



Catholic Institute for Deaf People
Interim Child Safeguarding and Protection Policy
April 2017

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Introduction

This is the interim child safeguarding and protection policy of the Catholic Institute for Deaf People (CIDP). It has been prepared to comply with *Children First: National Guidance for the Protection and Welfare of Children, 2011* and other related laws and guidelines detailed in Chapter 1. It is an interim policy and will be revised to take account of the full implementation of the Children First Act 2015, expected to occur by the end of 2017.

Safeguarding refers to all the policies, procedures and practices that contribute to the creation and maintenance of a safe environment for children. Child protection concerns are allegations that a child has been abused or a suspicion that abuse may have occurred. The work of child protection consists in the recognition of, response to, and reporting of such concerns.

A child, as defined by the *Child Care Act 1991*, is a person under the age of 18 years excluding a person who is or has been married. In this document the terms 'child' and 'young person' both refer to children, so defined. Thus, the term 'young Deaf person' refers to a child with a hearing impairment.

All of those who work for or on behalf of CIDP are required to familiarise themselves with this policy and to operate in accordance with its requirements. Training in child safeguarding and protection will be provided in order to assist them to do so.

In their work for or on behalf of CIDP, staff and volunteers are required to operate in compliance with this policy in their dealings with all children, that is, children who avail of CIDP services and children who visit CIDP premises or are involved in any activities run by CIDP.

This policy sits alongside of the child protection policy of Holy Family School for the Deaf. The reporting requirements within the school are those described in *Child Protection Procedures for Primary and Post-Primary Schools, Department of Education and Skills, 2011*. An appropriate information sharing protocol is in place between CIDP and the school, with the agreement of parents, to ensure seamless child protection procedures apply across the school and boarding campus.

Some of the students attending Holy Family School and staying in the boarding campus are over 18 and not, therefore, children. CIDP has the same commitment to the safety and protection from abuse of these young adults as it does to the safety and protection of children. The safeguarding practices outlined in Chapter 4 of this document apply when dealing with young adults availing of services provided by CIDP. However, the reporting requirements differ when it comes to dealing with concerns for the welfare and protection of young adults. The reporting requirements outlined in Chapter 3 do not apply.

This is not a vulnerable adult protection policy. Some of the young adults availing of the services provided by CIDP may fall within the definition of a vulnerable adult and thus come within the remit of the HSE's *Safeguarding Vulnerable Persons at Risk of Abuse: National Policy and Procedures* but not all of them do. These issues will be addressed in a CIDP adult safeguarding policy to be developed to complement this one.

Chapter 1

Mission Statement

Catholic Institute for Deaf People

CIDP is committed to the creation and maintenance of a welcoming, nurturing and safe environment for all children. CIDP supports the physical, spiritual, social, educational and moral development of each young Deaf person so that she or he may take their place in society as a mature person. CIDP operates within a Christian ethos that welcomes children from all backgrounds and faith traditions.

Child Safeguarding Policy Statement

CIDP recognises the right of every child to dignity of life and bodily integrity and is committed to ensuring that she or he is respected, nurtured, cared for and protected. This commitment is binding on all those who work for and on behalf of CIDP.

In accordance with Article 3 of the UN Convention on the Rights of the Child and Irish domestic law and guidelines, CIDP places the best interests of children as the primary consideration in all matters that relate to their welfare.

CIDP discharges its responsibility for the care and protection of the young Deaf people in partnership with their parents or guardians and in close cooperation with the civil authorities, most particularly Tusla, the Child and Family Agency, and An Garda Síochána.

This policy has also been written to take account of and/or comply with:

- The Irish Constitution;
- The Child Care Act, 1991;
- The Protection for Persons Reporting Child Abuse Act, 1998;
- Our Duty to Care, Department of Health and Children, 2002;
- Children First: National Guidance for the Protection and Welfare of Children, Department of Children and Youth Affairs, 2011;
- The Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act, 2012;
- Children First Act, 2015;
- National Vetting Bureau (Children and Vulnerable Persons) Act, 2012 – 2016.

CIDP: Core Values and Principles

CIDP is committed to:

1. A child – centred approach. This involves:
 - a. Valuing children and demonstrating respect for them;
 - b. Listening to them and taking their views seriously;
 - c. Involving them in decision making in accordance with their age and stage of development;
 - d. Dealing with their concerns and complaints and those of their parents/guardians promptly and effectively;
 - e. Setting clear limits, appropriate to their age and stage of development, for their behaviour.
2. Working in partnership with the parents or guardians of young Deaf people availing of services provided by CIDP.

CIDP acknowledges that it provides services for young Deaf people only with the informed consent of their parents or guardians. CIDP is committed to discharging its responsibility to parents and guardians by providing for the care of their children in a manner that acknowledges and respects the parents' and guardians' role as the primary guardians of their children.

3. Operating within national child protection guidelines as set out in *Children First* and promptly reporting all concerns for the safety and welfare of children to the relevant civil authorities.

The reporting procedures are set out in Chapter 3 of this document.

4. Choosing carefully those who work with young Deaf people.

Recruitment procedures are described in the employee handbook of CIDP. Those working with CIDP undergo vetting both before taking up their position and at intervals of three years thereafter.

5. Ensuring that those working for and on behalf of CIDP and its subsidiaries understand what is expected of them in their dealings with children as described in Chapter 4.
6. Making proper arrangements for the care of the children on the campus and when taken off-campus by CIDP staff, as set out in the operational policies of CIDP.
7. Keeping good records of work with children.

Evaluation and Review

The implementation of this policy will be assessed on a continuing basis by the CEO and staff of CIDP. It will be subject to systematic review by the Safeguarding Policy Committee of the CIDP Board at regular intervals of no less than two years as required under the Children First Act 2015. In addition the policy will be updated as the various sections of that Act come into operation, with particular reference to the requirement to produce a Safeguarding Statement and to describe and incorporate the role of Mandated Persons.

Chapter 2

The Safeguarding Structure of CIDP

The CEO has overall responsibility for the safety and welfare of children in CIDP and is the designated liaison person (DLP) under *Children First* for CIDP. A child protection concern that comes to light in any part of the organisation must be reported to the CEO. The CEO reports to the Board of CIDP on child protection matters and the CEO maintains regular contact with the Chair and alerts her to any issues of concern.

The Safeguarding Policy Committee is a committee of the Board of CIDP. The Board appoints the members of this committee. It is comprised of the Chair and other members of the Board, the CEO and such other persons as the Board has determined can contribute to its work. It reports to the Board. Its role is to present safeguarding and related policies to the Board in draft form for consideration, approval and adoption. It also exercises oversight, on behalf of the Board, of the implementation of such policies and of their evaluation and review. It is not directly responsible for the implementation of safeguarding policy. This responsibility rests with the CEO and those who work for CIDP in the boarding campus, chaplaincy and other services.

As set out in *Children First* (3.3) the DLP:

- acts as liaison with outside agencies and a resource person to any staff member or volunteer who has child protection concerns,
- is responsible for ensuring that the reporting procedure (described in the next chapter) is followed,
- is knowledgeable about child protection and undertakes training to keep himself updated on new developments.

The residential managers are the deputy DLPs for the boarding campus and can act for the DLP in his absence. They must, however, report to him on his return.

All concerns for the safety and welfare of children must be reported without delay to the DLP. The DLP will decide on notification to the civil authorities, having consulted with other staff as appropriate.

Every other person who works for or on behalf of CIDP has a responsibility for the safety and welfare of children. In particular they are required to:

- acquaint themselves with this policy and sign to confirm that they have done so;
- behave in accordance with practice requirements set out in Chapter 4;
- attend safeguarding training, which will be delivered on a three year cycle to include full one-day training, refresher training and training in relation to specific areas of safeguarding, as determined by the DLP;
- report any concerns that they have for the safety and welfare of children.

Sharing of Information with Holy Family School for the Deaf

In order to provide for the safety and welfare of the children availing of services provided by CIDP in a comprehensive and seamless manner, information relating to the welfare and protection of those children who attend Holy Family School for the Deaf and stay in the CIDP boarding campus is shared between teaching and care staff on a need to know basis. That is, teachers share with care staff and care staff share with teachers information that they each need to know in order to care for and protect the children for whom they share a responsibility. It is the responsibility of the CEO and the School Principal, respectively, to oversee the necessary steps within their organisations to ensure timely and appropriate sharing of information between the school and all other CIDP services.

Child protection concerns that arise within Holy Family School for the Deaf are notified to the civil authorities by the Principal and those that arise within CIDP are notified by the CEO, both acting as DLPs for their respective organisations. Where they are sending notifications that relate to young people who attend the school and live on the CDP boarding campus they alert each other that they are doing so.

The school Principal and Deputy Principal, the CEO and residential managers of CIDP and representatives of the Child Safeguarding and Protection Service of the Archdiocese of Dublin meet regularly in order to:

- Provide a systems check to ensure that the proper procedures have been followed in relation to child protection concerns arising within the school and residences and/or in relation to the pupils and residents, with particular reference to notification to the civil authorities and to necessary information sharing,
- Provide an opportunity for the diocesan Child Safeguarding and Protection Service to offer advice and assistance to the schools and boarding campus on child protection and welfare issues,
- Provide a learning environment where best practice can be shared across the schools and boarding campus,
- Identify the training needs of those working in the schools and boarding campus and to draw up plans to implement these,
- Review policy and procedure and amend these in light of experience,
- Identify gaps in the service provided to the school pupils and those staying in the boarding campus and to consider how such gaps can best be addressed.

The parents of the children attending Holy Family School for the Deaf and boarding on the CIDP campus sign a consent form to permit sharing of information relating to the protection and welfare of their children between teaching and care staff.

Chapter 3

Dealing with Child Protection Concerns

All concerns for the safety and welfare of a child within CIDP must be reported to the Designated Liaison Person. Staff or volunteers should report any child protection concerns to their immediate line manager in the first instance. However, if the safety of children requires it they may go directly to the DLP. Similarly, staff and volunteers may take their concerns directly to the civil authorities, if they have grounds to believe that the safety of a child requires them to do so. Having done so, they should inform the DLP.

The DLP will:

- conduct such preliminary enquiries as are required under Children First (5.3) to determine whether the concern reaches the threshold for reporting to the civil authorities¹;
- report the concern to Tusla without delay using the Standard Reporting Form (Appendix 3), where the threshold for reporting has been reached,
- draw up an interim safety plan to minimise risk to the young Deaf person in question in consultation with care and other staff (as appropriate),
- consider whether there are implications for the safety of other young Deaf people within the boarding campus and, if so, take appropriate protective measures;
- liaise with Tusla and, as appropriate, An Garda Siochana, and assist with any assessment or investigation,
- inform Tusla of the interim safety plan and invite feedback on its adequacy;
- assess the need for further safety measures once the outcome of the Tusla assessment and/ or Garda investigation is known and ensure that these are implemented.

Reasonable grounds for concern

Children First states that Tusla, the Child and Family Agency “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” (3.2.2). It goes on to state that “Child protection concerns should be supported by evidence that indicates the possibility of abuse or neglect” (3.2.3).

The DLP decides whether reasonable grounds exist for reporting to Tusla.

If a child or an adult discloses abuse in childhood that must be reported. Guidance on dealing with disclosures of abuse is given in Chapter 4 and this should be followed. Similarly, if a person witnesses a child being abused, that should be reported. There will be some situations where the situation is less clear cut. However, any concern for the safety and welfare of a child should be reported to the DLP who will determine whether the threshold for reporting to Tusla has been reached. If in any doubt the DLP will consult with Tusla on whether formal notification is required.

The diocesan Child Safeguarding and Protection Service is available to offer advice and assistance.

¹ Children First only requires reporting to Tusla, the Child and Family Agency. However, reporting to An Garda Siochana in addition to reporting to Tusla is indicated in certain circumstances. This is discussed further in Chapter 4.

Dealing with concerns that arise within the boarding campus

Measures for dealing with concerns for the safety and welfare of young Deaf people arising from their contact with each other must take account of CIDP's duty of care to all of those involved. This issue is considered in more detail in Chapter 4 under 'Anti-bullying policy and procedures for dealing with peer abuse'.

Measures for dealing with concerns for the safety and welfare of children arising from their contact with those working for or on behalf of CIDP must take account of the principle that the interests of the child is the primary consideration. Fair procedures for dealing with allegations of assault or abuse against members of staff or volunteers should be followed. These are set out in the CIDP employee handbook.

Direct reporting to the civil authorities

There may be a variety of reasons why a member of staff or a volunteer would choose to bypass the normal reporting channels and report directly to the civil authorities. It may be, for example, that in a situation where there is an immediate threat to a child's safety the most appropriate intervention is to call An Garda Síochána. This should be reported as soon as possible to the DLP.

The DLP may decide that notification to the civil authorities of a particular concern is not appropriate. Any person is entitled to take their concerns directly to the civil authorities, if they disagree with the DLP's decision. This should also be reported as soon as possible to the DLP.

A person may have concerns about the practice of colleagues or managers or the organisation as a whole and may decide to bring these concerns to the attention of the civil authorities. The CIDP 'Whistle-blower Policy' (Chapter 4) covers such situations and is designed to ensure that those who raise such concerns will not suffer adverse consequences for doing so.

Chapter 4

Keeping Children Safe: Policies and Practice Guidelines

CIDP has a range of policies that, while not specifically safeguarding policies, contribute to the creation and maintenance of safe environments for children. These include policies such as those for the recruitment, induction and training of staff that are set out in the employee handbook. There are also policies followed in the boarding campus, such as those on key working and intimate care, that contribute to the safety of children. All of these policies are available on request. They are kept under review to reflect best practice and changes to guidelines and legislation.

4.1 Good practice guidelines for all those working with children on behalf of CIDP

These guidelines apply to all those working for CIDP in the boarding campus, chaplaincy and other services and activities involving children. They express core CIDP values set out in Chapter 1 of this document. They are intended to sit alongside the professional ethics of particular professionals, such as social care workers, who work for CIDP.

Good safeguarding practices can never be reduced to a set of rules. Not every situation can be anticipated. Professional staff must bring their training and professional judgment to bear in their work. While good safeguarding practice protects those who work with children, reference to 'safeguarding rules' is never an acceptable reason not to respond to the needs of a child. It could never be acceptable, for example, to leave a child or children unattended on the basis that the recommended number of staff or volunteers are not available.

Two principles underpin safeguarding practice with children. These are transparency and accountability. Transparency means openness in dealing with children. In many instances, though not in all, it means being visible to colleagues when dealing with children. It always means the worker explaining what she is doing, especially if it marks a departure from normal practice. The explanation is given to the child, to colleagues and to others who have a legitimate interest in knowing about the matter.

Accountability is closely related to transparency. It is about explaining the reason for taking a particular course of action. As with transparency, the account is given to the child, to colleagues and to others with a legitimate interest in the matter which will, for time to time, include parents or guardians. The requirements of transparency and accountability are additional to the ordinary requirements that employees have to report to their managers and employers. Safe environments are those in which there are clear and open lines of communication across the organisation as well as up and down the reporting lines.

Those working for or on behalf of CIDP commit to:

- treating children, their parents or guardians with justice, courtesy and respect;
- learning appropriate means of communicating with young Deaf people, with particular reference to the use of Irish sign language (ISL);
- listening to and demonstrating respect for the views of children;
- respecting each child's personal boundaries;

- assisting children to develop their own sense of their rights and their responsibilities to others;
- developing a culture where children can speak openly about anything that may be worrying them;
- operating in accordance with this policy and national child protection guidelines;
- challenging and reporting abusive or potentially abusive behaviour;
- maintaining confidentiality with respect to sensitive information;
- developing and maintaining appropriate working relationships with other staff and volunteers.

Those working for or on behalf of CIDP will not:

- physically chastise a child;
- develop a sexual relationship with a child;
- develop a relationship with a child which is in any way exploitative or abusive;
- place a child at risk of abuse;
- permit a child to be bullied;
- use sanctions that humiliate or harm a child;
- condone rule violations by a child;
- show favouritism to a particular child;
- take a child to their own home;
- use foul or inappropriate language with a child;
- tell inappropriate or sexually suggestive jokes to a child;
- present for work under the influence of alcohol or illegal substances;
- smoke in front of a child;
- do things of a personal nature for a child that they can do for themselves.

4.2 Responding to a disclosure of child abuse

These guidelines, originally developed by Barnardos in 2011 and here adapted, have been developed with children in mind. However, the same principles apply when dealing with an adult who discloses that he or she was abused as a child. Following disclosure, the reporting procedure, as set out in Chapter 3, must be followed.

If a child or adult asks to speak to you in confidence it is important to tell them, before you proceed, that certain kinds of information have to be shared.

- Be as calm and natural as possible. Remember that you have been approached because you are trusted and possibly liked. Do not panic.
- Be aware that disclosures can be very difficult for the child.
- Remember, the child may initially be testing your reactions and may only fully open up over a period of time.
- Listen to what the child has to say. Give them the time and opportunity to tell as much as they are able and wish to. Do not pressurise the child. Allow him/her to disclose at their own pace and in their own language.
- Conceal any signs of disgust, anger or disbelief.
- Be careful when asking questions. Question should be supportive and for the purpose of clarification only. Avoid leading question such as asking whether a specific person carried out the abuse. Also, avoid asking about intimate details or suggesting that something else may have happened other than what you have been told. Such questions and suggesting could complicate the official investigation.
- Assure the child that you believe them. False disclosures are very rare in young children.
- It is important to differentiate between the person who carried out the abuse and the act of abuse itself. The child quite possibly may love or strongly like the alleged abuser while also disliking what was done to him/her.
- It is important therefore to avoid expressing any judgment on, or anger towards, the alleged perpetrator, while talking with the child.
- It may be necessary to reassure the child that your feelings towards him/her have not been affected in a negative way as a result of what he/she has disclosed.

Do not promise to keep secrets

At the earliest opportunity tell the child that:

1. You acknowledge that they have come to you because they trust you.
2. You will be sharing this information only with people who understand this area and who can help. There are secrets which are not helpful and should not be kept because they make matters worse. Such secrets hide things that need to be known if people are to be helped and protected from further ongoing hurt.

By refusing to make a commitment to secrecy to the child you do run the risk that they may not tell you everything or indeed anything, there and then. However, it is better to do this than tell a lie and ruin the child's confidence in yet another adult. By being honest, it is more likely that the child will return to you at another time.

**Think before you promise anything.
Don't make promises which you cannot keep.**

At the earliest possible opportunity:

1. Record in writing, in a factual manner, what the child has said, including, as far as possible, the exact words used by the child;
2. Inform the DLP at the earliest opportunity;
3. Maintain appropriate confidentiality (see next section).

Ongoing Support

Following a disclosure by a child, it is important that the staff member continues in a supportive relationship with the child.

Disclosure is a huge step for many children. Staff should continue to offer support particularly through:

- Maintaining a positive relationship with the child;
- Keeping lines of communication open by listening carefully to the child;
- Continuing to include the child in the usual activities.

Any further disclosure should be treated as a first disclosure and responded to as outlined above.

Where necessary, immediate action should be taken to ensure the child's safety.

4.3 Information sharing, confidentiality and data protection

Information sharing for the purposes of protecting children is not a breach of professional confidentiality, provided it is shared only with those who need to know it.

CIDP recognises the importance of ensuring every person's right to confidentiality and is committed to keeping confidential all personal information in so far as this is possible and lawful. When a child protection concern arises the information is shared on a "need to know" basis, that is, it is shared with those who need to know it in order to ensure that children are protected from harm. The information is shared in accordance with the requirements of national child protection guidelines, this policy and as required by law. Sharing information about child protection concerns, following the procedure outlined in this policy, with the appropriate authorities is not a breach of confidentiality. Those who work for or on behalf of CIDP cannot give an undertaking to any person not to disclose information about child protection concerns on the grounds of confidentiality.

The **Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012** creates an offence of failing to disclose to the Gardai, without reasonable excuse, information relating to certain specified serious offences against a child or a vulnerable person, where it is known or believed that the information will be of material assistance in securing the apprehension, prosecution or conviction of another person known or believed by the first person to have committed an offence. The specified offences include most sexual offences and others such as assault causing harm, abduction, manslaughter and murder.

The **Protection for Persons Reporting Child Abuse Act 1998** provides immunity from civil liability to persons who report child abuse to the relevant authorities "reasonably and in good faith". Even if the reported concern proves unfounded, the person taking action against a reporter would have to prove that he or she had not acted "reasonably and in good faith". As well as providing protection from civil liability, the Act protects reporters from being penalised by their employers for reporting child abuse. However, it is an offence to report child abuse in the knowledge that the information reported is false.

Data protection legislation attempts to ensure that an individual's rights to privacy and dignity are respected, particularly regarding the use and sharing of personal data (information), whether the personal data is held electronically or in manual form.

Under the **Data Protection Acts 1988 and 2003**, CIDP is required to:

- (i) Obtain and process personal data fairly;
- (ii) Keep it only for specified, explicit and lawful purposes;
- (iii) Process personal data only in ways compatible with the purposes for which it was obtained;
- (iv) Ensure that personal data is kept safe and secure;
- (v) Ensure that personal data is accurate, complete and up to date;
- (vi) Ensure that personal data is adequate, relevant and not excessive;

- (vii) Retain personal data for no longer than is necessary for the purposes for which it was obtained; and
- (viii) Give a copy of his/her personal data to any individual on request.

The records of the CIDP that contain personal information are stored in secure, locked fireproof cabinets and can only be accessed by members of staff. Computer records are password protected and encrypted. Those staff members accessing computer records are required to log on to CIDP computers using their own personalised password.

Records relating to child protection concerns are retained for 100 years. Other records are removed once they are no longer required for the purpose for which they were created.

Those on whom the CIDP holds personal data are entitled to it subject to limited exceptions. Applications to obtain such personal data should be made to the CEO in writing.

4.4 Anti bullying policy including procedure for dealing with peer abuse

Bullying is defined as repeated acts of physical, verbal or psychological aggression. CIDP does not tolerate bullying of children in the boarding campus or in any of its facilities or activities.

This policy is supported by strategies designed to minimise the risk of bullying and to deal with incidents if and when they arise.

CIDP promotes a culture of openness that encourages children and young people to express their concerns and worries (see, for example, 4.5 on dealing with complaints).

Young Deaf people staying in the boarding campus are encouraged to share responsibility for each other's welfare with those caring for them, in accordance with their age and stage of development. This is achieved by assisting the children and young people to develop a code of behaviour to guide them in their dealings with each other and by addressing, in an appropriate manner, any breaches of this code.

When issues of victimisation of particular young people arise, these are addressed with the young people both individually and, as appropriate, in groups. The focus of these interventions is on the behaviour that is causing distress, rather than the personality of the young person whose behaviour is problematic. Assistance is provided to those who have engaged in bullying behaviour to help them to address and overcome their unacceptable behaviour.

Any young person who is victimised is offered immediate support. S/he is assured that s/he is not to blame for what has or is happening and that concrete steps will be taken to address the issue.

In any situation where a young person is physically or sexually assaulted by another young person, this is dealt with as a child protection concern that requires to be notified to Tusla as described in Chapter 3. A notification is required in relation to **both** the victim and the perpetrator of the assault. The standard procedure is for the notification to be sent to Tusla but there may be circumstances in which a notification is also sent to An Garda Síochána. The threshold for reporting to An Garda Síochána may be reached when any of the following apply:

- the assault is not the first such incident;
- harm has been caused;
- medical attention beyond immediate first aid is required.

The DLP will decide on reporting to An Garda Síochána, taking account of the views of professional colleagues. In any situation where there is doubt the advice of the Garda National Protective Services Bureau (01 666 3430; NBCI.SCMU@GARDA.IE) will be sought.

Where one young person has assaulted another, the parents or guardians of both must be informed at the earliest opportunity. The DLP will decide who is best placed to do this. The parents or guardians will be given a full account of what has occurred and of the steps taken by CIDP to address the matter. They will also be advised of their right to discuss the matter with the civil authorities (Tusla and/or Gardai) irrespective of whatever CIDP has done in terms of notification.

A young person who persistently acts in a manner that presents a risk or causes harm to others presents a particular challenge for CIDP. A careful assessment of the needs of the young person will be carried out and shared with Tusla. The capacity of CIDP to meet these

needs will be considered and discussed with Tusla who may be asked to source or provide additional services.

CIDP may conclude that it cannot discharge its responsibility for the safety and protection of all of the young people in the boarding campus by continuing to provide a service to a young person who consistently harms other young people. Such a position will be arrived at only after very careful consideration by all of those concerned, including the board of CIDP. A careful record will be made and retained of the steps taken to address the problematic behaviour, the discussions with parents/guardians, other professionals and the civil authorities. In addition, CIDP will work with the parents/guardians and other professionals involved to identify a suitable alternative service for the young person.

4.5 Complaints policy

CIDP welcomes complaints as a means of learning how its services are received so that it can improve the service provided. CIDP further understands that effective complaints systems contribute to keeping children safe by giving them a voice.

A simple way of understanding a complaint is as an expression of dissatisfaction. The children and young people with whom CIDP works and their parents and guardians have a right to complain about any aspect of the service, are encouraged to do so and are assured that their complaints are taken seriously and acted upon.

CIDP recognises that children and their parents or guardians may never use the term 'complaint' when expressing dissatisfaction with some aspect of the service. There is a responsibility on CIDP staff to recognise a complaint and to respond appropriately. Professional staff are expected to be sensitive to the children with whom they work and to be able to tell from their behaviour, demeanour or from verbal cues when children are unhappy or upset.

Complaints are best addressed as close as possible to the source of the problem. For example, if a member of staff inadvertently does something to upset a young Deaf person a simple, direct and unqualified apology is the most appropriate response.

Where a matter cannot be resolved in this simple and direct manner, another member of staff should assist in bringing about resolution through negotiation and mediation. If this does not work, the matter should be referred to the person in charge, such as the residential manager.

Complaints that cannot be resolved within the service in question should be referred to the CIDP Complaints Officer. The Complaints Officer will meet with the parties and attempt to resolve the matter to the satisfaction of all parties. The Complaints Officer may find that there has been poor or inappropriate practice and make recommendations for improvements in the service provided. These recommendations will be acted on without delay. The Complaints Officer will provide a report on the matter to the CEO and Board of CIDP.

When complaints relate to the behaviour of staff or another young people other procedures may have to be invoked such as the staff disciplinary procedure (see employee handbook) or the child protection procedure, as outlined in the previous chapter. Where such procedures are invoked they are additional to and not a substitute for attempts to resolve the unhappiness or dissatisfaction of the child or parent.

All complaints, other than those dealt with immediately are recorded in a complaints book detailing the efforts made at resolution and their outcome. The DLP will examine this book on a regular basis.

Exceptionally, there may be complaints that cannot be resolved through a process of negotiation and mediation and a formal process may be required with the involvement of an independent third party. Such a process will only be used after all other means of resolution have been exhausted. The decision to proceed on this basis will be taken by the Chair of CIDP having consulted with the CEO, DLP and other Board members, as appropriate.

4.6 Whistleblowing policy

The purpose of this policy is to encourage those who have concerns for the welfare or safety of children receiving services provided by CIDP to express their concerns without the fear that they will be victimised or harassed for so doing. This policy applies to all of those who work for or on behalf of CIDP.

There is protection under civil law for those who report child protection concerns (4.3 above).

It may be difficult to raise concerns about the practice of colleagues. There can be a reluctance due to:

- fear of getting it wrong and damaging the career or reputation of a colleague;
- fear of disrupting working relationships;
- fear of not being believed;
- fear that the information will be used inappropriately, precipitating a chain of events that spirals out of control.

These considerations have to be considered in the light of the following:

- the responsibility of everyone working for or on behalf of CIDP for the safety and welfare of children;
- that raising a concern in a timely manner can prevent a bad situation from spiralling out of control;
- that raising a concern about one situation can reduce the risk of a similar situation arising in another part of the organisation;
- that raising a concern about poor or inappropriate practice will prevent the person raising the concern from becoming implicated in such practice.

CIDP is committed to ensuring that any person who raises a concern for the safety or welfare of a child arising from their involvement with the organisation will not be victimised, harassed or in any way disadvantaged provided that the person is acting reasonably and in good faith.

Any person who is concerned about poor or inappropriate practice or behaviour towards children or young people in CIDP should try to establish the grounds for their concern. They may, for example, observe the practice or behaviour in question, note their observations, ask about the rationale for it, check with the children and their parents if they are comfortable with the way things are being done and/or discuss their concerns with colleagues.

As described in Chapter 3 of this document, the concern should be first reported to the person's line manager. However, the person may decide to take the concern directly to the DLP or to the civil authorities. Whatever decision the person takes, the concern will be taken seriously, investigated and the appropriate action taken. At another point, there may need to be a discussion as to why the person was unable to take their concern to their line manager or to the DLP (if he or she has gone directly to the civil authorities) but this will be after the concern itself has been addressed. If the person concerned believes that their concern has not been heard or taken seriously or that they have suffered negative consequences for raising the concern, they should bring the matter to the attention of the CEO who will, in turn, inform the Chair of the Board.

The Child Safeguarding and Protection Service is available to provide advice and support to any person who is concerned about the safety and welfare of any child in CIDP. Andrew Fagan (Director) or Julie McCullough (Child Protection Officer) are available during office hours on 01 8360314. They can also be contacted by email on: andrew.fagan@dublindiocese.ie and jmccullough@abhouse.org.

4.7 Use of mobile phones, IT equipment and social media

All staff and volunteers are expected to familiarise themselves with the policy on use of information technology and social media set out in the employee handbook and to operate in accordance with it.

Those who work for and on behalf of CIDP must observe appropriate professional boundaries with the children they encounter through their work and this requirement applies to their use of information technology, mobile phones and social media. Staff and volunteers should not use any of these media to initiate or maintain personal relationships with the children. In particular, they should not:

- gather or retain a young person's mobile phone number except where this is done for a specific purpose related to their work with CIDP;
- provide a young person with their own personal mobile phone number or email address;
- access the internet with a young person unless authorised to do so as part of their work with CIDP;
- befriend a young person on a social media website such as Facebook;
- take photographs of young people without obtaining their permission and that of their parents;
- communicate with a young person by email except where this is done with CIDP approval and from a CIDP email address;
- communicate with a young person by text except where this is done with CIDP approval and from a CIDP mobile phone.

The young people staying in the boarding campus require guidance and assistance in their use of these new media and they should be protected from online bullying. Use of IT and social media should be addressed within the code of behaviour for young people mentioned above (4.4).

Care staff should engage with the young people in relation to their use of the internet and assist them to understand, for example, the implications of sharing personal information and photographs on social media sites.

Any computers used by the young people in the boarding campus should be suitably protected and their use monitored.

Appendix 1

Definitions of Child Abuse (from *Children First*)

The abuse of children is generally categorised under four headings:

- physical abuse
- emotional abuse
- sexual abuse
- neglect.

It is important to remember that children may suffer different forms of abuse. The sexual abuse of children, for example, is also a form of emotional abuse when it takes place in the context of a relationship of trust.

Physical abuse

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

Emotional abuse

Emotional abuse is normally to be found in the relationship between a parent/carer and a child rather than in a specific event or pattern of events. It occurs when a child's developmental need for affection, approval, consistency and security are not met. Unless other forms of abuse are present, it is rarely manifested in terms of physical signs or symptoms.

Sexual abuse

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

Neglect

Neglect can be defined in terms of an omission, where the child suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, and/ or medical care.

Appendix 2



An Ghníomhaireacht um
Leanaí agus an Teaghlach
Child and Family Agency

FORM NUMBER: CC01:01:01

STANDARD REPORT FORM

(For reporting CP&W Concerns)

A. To Principal Social Worker/Designate: _____

1. Date of Report _____

2. Details of Child

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

3. Details of Persons Reporting Concern(s)

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

4. Parents Aware of Report

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

5. Details of Report

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

STANDARD REPORT FORM

(For reporting CP&W Concerns)

6. Relationships

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

7. Household composition

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

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

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

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

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

10. Details of person completing form

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

Appendix 3

Notifying Tusla of Child Protection Concerns

The notification should be sent to the Principal Social Worker for the area in which the child lives. The contact details can be found on www.tusla.ie by going to 'Our Services' and clicking on 'Contact a Social Worker' under 'Child Protection and Welfare'.