

**Handbook of Procedures:
Nurturing a Culture of Safeguarding**

Part 1

Safe Personnel

The following Procedures are associated with the Standard of Nurturing a Culture of Safeguarding. This first section “Safe Personnel” addresses the processes that are in place in the Irish Province to ensure that persons who are working with vulnerable populations, including children, are safe people to do so.

This section offers the processes and procedures for recruitment and selection. It also outlines the commitments to ensure that personnel are sufficiently trained and supported in their roles.

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	In Forms
Application form	In Forms
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.	In Forms
Positive identification check in compliance with requirements of National Vetting Bureau Act	In Forms
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.

In Northern Ireland, Jesuit personnel working with children apply for Access NI vetting. The Police Act 1997 (Criminal Records) (Disclosure) is the legislation that allows for an enhanced criminal record check for those engaged in regulated activities with children and vulnerable adults. The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 sets out the activities and work that are 'regulated activities' and that a person who has been barred by the Disclosure and Barring Service must not do. Vetting is carried out in Northern Ireland if a member of Church personnel engages in a regulated activity. An enhanced check can disclose non-conviction information or 'soft intelligence' if the police consider it is relevant to the role. This could be

an incident that did not go to court, or information about an ongoing police investigation. An enhanced check also includes a barred list check for anyone applying to do paid or voluntary work that is a regulated activity. A barred list check involves checking whether the individual is part of barred lists of people who are prevented from doing certain types of work. Full detail of the vetting legislation, including definitions of 'Regulated activities relating to children' can be viewed here https://www.legislation.gov.uk/nisi/2007/1351/pdfs/ukxiem_20071351_en.pdf

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.

Re-Vetting: It is recommended that applicants be re-vetted at least every three years.

Please note that all information received through the recruitment process is personal sensitive data. It should be gathered and stored in a manner compliant with data protection law.

Jesuits visiting from overseas and seeking to minister

Procedures to be followed by visiting Jesuits from outside Ireland wishing to minister on a short- or medium-term basis.

When Jesuits (or other clergy) from outside Ireland visit with the intention of being involved in short-term ministry in the Irish Province, evidence should be provided that confirms they are in good standing in their own Province and that they are fit for ministry.

Jesuits who come from parts of the world where police vetting arrangements are not in existence may seek to minister in Ireland. As a consequence, the statutory route is not always available as a means of confirming that there is no adverse information known about them that would prevent them from carrying out ministry in Ireland.

- Prior to visiting Ireland, where there is an intention to engage in public ministry, all visiting priests must write seeking permission of the Provincial, giving details about the duration of the visit, the type of ministry and the location of ministry being considered. The contact details of the Provincial or Bishop of the visiting priest must be provided in advance;
- Upon receipt of a request from visiting clergy to carry out ministry, the Provincial must acknowledge the same, and then make a request in writing to the visitor (NBSCCCI Template available on www.safeguarding.ie) for a celebret or confirmation of good standing (NBSCCCI Template available);
- The visiting priest must be asked to complete a declaration of good standing form (Template available);
- A vetting check must be carried out through the Garda National Vetting Bureau/AccessNI (as outlined earlier in this document);
- If the Provincial is satisfied that there are no concerns about the visiting religious,

permission should be given in writing to the visitor, outlining the specified ministry, including its duration and location (Template available);

- A copy of this permission should be forwarded to the local superior of the visitor, and also to the parish priest or local superior of the location of the ministry outlined in the letter;
- A copy of the permission should be stored in the Provincialate, in line with confidentiality and storage of information.

Issuing of Celebrets

All Jesuits who are in good standing and available for public ministry are given a celebret card by the Provincial and it is updated annually. The Provincial ensures that the Jesuit has in-date police vetting before giving a celebret. The celebret is carried by the Jesuit and available for inspection when the Jesuit is seeking to minister in new locations.

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 (In Forms).
- 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.

Working with Children: Supervision, Support & Training (ctd)

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 must complete a full day safeguarding training session at least every three years. To fulfill this requirement, the Safeguarding Manager gives an annual input at each Jesuit community covering safeguarding and professional standards.
- 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 Conduct 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.

Interface between personal and professional life:

While it is appreciated that there is a difference between working and personal hours the commitment to uphold the wellbeing of children and protecting them for abuse and exploitation extends beyond our working hours. We should ensure our personal behaviours do not put children at risk. Examples include: responsible use of social media specifically when speaking about children or when on platforms that children may have access to, not supporting or engaging in corporal punishment, being mindful of social spaces where children are present.

If an adult acts in such a way publicly, yet in their personal life, that raises concerns about their suitability for working with children, this can be addressed as a breach of the code of conduct

Code of Conduct for Adults Working with Children (ctd)

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”. 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.

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

Organising and Running Activities Safely for Children

Organising and Running Activities Safely for Children

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 (In Forms)
- Devising a Code of Behaviour for the Group
- Having an Anti-Bullying Policy
- 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

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Hazard assessment

Children's First Safeguarding Statement including organizational "risk to children" assessment: Available on www.jesuit.ie

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 (In Forms)

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 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 for minimum supervision ratios:

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

It is essential that written consent is received from parents and from the child or participate confirming that they wish to participate in the activity. Consent form template is in Forms. .

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 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. These needs require extra attention from 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 (In Forms). 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.

Safe Use of Digital Media

Digital media is any kind of information or content that is created, shared, or viewed using computers, smartphones, tablets, or the internet. It is recognised that the internet and other forms of digital media (WhatsApp, texting etc.) are valuable and widely used. It is important from a safeguarding perspective to identify the risks associated with the use of technology and to minimise the risks by putting measures in place. Responsibility is about safeguarding children, taking care of oneself, one's co-workers and group leaders.

1. Consent

The consent of parents/guardians and children should always be sought prior to engaging in any activity that involves the use of digital media.

When seeking consent, it is important to share clear information about the activity e.g. photographs will be taken for what purpose and how will they be captured, group whatsapp will be used for communicating what and to whom, what safeguards will be in place.

2. Guidance on use of texting and email

With texts and emails between children participating in Jesuit activities and an adult leading an activity, there is a risk of inappropriate contact and grooming for sexual abuse. There are also risks for the adults involved such as their communication with young people being misinterpreted. One-to-one texting or emailing is strongly discouraged and should only occur in exceptional circumstances.

A way to minimise the risks is to use group/bulk messages. This is where the same text or email message is sent to several young people involved with a particular activity or group. It should be used as a one-way communication

channel without the option for young people to text back. Parents/guardians should be offered the option to be copied on texts or emails. In fact, up to a certain age, it is more likely that communications would go directly to a parent rather than a child.

3. Guidance on use of photography

The use of photos on websites and hard copy publications can pose direct and indirect risks to children and young people. The Jesuits and its apostolates have responsibility for safeguarding if there is plan to use the photographs for the church/apostolate's purposes.

One of the risks is the possibility of a child being identifiable through a public photograph and therefore vulnerable to individuals looking to groom children for abuse. A child and their location can be identifiable even where their full name and address is not published. There is also a risk that the photo itself will be used inappropriately by others. Photos can be easily copied and adapted, perhaps to create images of child abuse, which can then find their way on to other websites.

Ways of minimising risks:

- If the photographer is employed for a Jesuit activity with children, police vetting should be sought;
- Provide a clear brief about what is appropriate in terms of content and behaviour;
- Do not allow unsupervised access to children or one-to-one photo sessions;
- Clarify in writing who owns the images taken by the photographer and how they will be edited, used and destroyed.
- Parents/guardians and parishioners at an organised event should be made aware of what is permitted in terms of photography and video;
- Never supply the full name(s) of the child

- or children along with the image;
- Only use images of children in suitable dress and focused on the activity, rather than on one particular child.

4.Guidance on use of CCTV and webcams

The use of CCTV is governed by data protection law and the controller of the technology must be aware and compliant in regard to their data protection obligations e.g. use is for a specific purpose, signs informing people that it is in operation and allowing them to not be captured on it.

- Recording people via a web camera, and the displaying of such images over the internet, is regarded as the processing of personal data. It is imperative that it is done with the consent of those implicated.
- Camera shots of the congregation should be wide shots, minimizing the possibility of easily identifying individuals with close-up images.
- If the church activity being recorded involves children e.g. choir, altar server, their written consent and that of their parents/guardians is required. If this is happening at short notice, for example at a funeral when a child is involved in the liturgy, this should be handled sensitively and by ensuring that parents know the ceremony is live streamed.
- It is imperative that live broadcasts can be terminated quickly to stop transmission in circumstances necessitating it.

A template for receiving this information available in Forms section.

Procedures for Making Complaints and Protected Disclosures

The following procedures provide guidance on what to do when you have concerns about practices that may negatively affect children or young people. If someone is concerned about possible child abuse, this is dealt with under the procedures for responding to abuse.

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.

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 "Responding to Abuse". 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 Forms.

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.