

Child Safeguarding and Protection Policy
of the
Dublin Diocesan Children's Pilgrimage to Lourdes
(DDCPL)
April 2019

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Introduction

The Dublin Diocesan Children's Pilgrimage to Lourdes (DDCPL)

The DDCPL takes a group of children with special needs on a six day pilgrimage to Lourdes every year at Easter. The children are cared for by volunteers chosen and trained for the purpose, who get to know the children before they travel and meet them again at a reunion. The DDCPL aims to provide these children, many of whom experience considerable adversities in their lives, with the opportunity to have fun, excitement and adventure in a safe and caring environment. While in Lourdes the children, along with the adult volunteers, participate in all the activities associated with a pilgrimage, including prayer and participation in the sacraments.

The DDCPL follows the 'One-Church' approach to child safeguarding and protection as set out in *Safeguarding Children: Policy and Standards for the Catholic Church in Ireland (2016)*, prepared and published by the National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI).

Safeguarding Children is set out as seven safeguarding standards:

- Standard 1: Creating and Maintaining Safe Environments,
- Standard 2: Procedures for Responding to Child Protection Suspicions, Concerns, Knowledge or Allegations,
- Standard 3: Care and Support for the Complainant,
- Standard 4: Care and Management of the Respondent,
- Standard 5: Training and Support for Keeping Children Safe,
- Standard 6: Communicating the Church's Safeguarding Message,
- Standard 7: Quality Assuring Compliance with the Standards

This is the child safeguarding and protection policy of the DDCPL. It sets out the arrangements for the implementation of the child safeguarding policy of the Irish Catholic Church for the DDCPL, with particular reference to Standards 1, 2 and 5.

Any situation not anticipated in this document will be dealt with in accordance with the policies and procedures of the Archdiocese of Dublin. For example, an allegation of abuse made against a DDCPL volunteer will be dealt with in accordance with diocesan human resources and volunteer policies (as well as the child protection measures outlined in this document).

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 concerns that a child may have been abused, is being, or is at risk of being abused or neglected. The work of child protection consists of the recognition, 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.

The civil authorities referred to in this document are Tulsa, the Child and Family Agency, and An Garda Síochána.

All of those who work for or on behalf of the DDCPL are required to familiarise themselves with this document and to operate in accordance with its requirements. Information about this policy will be provided to all those who volunteer with the DDCPL as part of their induction and training.

Information about this policy will be made available to the parents of the children who travel to Lourdes with the DDCPL and to those who refer the children.

Section 1

The Child Safeguarding Statement of the Dublin Diocesan Children's Pilgrimage to Lourdes

This statement has been prepared to comply with the requirements of the *Children First Act 2015*.

1.1 Statement

The Dublin Diocesan Children's Pilgrimage to Lourdes (DDCPL), recognises and upholds the dignity and rights of all children, is committed to ensuring their safety and well-being and will work in partnership with parents/ guardians to do this.

The DDCPL recognises each child as a gift from God, and values and encourages the participation of children in all activities that enhance their spiritual, physical, emotional, intellectual and social development.

All those who work for and on behalf of the DDCPL 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.

1.2 Nature of service and principles to safeguard children from harm

The DDCPL takes a group of children on a six day pilgrimage to Lourdes every year at Easter. The children are cared for by volunteers chosen and trained for the purpose, who get to know the children before they travel and meet them again at a reunion. The DDCPL aims to provide these children, many of whom experience considerable adversities in their lives, with the opportunity to have fun, excitement and adventure in a safe and caring environment. While in Lourdes the children, along with the adult volunteers, participate in all the activities associated with a pilgrimage, including prayer and participation in the sacraments.

Safeguarding principles

The DDCPL follows the safeguarding principles of the Archdiocese of Dublin as it endeavours to provide an environment for children that is welcoming, nurturing and safe by:

- Adopting a child centred approach;
- Obtaining parental/guardian permission for the participation of children in the Pilgrimage and associated activities;
- Choosing carefully those who accompany the children to Lourdes for the Pilgrimage;
- Ensuring that those who accompany the children on the Pilgrimage behave appropriately;
- Encouraging positive behaviour among the children and adopting strategies to prevent bullying;
- Making proper arrangements when organising the Pilgrimage;
- Communicating appropriately with the children;
- Keeping good records.

1.3 Risk Assessment

DDCPL has carried out an assessment of the potential for harm to children through their involvement in the Pilgrimage. The following lists the identified risks and the policies, practices and procedures in place for managing these risks.

Risk Identified	Practices and procedures in place to manage identified risk (detailed in the rest of this document)
1. Children could be exposed through their involvement in DDCPL activities to people who may harm them	<ul style="list-style-type: none"> • Safe selection and recruitment procedures for all working with DDCPL, including Garda vetting
2. Those who work with children could engage in unsafe work practices or behave inappropriately towards the children	<ul style="list-style-type: none"> • DDCPL Code of Practice • Complaints procedures • Appropriate communication with children (including use of social media)
3. Those working with children could operate in unsafe environments	<ul style="list-style-type: none"> • Proper arrangements are made for the children involved in DDCPL activities
4. Lack of clarity as to who is responsible for what when it comes to child safeguarding and protection in DDCPL	<ul style="list-style-type: none"> • Roles and responsibilities are clearly laid out in Section 2 of this document • Training, information and advice are provided by diocesan Child Safeguarding and Protection Service (CSPS)
5. Children involved in DDCPL activities may not understand what is expected of them in terms of their contact with and behaviour towards each other	<ul style="list-style-type: none"> • Adults who work with the children are expected to provide good role models for them • Code of Behaviour for Children • Anti-bullying strategies
6. Concerns that a child may have been, is being or is at risk of being abused or neglected may go undetected and unreported	<ul style="list-style-type: none"> • Three designated child protection officers accompany the Pilgrimage • Safeguarding information, training and advice provided by CSPS
7. DDCPL personnel, whether mandated persons or others, may be unaware of their responsibility, or not supported, to report concerns that a child may have been, is being or is at risk of being abused or neglected	<ul style="list-style-type: none"> • Reporting thresholds and procedures are set out in Section 5 of this document and covered in training and information sessions • CSPS available to provide advice, guidance and support • Joint reports will be made by diocesan DLP/ deputy DLP and Mandated Persons, where appropriate, taking account of data protection requirements
8. Mandated persons may not be aware of their responsibilities under the Children First Act 2015	<ul style="list-style-type: none"> • Role of mandated person described in this document • Training and information sessions provided • List of mandated persons will be compiled and kept updated

1.4 Child Protection Procedures

The DDCPL follows the reporting procedures of the Archdiocese of Dublin. The Archdiocese of Dublin promptly reports all concerns that a child may have been, is being or is at risk of being abused or neglected in accordance with procedures developed in line with the requirements of the:

- *Children First Act 2015,*
- *Children First: National Guidance for the Protection and Welfare of Children 2017,*
- *Child Safeguarding: A Guide for Policy, Procedure and Practice,*
- *Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012.*

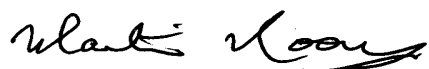
A copy of this Child Safeguarding Statement is available on request.

1.5 Implementation

The DDCPL is committed to the implementation of this Child Safeguard Statement and the practices and procedures that support our commitment to keeping children safe from harm while participating in the annual Pilgrimage to Lourdes and the activities associated with the Pilgrimage.

This Child Safeguarding Statement will be reviewed in February 2021 or as soon as practicable after there has been a material change in any matter to which the statement refers.

Signed: this 15th day of April 2019



Fr. Martin Noone
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Section 2

The Safeguarding Structure of DDCPL

Fr. Martin Noone, Director of the Dublin Diocesan Pilgrimage to Lourdes, has overall responsibility for the safeguarding arrangements of the DDCPL. The Director is informed of any child protection concern that comes to light in any part of the organisation. The Director reports to Diarmuid Martin, Archbishop of Dublin, and alerts him, as appropriate, to any issues of concern.

Olivia Dobbs, Chairperson of the DDCPL, has operational responsibility for the Pilgrimage and is one of three designated Child Protection Officers. The others are Dr Karen Palmer and Geraldine Molloy. They travel to Lourdes each year, oversee the safeguarding arrangements and the Chairperson reports any child protection concerns to the Director and the DLP in accordance with the procedures set out in Section 5 of this document.

Andrew Fagan, Director of the Child Safeguarding and Protection Service of the Archdiocese of Dublin, and Julie McCullough, diocesan Child Protection Officer, are the Designated Liaison Persons (DLPs) for receipt of child protection concerns within the organisation and for reporting them to the civil authorities as required under *Children First: National Guidance for the Protection and Welfare of Children (2017)* and the *Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act, 2012*. They are additionally responsible for reporting concerns relating to a cleric or religious to the National Board for Safeguarding Children in the Catholic Church in Ireland in accordance with Standard 2 of *Safeguarding Children: Policy and Standards for the Catholic Church in Ireland (2016)*.

The DLP:

- acts as liaison with outside agencies and as a resource person to any member of the team who has child protection concerns,
- is responsible for ensuring that the reporting procedure (Section 5) is followed,
- is knowledgeable about child protection and has experience of safeguarding in a Church context,
- assists those who are designated as mandated persons under the Children First Act, 2015 to discharge their responsibilities under the Act¹. The role of the mandated person is discussed in further detail in Section 5.

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

- undergo Garda vetting,
- acquaint themselves with this policy,
- behave in accordance with the Code of Practice for volunteers,
- attend safeguarding training,
- report any concerns that they have for the protection and welfare of children attending the Pilgrimage.

¹ Certain classes of persons, including priests, are mandated under the Children First Act 2015 to report child protection concerns where the child's health, development or welfare have been or are being seriously affected or are likely to be seriously affected. The mandated person's responsibility to report such concerns cannot be discharged on his or her behalf by the DLP but reports can, in certain circumstances, be made jointly by the mandated person and the DLP.

Section 3

The Creation and Maintenance of Safe Environments for Children

This section of the document sets out the practices to be followed to ensure that children who participate in the DDCPL are cared for safely. It is designed to provide guidance to the DDCPL volunteers in their dealings with others, including other DDCPL volunteers. DDCPL volunteers are required to behave appropriately towards the children who participate in the Pilgrimage but also to provide good role models for the children. Therefore, their behaviour towards each other is also very important.

3.1 Code of Conduct for DDCPL volunteers

It is neither possible nor desirable to prescribe how DDCPL volunteers should behave in every given situation. They are expected at all times to operate in accordance with the values and principles set out in Section 1.2 of this document. This code of conduct provides more specific guidance. Nonetheless, not every situation can be anticipated and people will be required to use their judgment in interpreting and applying these values and guidelines.

DDCPL volunteers should always be mindful of the requirement to be accountable and transparent in their dealings with others. Accountability, in this context, means being willing to give an account and explanation of their actions, including their reasons for choosing to do things in a particular way rather than in any of the available alternative ways. Transparency is about operating in safe environments, ones where there is openness and visibility. A culture of safeguarding obtains when accountability and transparency operate horizontally and as well as vertically. In other words, members of teams are accountable to each other, not just to the person in charge.

Those working for or on behalf of the DDCPL commit to:

- treating all people with justice, courtesy and respect;
- encouraging every person to contribute to the DDCPL in accordance with their wishes and abilities;
- listening to and demonstrating respect for the views of all people, taking account of their particular background and experiences;
- respecting each person's personal boundaries;
- encouraging people to speak openly about anything that may be worrying them;
- operating in accordance with this policy and Church and national guidelines;
- challenging and reporting abusive or potentially abusive behaviour;
- maintaining confidentiality with respect to sensitive information;
- working cooperatively with colleagues.

Those working for or on behalf of DDCPL will not:

- engage in any form of bullying or harassment²;
- have any sexual contact with a child;

² Harassment is defined as encompassing a "broad range of behaviours, including but not limited to physical, verbal, written or psychological abuse, bullying, racial and religious insults, derogatory ethnic slurs, sexual jokes and comments, requests for sexual favours, display of pornographic materials. Harassment can occur as a result of a single incident or pattern of behaviour where the purpose or effect is to create a hostile, offensive, humiliating or intimidating environment" (*Standards and Guidelines for Priestly Life and Ministry*, Archdiocese of Dublin, 2015).

- physically chastise a child;
- develop a relationship with a particular child that is exclusive of others;
- place a child at risk;
- do things of a personal nature for a child or that he or she can do for him/herself;
- ask a child to keep a secret;
- condone or fail to challenge unacceptable behaviour;
- discriminate against any individual or group;
- engage in 'horse play' with a child;
- present for duty under the influence of alcohol or illegal substances.

3.2 Listening with care, responding with sensitivity

Even when people are doing their best, things can and do go wrong. Within any group spending a lot of time together miscommunications and misunderstandings are bound to occur. It is important to have simple and effective ways of putting them right.

Children generally send out signals when they are unhappy about something. They respond positively when these signals are recognised as expressions of unhappiness and steps are taken to put things right. There is a responsibility on those working with the DDCPL to be alert to expressions of unhappiness (which may be non-verbal) and to respond appropriately. Such a response could be as simple as asking the child if everything is okay with him or her.

Such matters are best addressed as close as possible to the source of the problem. For example, if a volunteer inadvertently does something to upset a child an immediate and sincere verbal apology is often the most appropriate response.

Where a matter cannot be resolved in this simple and direct manner, another volunteer may be able to assist in bringing about resolution through negotiation and mediation. Such an intervention can be effective where a misunderstanding has arisen between those involved.

Where it has not proved possible to resolve an issue by these means the matter should be reported to the Chairperson. A note should be made of what has occurred, the people involved (including their contact details) and the outstanding issues. Given the nature of the Pilgrimage, it may happen that complaints are made after the Pilgrimage is over, by parents for example. The Chairperson, in consultation with senior personnel, will decide on the appropriate response and inform the Director of the process and its outcome.

A complaint may relate to alleged abuse or unacceptable conduct by a volunteer. In such situations disciplinary or child protection procedures may apply. Where such procedures are invoked they are additional to and not a substitute for attempts to resolve the unhappiness or dissatisfaction of the complainant.

3.3 Whistleblowing policy

The purpose of this policy is to encourage those who have concerns for the welfare or safety of children participating in the DDCPL to express their concerns without the fear that they will be victimised or harassed for so doing. The policy applies to all volunteers.

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 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 the DDCPL for the protection 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.

The DDCPL is committed to ensuring that any person who raises a concern for the protection or welfare of any person 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.

Where the concern relates to a child it should be first reported to one of the Child Protection Officers. 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 one of the Child Protection Officers 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 Director.

3.4 Making proper arrangements for children

Selection of children:

- Children are nominated for participation in the DDCPL by parents, teachers, school principals and social workers;
- The applications are considered by the Chairperson, Chief Medical Officer, Chief Nurse and senior volunteers who select the children to travel to Lourdes;
- The parents or guardians are given full information about the Pilgrimage and any activities before and after it;
- The consent of the parents or guardians is sought and confirmed in writing;
- Information is obtained on any medical or dietary issues and/ or requirements and the contact details of the parents or guardians are also obtained;
- The children's consent is also obtained in a manner consistent with their age and understanding;
- Each child is allocated to a group, colour coded red, green or blue.

Selection and deployment of volunteers:

- Volunteers are carefully selected, two references are sought and they are vetted by the National Vetting Bureau through the diocesan vetting office;
- Volunteers receive training in child care, the care of children with special needs and child safeguarding;
- Volunteers work alongside their colleagues and never alone and this includes bringing children to and from DDCPL activities;
- The team of volunteers is gender balanced to ensure that the children receive the care of both male and female volunteers;

In Lourdes:

- The hotel and facilities used in Lourdes are checked to ensure that they are safe for the children, taking account of their particular needs;
- Any areas found to be unsafe are deemed 'out of bounds' for the children and the volunteers endeavour to keep the children away from them;
- No child is left behind by the group because he or she is slower than the rest;
- Any behavioural difficulties on the part of children are dealt with in accordance with the Code of Practice for volunteers. Every child is treated fairly and with respect and is never humiliated or physically chastised;
- There is a code of behaviour for the children to help them manage their own behaviour and ensure that they are respectful in their dealings with each other and with the volunteers;

At night:

- Those children who require it for their own care and safety sleep in shared rooms and this is agreed with their parents or guardians before they travel to Lourdes;
- Volunteers provide supervision up until 1.30am or until all of the children are asleep.

Particular situations:

- Volunteers exercise particular care when supervising the children getting on and off buses, in swimming pools and crossing roads;
- First aid and medical care is administered by doctors and nurses;
- Accidents and incidents are reported in writing to the Chairperson or one of the Child Protection Officers;
- Where a child needs assistance with personal care, the child's wishes in relation to how this is to be provided are sought;
- A note on physical contact with children: Children often seek and need physical reassurance from adults and this should not be denied to them. However, such contact should be a response to the child's need, not that of the volunteer. It is best provided in situations where those involved are visible to others.

3.5 Communicating with children

Those who work for and on behalf of the DDCPL 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. Volunteers should not use any of these media to initiate or maintain personal relationships with the children. In particular, they must not:

- provide a child with their own personal mobile phone number or email address;
- befriend a child on a social media website such as Facebook;
- take photographs of children without obtaining their permission, that of their parents or guardians and of DDCPL;
- communicate with a child by email.

Section 4

Definition of Child Abuse

Child abuse occurs when the behaviour of someone in a position of greater power than a child abuses that power and causes harm to the child. The common denominator of all child abuse is that it makes children feel diminished or threatened, and that it causes them harm. All forms of child abuse perpetrated by an adult on a child constitute a betrayal of trust and an abuse of power by the adult.

The abuse of children is generally categorised under four headings:

- **physical abuse,**
- **emotional abuse,**
- **sexual abuse and**
- **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.

The following definitions are taken from *Children First: National Guidance for the Protection and Welfare of Children*, Department of Children and Youth Affairs, 2017.

Physical abuse

Physical abuse is when someone deliberately hurts a child physically or puts them at risk of being physically hurt. There may be single or repeated incidents.

Emotional abuse

Emotional abuse is the systematic emotional or psychological ill treatment of a child as part of the overall relationship between a care giver and a child. It occurs when a child's developmental need for affection, approval, consistency and security are not met, due to incapacity or indifference from their parent/ guardian or care giver.

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.

Neglect

Neglect occurs when a child does not receive adequate care or supervision to the extent that the child is harmed physically or developmentally.

Children with additional vulnerabilities

Some children are more vulnerable to abuse than others. They include children who are homeless, children with disabilities, children who, for whatever reason, are separated from their parents or guardians and families and are dependent on others for their care and protection. Particular attention needs to be paid to the protection and welfare of such children.

Peer Abuse

Children can also be abused by peers. A particularly pernicious form of peer abuse is bullying, including cyberbullying. In such situations there are important child protection issues in relation to both children (victim and perpetrator) and the civil authorities need to be notified in relation to each of the children involved.

Section 5

Dealing with Child Protection Concerns

Given that the DDCPL takes place outside of Ireland, any child protection matter that arises during the Pilgrimage will be dealt with, in the first instance, by the Child Protection Officers in consultation with the Director. The DLP is available for telephone consultation if required.

All concerns for the protection and welfare of a child participating in the DDCPL must be reported to the DLP at the first available opportunity who:

- conducts such preliminary enquiries as are required under *Children First* to determine whether the concern reaches the threshold for reporting to the civil authorities,
- where the threshold for reporting has been reached, reports the concern without delay to Tusla, the Child and Family Agency and, in certain circumstances, to An Garda Síochána,
- informs the parent/s or guardians of the child/ren concerned (or ensures that they are informed) that a report has been made unless to do so places the child/ren at risk,
- considers whether there are implications for the safety of other children attending DDCPL and, if so, takes appropriate protective measures,
- liaises with Tusla and, as appropriate, An Garda Síochána, and assists with any assessment or investigation,
- informs the National Board for Safeguarding Children in the Catholic Church in Ireland where the concern relates to a cleric or religious.

Reasonable grounds for concern

Children First states that:

- Tusla, the Child and Family Agency, should 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” (Chapter 2) using the required form (available from <http://www.tusla.ie/children-first/publications-and-forms#SRP>),
- Reports should be supported by evidence that indicates the possibility of abuse or neglect,
- A concern about a *potential risk* to children posed by a specific person, even if the children are unidentifiable, should also be reported.

The DLP determines whether reasonable grounds exist for reporting to Tusla. If there is any doubt as to whether the threshold for reporting under *Children First* has been reached, the advice of Tusla will be sought and followed.

It should be noted that concerns for the protection and welfare of children participating in the DDCPL may arise in different ways. They may arise within the context of DDCPL activities, as in a situation where the behaviour of a volunteer towards a child appears to be inappropriate. They may also arise in the context of a disclosure of abuse by a child. More likely to occur are situations where children present with unusual injuries or appear distressed and the possibility of abuse arises. All of these situations must be reported to the DLP who will determine what action to take.

Information that a person has committed a serious offence (a physical or a sexual assault) against a child must be reported to An Garda Siochana as well as to Tusla.

Concerns not reported

Where a DDCPL volunteer reports a child protection concern to the DLP and the DLP determines that the threshold for reporting to the civil authorities has not been reached, the DLP will inform the person of this and give reasons in writing. The person is then at liberty to take the concern directly to the civil authorities.

Mandatory Reporting

From 11 December 2017 people holding certain positions ('mandated persons') are required by law in the Republic of Ireland to report to Tusla where he or she: "knows, believes or has reasonable grounds to suspect that a child is being harmed, has been harmed or is at risk of being harmed". Mandated persons may also be required to assist Tusla in the assessment of such concerns.

Included in the definition of mandated persons are members of the clergy, Church pastoral workers and safeguarding or child protection officers employed by a religious body or organisation. Doctors, nurses, teachers, social workers and other professionals are also mandated persons. However, the legal obligation to report under the *Children First Act 2015* applies only to information acquired in the course of the mandated person's professional work or employment. So, those doctors and nurses who travel with the Pilgrimage as doctors and nurses are mandated persons but teachers and other professionals who travel as helpers are not.

The threshold for mandated reports is different from other reporting under *Children First*. In addition, there are data protection considerations to be taken into account when dealing with child protection concerns that do not relate to the DDCPL, for example, in a situation where a child discloses abuse within a family context. In these situations the mandated person should report to the DLP, as described above, who will offer advice and assist the mandated person to discharge their legal responsibilities.

Appendix 1

Signs and Symptoms of Child Abuse

(Taken from *Children First: National Guidance for the Protection and Welfare of Children, 2017*)

Neglect should be suspected in cases of:

- children being left alone without adequate care or supervision,
- malnourishment, lacking food, unsuitable food or erratic feeding,
- 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,
- non-organic failure to thrive, that is, a child not gaining weight, due not only to malnutrition but also due to emotional deprivation,
- failure to provide adequate care for a child's medical and developmental needs including intellectual stimulation,
- inadequate living conditions – unhygienic conditions, environmental issues , including lack of adequate heating and furniture,
- abandonment or desertion.

The following may be signs of **emotional abuse**, though no one indicator should be regarded as conclusive:

- rejection,
- continuous lack of praise and encouragement,
- lack of love and comfort,
- lack of attachment,
- lack of proper stimulation (for example, fun and play),
- lack of continuity of care (for example, frequent moves),
- serious over-protectiveness,
- inappropriate non-physical punishments (for example, locking in bedrooms),
- family conflicts and/ or violence,
- inappropriate expectations of a child's behaviour relative to his or her age and stage of development,
- every child who is neglected, physically or sexually abused is also emotionally abused.

Physical abuse should be suspected where any of the following occur with unusual frequency or where there are varying or unsatisfactory explanations for:

- bruises,
- fractures,
- swollen joints,
- burns or scalds,
- abrasions or lacerations,
- haemorrhages (retinal, subdural),
- damage to body organs,
- poisonings – repeated (prescribed drugs, alcohol),
- failure to thrive,
- coma or unconsciousness,
- death.

Skin, mouth and bone injuries are the most common forms of physical abuse.

The following physical and behavioural signs may indicate **sexual abuse**:

- bleeding from the vagina or anus,
- difficulty in passing urine or faeces,
- sexually transmitted infections,
- noticeable and uncharacteristic change of behaviour,
- hints about sexual activity,
- age-inappropriate understanding of sexual behaviour,
- inappropriate seductive behaviour,
- sexually aggressive behaviour with others,
- uncharacteristic sexual play with peers or toys,
- unusual reluctance to join in normal activities that involve undressing (for example, games or swimming).

There are also some age related signs and symptoms of sexual abuse. Bedwetting, school refusal and separation anxiety in younger children can be associated with sexual abuse. Eating disorders, self-harm, substance abuse and running away may indicate sexual abuse of older children and adolescents.

Appendix 2

Responding to a disclosure of child abuse

These guidelines were originally developed by Barnardos in 2011. Following disclosure, the reporting procedure, as set out in Section 5, must be followed.

If a child 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 suggestions 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 Appendix 3).

Appendix 3

Confidentiality, Data Protection and Record Keeping

The DDCPL 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 Church and 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 DDCPL 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 right 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. Up until now DDCPL has complied with the Data Protection Acts 1988 & 2003. From May 2018 DDCPL complies with the new General Data Protection Regulation (GDPR) whose principles include;

- a) **Lawful, Fair and Transparent processing**
- b) **Specified and Lawful Purpose**
- c) **Data Minimisation**
- d) **Accuracy**
- e) **Storage Limitation**
- f) **Security, Integrity and Confidentiality**
- g) **Liability and Accountability**

The records of the DDCPL that contain personal information are stored in secure, locked fireproof cabinets in Holy Cross Diocesan Centre and can only be accessed by DDCPL

personnel. Computer records are password protected and encrypted. Those accessing computer records are required to log on to diocesan computers using their own personalised password. The Director and Chairperson have access to these records and only they can authorise other people to access them.

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 DDCPL holds personal data are entitled to it subject to limited exceptions. Applications to obtain such personal data should be made to the Director in writing accompanied by proof of identity. There is no charge for this.