographers are often employed in Church contexts for certain sacramental or Church activities. When using a photographer, it is important to do the following:

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

Responding to concerns

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



Appendix 14: Addendum

Online Ministry and Safeguarding

The Covid-19 Pandemic contributed to some who minister and work in church-based organisations considering engaging with people online. This is to be encouraged but it is important that we are alert to the need to safeguard oneself and others if using this newer medium. Some points to consider:

- Engaging one-to-one online carries the same risks as doing so in person. Working
 online with young people should happen in groups and with the signed consent of
 guardians.
- A code of behaviour establishing acceptable use of the forum should be devised, with and for the group. It is worth considering some ground rules; creating safe spaces and explaining these at the introduction to each session.
- If using an interactive forum, it is especially important in the code of behaviour to establish expectations around how people will interact.
- Question of inclusivity: Will anyone be excluded because they do not have access to the right technology?
- Are you using a personal device or one belonging to the organisation? Where will you be using it? Consider security of devices and data on them.
- If live video and audio is being used, there should be careful consideration of the location that everyone uses.
- Remind personnel of safeguarding obligations. Report any safeguarding incidents or potential concerns according to the Jesuit Safeguarding Procedures.
- Remind participants of who they can contact within the service for help or support.
- Keep a record of who attends sessions. If the session is recorded, be mindful of data protection principles.
- Participants and parents may have concerns about images and voices being transmitted remotely over the internet so it is important that participants and parents are informed that the use of mobile phones or other devices to photograph or record staff or other participants for the purposes of publication elsewhere is strictly prohibited and in breach of those individuals' basic human right to privacy.
- If the service you use records the conference, make sure that everyone is aware of this. It is important to know how long any recordings are kept for and how to access them.



Appendix 16 INFORMATION FOR THOSE AFFECTED BY ABUSE

(Presented in Leaflet Format)

Support for those affected by abuse

Many people have suffered throughout their lives because of abuse they experienced as children. The effects can be devastating. We wish to offer support to those who have been affected in this way. The following supports are provided by the Jesuits:

- An identified person known as a 'Support Person' will be made available to any person who makes a complaint of abuse against a Jesuit. The support person can help you to understand the process involved in making a complaint, they will listen to you, and they can help you to access professional support services.
- A pastoral meeting with the Provincial or an identified other is available at the appropriate time
- The Church has established an independent professional support service 'Towards Healing' which can be accessed free of charge to those who experienced abuse (Contact details overleaf)
- Spiritual support services are available through 'Towards Peace' (contact details overleaf)

Contact Us

Designated Liaison Person:

Ms. Saoirse Fox

safeguarding@jesuit.ie

01-4987333

Deputy Designated Liaison Person:

Fr. Declan Murray SJ

socius@jesuit.ie

01-4987333



desuit Procedures

Safeguarding Childnen



Information for Complainants and Survivors of Child Abuse

Jesuit Curia, Milltown park, Sandford Road, Dublin 6 Tel: 01 498 7333

Useful Contacts

An Garda Siochana

Dedicated Freephone for the reporting of child sexual abuse 1800 555 222

Tusla Child & Family Agency

www.tusla.ie/services/child-protectionwelfare/contact-a-social-worker

Towards Healing

Freephone: 1800 303 416 www.towardshealing.ie See info overleaf

Towards Peace

01-5053028 www.towardspeace.ie See info overleaf

One in Four

01-6624070

www.oneinfour.ie
Therapy and advocacy service for
survivors of sexual abuse

The Designated Liaison Person

Contact details for the Designated Liaison Person (DLP) are overleaf. Their role is to ensure that all child protection concerns are responded to and managed in accordance with civil law and church policy. If you decide to make your complaint directly to the Jesuits, the DLP is the person who will hear your complaint and explain the process to you.

Making a Complaint of Abuse

- People are encouraged to report information on child abuse directly to the Police and/or the Child Protection Service (see useful contacts)
- * Meeting the DLP: Every person will be heard with compassion and in a spirit of acceptance. The needs of the person will be prioritised in choosing the location, time and pace of a meeting.
- A Offering support: The person making a complaint is encouraged to bring somebody with them to the meeting for support. They will be offered a Jesuit "support person" and given information on professional support services.

- Referral to the statutory authorities:

 The DLP will advise of the Jesuit's responsibility to report information on child abuse to the Gardai/PSNI and Tusla/HSCT
- Confidentiality: Any information shared is treated as highly confidential and only shared with those with a legitimate need to know eg. statutory authorities.
- Role of An Garda Siochana/PSNI: It is the responsibility of the Police to investigate and establish if a crime has been committed. An Garda Siochana will not make contact with a victim/survivor without their consent.
- * Role of Tusla/HSCT: It is the role of the social services to promote the welfare and protection of children. They will assess if a person poses a risk to children.

