

## Document Control

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### Policy Origins

New	Legacy
	X

### Revision History

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1.0	September 2020	Infant Mental Health Specialist	New
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1.04	May 2025	Cork Child Friendly City Development Worker, Infant Mental Health and Wellbeing Co-ordinator, Executive Director	To take into account scope of work, Cork Child Friendly Cities, and Kidscope Clinic

### Approvals

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**Next review date: May 2026**

# Child Safeguarding Policy

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## Preamble

Let's Grow Together! Infant & Childhood Partnerships CLG

Please note that these guidelines were drafted in line with *Children First, National Guidance for the Protection and Welfare of Children 2017* and *Children First Act 2015*.

This policy must be taken together and due regard for: Child Safeguarding Statement, Health and Safety Statement, Risk Management Policy, Data Protection Policy & Procedures, Data Retention & Erasure Policy, confidentiality, staff recruitment. This is not an exhaustive list.

Let's Grow Together's Child Safeguarding Policy complies with national policy, current legislation and guidance (Tusla's *Children First: National Guidance for the Protection and Welfare of Children and Child Safeguarding: A guide for policy, procedure and practice 2<sup>nd</sup> Edition 2019*). Let's Grow Together's Child Safeguarding Policy outlines our duty to ensure the safety and well-being of all children engaged with and known to our service.

Who must adhere to the Policy?

- Governance Structures
- Managers
- Staff
- Students
- Volunteers

All of the above listed will abide by their requirements and intent in respect of safeguarding children and young people in accordance with this Policy.

Let's Grow Together will review its guiding principles and child safeguarding procedures yearly, or sooner if necessary due to service issues or changes in legislation or national policy.

The policies and procedures in this document have been designed so that their implementation will protect both young people and staff and allow everyone to focus on quality of engagement, participation and creativity.

Let's Grow Together have implemented procedures on:

- Welfare and Child Protection;
- Health and Safety;
- Code of Behaviour for All Staff;
- Reporting of Suspected or Disclosed Abuse;
- Data Protection and Confidentiality;
- Recruitment and Selection of Staff;
- Management and Supervision of Staff;
- Involvement of Primary Carers;
- Allegations of Misconduct or Abuse by Staff;
- Complaints and Comments;
- Incidents and Accidents;

## Section 1. Declaration of Guiding Principles

Let's Grow Together provides area based prevention and early intervention programmes with both group and one to one approaches and carries out its work in Let's Grow Together premises, homes, local community and local service settings. Let's Grow Together also supports the following initiatives which provide services/activities to children, young people and their families and operate under Let's Grow Together policies and procedures:

- Kidscope Paediatric Clinic – Administrative Co-ordinator
- Cork Child Friendly City – Development Work

Let's Grow Together believes that the best interests of children and young people attending its programmes are paramount. Let's Grow Together is committed to protecting and promoting the rights of children and young people accessing the services, including their right to be protected, treated with respect, listened to and to have their own views taken into consideration in all decisions affecting them.

Let's Grow Together's guiding principles are underpinned by *Children First; National Guidance for the Protection and Welfare of Children*, *Tusla's Child Safeguarding: A Guide for Policy, Procedure and Practice 2<sup>nd</sup> Edition 2019*, the *United Nations Convention on the Rights of the Child* and current legislation such as the *Children First Act 2015*, *Child Care Act 1991*, *Protections for Persons Reporting Child Abuse Act 1998* and the *National Vetting Bureau Act 2012*.

These guiding principles apply to all paid staff team members, volunteers, Committee/Board members and students on placement within the organisation. All paid staff team members, volunteers, Committee/Board members and students must sign up to and abide by these guiding principles and safeguarding procedures.

The guiding principles and child safeguarding procedures will be reviewed yearly or sooner if necessary due to service issues or changes in legislation or national policy.

Designated Liaison Person is Trish Hurley

Contact details: 086 185 4977

Deputy Designated Liaison Persons are Suzanne Rigby 086 814 2190, Cliona Twohig 086 078 6557

## Section 2. Child Safeguarding Statement

In accordance with the *Children First Act 2015*, Lets Grow Together has conducted a risk assessment of our services for children and young people. The risk assessment is included in our Child Safeguarding Statement which has also been created in accordance with the act.

Let's Grow Together's Child Safeguarding Statement details how we meet our obligations under the *Children First Act 2015*. We circulate it to all staff and volunteers and it is displayed publicly in the building. A copy of our Child Safeguarding Statement can be made available to parents, guardians and carers on request. The Child Safeguarding Statement is also available to Tusla as required.

We will review our Child Safeguarding Statement every year or sooner if there is a material change in any of the issues to which it refers.

### Child Safeguarding Safety Statement

Let's Grow Together! Infant and Childhood Partnerships CLG

#### 1. Commitment to Safety and Wellbeing

Let's Grow Together is dedicated to:

- Providing a physically and emotionally safe space for children, families, and staff;
- Ensuring all interventions are child-centred, trauma-informed, and developmentally appropriate;
- Upholding the rights of every child to protection, participation, and inclusion;
- Promoting respectful relationships and safeguarding practices in every aspect of our work.

#### 2. Responsibilities

Management:

- Maintain compliance with all health and safety legislation;
- Conduct regular risk assessments and safety audits;
- Ensure staff training in first aid, child protection, and inclusive practice;
- Appoint a Health & Safety Officer and a Designated Liaison Person (DLP) for child safeguarding.

Staff:

- Follow all health, safety, and safeguarding procedures;
- Participate in continuous professional development;
- Support children in a respectful, responsive, and developmentally supportive manner.

Families:

- Share relevant information to support their child's development and safety;
- Engage in collaborative planning with staff and allied health professionals.

#### 3. Health and Safety Statement

Let's Grow Together! Infant & Childhood Partnerships CLG recognises that it has responsibilities under the *Safety, Health and Welfare at Work Act 2005*, the *Safety, Health & Welfare at Work (General Applications) Regulations 2007 to 2023* (as amended) for the health, safety and welfare of our employees, the children in our care, contractors working for us and for anyone else whose health and safety could be affected by our work activity. We will assess the hazards and risks they face and take action to minimise hazards and control risks to an acceptable, tolerable level. Our managers and

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supervisors are made aware of their responsibilities and required to take all reasonable precautions to ensure the safety, health and welfare of our workforce, children in our care and anyone else. We will meet our legal obligations by providing and maintaining a safe and healthy working environment so far as is reasonably practicable. This will be achieved by:

- Providing leadership and control of identifiable health and safety risks on our premises and at every worksite;
- Consulting with our employees on matters affecting their health and safety and that of the children in our care;
- Ensuring that our premises are secure and that safeguarding checks are made for each member of our workforce;
- Providing and maintaining safe, suitable buildings and equipment;
- Ensuring the safe handling and use of substances;
- Providing information, instruction, and training where necessary for our workforce, considering those who do not have English as a first language;
- Ensuring that all employees and contractors are competent to do their work, and where appropriate, giving them suitable training;
- Preventing accidents and cases of work-related ill health;
- Actively managing and supervising health and safety at work;
- The careful organisation, assessment and mitigation of hazards and risks for off-site activities with a separate consideration and approval process;
- Having access to competent advice;
- Aiming for continuous improvement in health and safety performance and management by regularly reviewing and revising this policy;
- The provision of the resources, financial and other, required to make this policy and our health and safety arrangements effective.

We also recognise our duty to co-operate and work with other employers and workers when they come onto our premises, to ensure the health and safety of everyone at work.

To help achieve our objectives and ensure our employees recognise their duties under health and safety legislation, we will also remind them of their duty to take reasonable care for themselves and for others. These duties are explained on first employment, at induction. A Safety Handbook, setting out their duties and specific health and safety rules, is given to each employee.

Signature ..... Date .....

Position .....

Please refer to The Let's Grow Together Health and Safety Policy for a full outline of the Risk Assessment and Safety Measures that are currently in place.

Please refer to The Child Safeguarding Safety Statement specifically in relation to this Safeguarding policy.

#### **4. Emergency Preparedness**

We have protocols in place for:

- Fire safety and emergency evacuations (including children with mobility or sensory needs);
- First aid response and injury management;
- Communication with parents/guardians in emergency situations;
- Critical incident planning.

#### **5. Review and Evaluation**

This Safety Statement is reviewed annually or in response to:

- Legislative or regulatory changes;
- Significant incidents;
- Changes in our service delivery.

Reviews include consultation with staff, parents/guardians, and—where appropriate—external professionals.

## Section 3. Code of Behaviour for All Staff and Volunteers

### Key Roles in Safeguarding

#### Designated Liaison Persons (DLP):

The DLP is responsible for leading the development of guiding principles and child safeguarding procedures and for ensuring that policies and procedures are consistent with best practice. They should liaise with all key workers and volunteers who have relevant roles and responsibilities.

The named person can also assist with the review process.

Appointed DLP: Trish Hurley

This person will liaise with statutory agencies responsible for child protection and welfare and will be the resource person to any worker or volunteer who has child protection concerns.

Appointed Deputy DLP: Suzanne Rigby/Cliona Twohig

In the event that the DLP is not available (e.g. due to annual leave, sick leave, etc.), a Deputy DLP should be delegated responsibility. Contact details for the DLP and Deputy DLPs should be displayed.

#### Roles and responsibilities of DLP/Deputy DLP:

- Be fully familiar with Let's Grow Together duties in relation to the safeguarding of children;
- Have good knowledge of the guiding principles and child safeguarding procedures;
- Ensure that the organisation's reporting procedure is followed, so that child protection and welfare concerns are referred promptly to Tusla;
- Receive child protection and welfare concerns from workers and volunteers and consider if reasonable grounds for reporting to Tusla exist;
- Consult informally with a Tusla Duty Social Worker if necessary;
- Where appropriate, make a formal report of a child protection or welfare concern to Tusla on behalf of their organisation, using the Child Protection and Welfare Report Form;
- Inform the child's parents/guardians that a report is to be submitted to Tusla or An Garda Síochána, unless:
  - Informing the parents/guardians is likely to endanger the child or young person;
  - Informing the parents/guardians may place you as the reporter at risk of harm from the family;
  - The family's knowledge of the report could impair Tusla's ability to carry out an assessment
- Record all concerns or allegations of child abuse brought to your attention as well as any action/inaction taken in response to these concerns;
- Provide feedback to the referrer, as appropriate;
- Ensure that a secure system is in place to manage confidential records;
- Act as a liaison with Tusla and An Garda Síochána, as appropriate;
- Where requested, jointly report with a mandated person;
- Maintain the internal Register of Reports.

#### Mandated persons:

The *Children First Act 2015* contains a list of classes of mandated persons.

Under the *Children First Act 2015*, mandated persons have a statutory obligation to report concerns which meet or exceed a particular threshold and to cooperate with Tusla in the assessment of

mandated reports, where requested to do so. List of mandated persons in Let's Grow Together: Trish Hurley, Tracy Lane, Grace Walsh, Jennifer Harte, Suzanne Rigby.

Workers who are mandated persons are made aware of their responsibilities under the legislation at commencement of their employment. Mandated persons may make joint reports with the DLP in their organisation; however, a mandated person cannot discharge their statutory responsibility to report by reporting to another person (e.g. by reporting to the DLP).

All workers and volunteers (including students on placement or work experience) have a responsibility to safeguard children and young people and to report any concerns they may have for the protection or welfare of a child/young person.

*Children First: National Guidance for the Protection and Welfare of Children* refers to the role of the DLP and Deputy DLP. In accordance with best practice in child safeguarding Let's Grow Together appointed Trish Hurley as DLP to be the resource person to any team member or volunteer who has child protection concerns and to liaise with outside agencies. The role of the DLP is to receive child protection and welfare concerns from workers/volunteers and to report concerns which meet the threshold of 'reasonable grounds for concern' to Tusla.

Under the *Children First Act 2015* mandated persons have a statutory obligation to report concerns which reach or exceed a legally defined threshold (see section 14 of the *Children First Act 2015*) and to cooperate with Tusla in the assessment of mandated reports, where requested to do so.

A Code of Behaviour when working with Children and Young People for staff is an essential element of our Child Protection Policy and is embedded in the core values of Let's Grow Together. It is not designed to create difficulties for staff or impediments to working with children and young people but rather to create a safe working environment for both staff and the children and young people we work with.

This must be read and implemented by all members of staff and volunteers.

## Code of Behaviour

The Code of Behaviour when working with Children and Young People can be categorised under the following headings:

- A. Commitment to a child-centred approach;
- B. Good practice;
- C. Categories and Indicators of Abuse;
- D. Inappropriate Behaviour and Guidance on Physical Contact;
- E. Responding to Concerns;
- F. Confidentiality;

All details of practices and procedures under those headings will be found on the following pages. Specific codes of behaviour which relate to different facets of the organisation – Kidscope and Cork Child Friendly Cities– are included in Section 5. Staff must ensure that they are familiar with all the policies and procedures which apply to all staff and to their relevant section in particular.

Members of Staff will be required to sign the document stating familiarity with all relevant procedures.

The Code of Behaviour and the Procedures arising from them are designed to protect the children and young people, you the staff and the organisation.

## **A. A Child-Centred Approach**

The Principle of Paramountcy applies to all activities: "...the welfare of the child is of paramount importance." (*Children First: Principles for Best Practice in Child Protection*)

In order to ensure the respect Lets Grow Together's demands towards children and young people staff should:

- Treat all children and young people fairness and equity;
- Listen to and respect children and young people;
- Involve children and young people in decision-making, as appropriate;
- Provide encouragement, support and praise (regardless of ability);
- Use appropriate language (physical and verbal);
- Have fun and encourage a positive atmosphere;
- Offer constructive criticism when needed;
- Treat all children and young people as individuals;
- Respect a child's or young person's personal space;
- Discuss boundaries on behaviour and related sanctions, as appropriate; with children and young people and their primary carers;
- Encourage feedback from group;
- Use age-appropriate teaching aids and materials;
- Lead by example;
- Be cognisant of a child's or young person's limitations, due to a medical condition for example;
- Create an atmosphere of trust;
- Respect differences of ability, culture, religion, race and sexual orientation.

## **B. Good Practice**

In order that the practice of the company reflects the above child-centred approach staff engaging with children and young people should:

- Register each child/young participant with whom we have sustained contact (name, address, phone, email address, special requirements, attendance, emergency contact);
- Make primary carers, children/young people, visitors and volunteers aware of the Child Protection Policy and procedures;
- Have emergency procedures in place and make all staff aware of these procedures;
- Be inclusive of all children and young people;
- Plan and be sufficiently prepared, both mentally and physically;
- Report any concerns to the DLP;
- Follow reporting procedures
- Encourage children and young people to report any bullying, concerns or worries and to be aware of anti-bullying policy;
- Observe appropriate dress and behaviour;
- Report and record any incidents and accidents;
- Where possible, keep primary carers informed of any issues that concern their children;

- Ensure proper supervision based on adequate ratios according to age, abilities and activities involved;
- Encourage an open environment with children;
- Don't be passive in relation to concerns; i.e., don't 'do nothing';
- Don't let a problem get out of control;
- Follow procedure when home visiting and working alone
- Avoid if at all possible, giving a lift to a child/young person and if you do then make sure that primary carers are informed;
- Maintain awareness around language and comments made. If you think that something you said may have caused offense or upset, then try to address it in a sensitive manner.

The organisation is committed to:

- Providing appropriate training for staff and volunteers;
- Updating and reviewing policies and procedures regularly;
- Seeking guidance from relevant authorities, when needed;
- Ensuring clear communication between staff and the schools/organisations with which we work;
- Having guidelines and specific work practices for each area of the company's work;
- Evaluating work practices on a regular basis.

### **C. Categories and Indicators of Abuse**

*Children First: National Guidance for the Protection and Welfare of Children* defines four categories of abuse: neglect, emotional abuse, physical abuse and sexual abuse. A child/young person may be subjected to one or more forms of abuse at any given time.

In the *Children First: National Guidelines*, 'a child' means a person under the age of 18 years, excluding a person who is or has been married.

#### Definition of '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;
- Harm can be defined as the ill-treatment or the impairment of the health or development of a child. Whether it is significant is determined by the child's health and development as compared to that which could reasonably be expected of a child of similar age;
- Neglect generally becomes apparent in different ways over a period of time rather than at one specific point.

The threshold of significant harm is reached when the child's needs are neglected to the extent that his or her well-being and/or development are severely affected.

#### Definition of '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 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.

Examples of emotional abuse of children include:

- The imposition of negative attributes on children, expressed by persistent criticism, sarcasm, hostility or blaming;
- Conditional parenting in which the level of care shown to a child is made contingent on his or her behaviours or actions;
- Emotional unavailability of the child's parent/carer;
- Unresponsiveness of the parent/carer and/or inconsistent or inappropriate expectations of the child;
- Premature imposition of responsibility on the child;
- Unrealistic or inappropriate expectations of the child's capacity to understand something or to behave and control himself or herself in a certain way;
- Under- or over-protection of the child;
- Failure to show interest in, or provide age-appropriate opportunities for, the child's cognitive and emotional development;
- Use of unreasonable or over-harsh disciplinary measures;
- Exposure to domestic violence;
- Exposure to inappropriate or abusive material through new technology.

Emotional abuse can be manifested in terms of the child's behavioural, cognitive, affective or physical functioning. Examples of these include insecure attachment, non-organic failure to thrive, unhappiness, low self-esteem, educational and developmental underachievement, and oppositional behaviour.

The threshold of significant harm is reached when abusive interactions dominate and become typical of the relationship between the child and the parent/carer.

### Definition of 'Physical Abuse'

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

- severe physical punishment;
- beating, slapping, hitting or kicking;
- pushing, shaking or throwing;
- pinching, biting, choking or hair-pulling;
- terrorising with threats;
- observing violence;
- use of excessive force in handling;
- deliberate poisoning;
- suffocation;
- fabricated/induced illness;
- allowing or creating a substantial risk or a significant harm to a child.

## Definition of '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. Examples of child sexual abuse include:

- exposure of the sexual organs or any sexual act intentionally performed in the presence of the child;
- intentional touching or molesting of the body of a child whether by a person or object for the purpose of sexual arousal or gratification;
- masturbation in the presence of the child or the involvement of the child in an act of masturbation;
- sexual intercourse with the child, whether oral, vaginal, or anal;
- sexual exploitation of a child, which includes inciting, encouraging, propositioning, requiring, or permitting a child to solicit for, or to engage in, prostitution or other sexual acts. Sexual exploitation also occurs when a child is involved in the exhibition, modelling or posing for the purpose of sexual arousal, gratification, or sexual act, including its recording (on film, video tape or other media) or the manipulation, for those purposes, of the image by computer or other means. It may also include showing sexually explicit material to children, which is often a feature of the 'grooming' process by perpetrators of abuse;
- consensual sexual activity involving an adult and an underage person.

## Age of consent

In relation to child sexual abuse, it should be noted that, for the purposes of the criminal law, the age of consent to sexual intercourse is 17 years for both boys and girls. An Garda Síochána will deal with the criminal aspects of the case under the relevant legislation.

It should be noted that the definition of child sexual abuse presented in this section is not a legal definition and is not intended to be a description of the criminal offence of sexual assault.

In cases where abuse is not suspected or alleged, but the boy or girl is underage, consultation must be held between the HSE and An Garda Síochána, and all aspects of the case will be examined. Both agencies must acknowledge the sensitivity required in order to facilitate vulnerable young people in availing of all necessary services, while at the same time satisfying relevant legal requirements.

## Peer abuse and bullying

In a situation where child abuse is alleged to have been carried out by another child, the child protection procedures should be adhered to for both the victim *and* the alleged abuser – i.e. it should be considered a childcare and protection issue for *both* children.

Abusive behaviour that is perpetrated by children must be acted upon. If there is any conflict of interest between the welfare of the alleged abuser and the victim, the victim's welfare is of paramount importance.

As in all cases of child abuse, it is essential to respond to the needs of children who are abused by their peers. Each individual case will require its own unique intervention. Appropriate support and services should be provided to the child and his or her parents/carers as quickly as possible. In the case of child sexual abuse by peers, treatment approaches may include individual treatment and/or group therapy for the child or adolescent.

Children who are abusive towards other children also require comprehensive assessment and therapeutic intervention by skilled childcare professionals. Treatment is more likely to be effective if begun early in the child's life. It is known that some adult abusers begin abusing during childhood and adolescence, that significant numbers will have suffered abuse themselves and that the abuse is likely to become progressively more serious. Early referral and intervention are therefore essential.

There is a high probability that future abuse can be prevented if intervention takes place early in the child's life. Therefore, it is essential to refer concerns about peer abuse immediately to the Children and Family Services of the HSE. The HSE should establish appropriate treatment programmes to cater for children who engage in abusive behaviour with other children.

It should be anticipated that an allegation of peer abuse will have a detrimental impact on relationships between the alleged abuser, his or her parents/carers and other family members. A negative impact on other social relationships, such as with peers and neighbours, should also be anticipated. As a result, the child and family may experience isolation, and in some situations victimisation, following an allegation of abuse.

The child's parents/carers will need support and advice to help them understand the abusive behaviour and to deal with the situation. Active participation and commitment by parents/carers can be an important factor in the success of treatment and may be crucial in influencing the general outcome of the case. It is therefore essential to provide adequate support services to the child and family throughout the assessment and treatment processes.

### Sexual abuse by children and young people

Research shows that teenagers perpetrate a considerable proportion of child sexual abuse. Such cases should be referred to the Children and Family Services of the HSE. It is important that the different types of behaviour are clearly identified, and that no young person is wrongly labelled 'a child abuser' without a clear analysis of the particular behaviour. Four categories of behaviour warrant attention: normal sexual exploration, abuse reactive behaviour, sexually obsessive behaviour and abusive behaviour by adolescents and young people.

#### Normal sexual exploration

This could consist of naive play between two children that involves the exploration of their sexuality. This type of behaviour may be prompted by exchanges between children, such as 'You show me yours and I'll show you mine'. One of the key aspects of this behaviour is its tone: there should not be any coercive or dominating aspects to this behaviour. Usually, there is no need for child protection intervention of any kind in this type of situation.

In the first few years of life, children show interest in their own, as well as others', "private" areas. Many babies discover their genitals and touch them, from infancy forward. This behaviour can be ignored (because it is quite normal). Masturbation and curiosity about genitals are both perfectly normal in young children. But there is a point when this normal and typical activity can raise a concern.

Seek advice from your DLP if the child:

- is not able to stop touching their genitals, even when reminded (i.e., sexual play is compulsive);
- tries to involve others in the activity;
- simulates adult sexual acts or uses adult sexual talk; or
- begins to exhibit symptoms of behavioural/emotional difficulty (increased aggression, sadness, withdrawal, or toileting accidents after learning to use the toilet).

#### Abusive reactive behaviour

In this situation, one child who has been abused already acts out the same behaviour on another child. This is serious behaviour and needs to be treated as such. In addition to responding to the needs of the abused child, the needs of the child perpetrator in this situation must also be addressed.

### Sexually obsessive behaviour

In this type of situation, the children may engage in sexually compulsive behaviour. An example of this would be excessive masturbation, which may well be meeting some other emotional need. Most children masturbate at some point in their lives. However, where children are in care or in families where care and attention is missing, they may have extreme comfort needs that are not being met and may move from masturbation to excessive interest or curiosity in sex, which takes on excessive or compulsive aspects. These children may not have been sexually abused, but they may be extremely needy and may require very specific help in addressing those needs.

### Abusive behaviour by adolescents and young people

Behaviour that is abusive will have elements of domination, coercion or bribery, and certainly secrecy. The fact that the behaviour is carried out by an adolescent, for example, does not, in itself, make it 'experimentation'. However, if there is no age difference between the two children or no difference in status, power or intellect, then one could argue that this is indeed experimentation. On the other hand, if, for example, the adolescent is aged 13 and the child is aged 3, this gap in itself creates an abusive quality that should be taken seriously.

### Bullying

Bullying can be defined as repeated aggression – whether it be verbal, psychological or physical – that is conducted by an individual or group against others. It is behaviour that is intentionally aggravating and intimidating and occurs mainly among children in social environments such as schools. It includes behaviours such as teasing, taunting, threatening, hitting or extortion by one or more persons against a victim. Bullying can also take the form of racial abuse. With developments in modern technology, children can also be the victims of non-contact bullying, via mobile phones, the Internet and other personal devices.

Bullying of children can also be perpetrated by adults, including adults who are not related to the child. Bullying behaviour when perpetrated by adults, rather than children, could be regarded as physical or emotional abuse. However, other major forms of child abuse, such as neglect and sexual abuse, are not normally comprehended by the term 'bullying'.

### Bullying in schools

It is recognised that bullying in schools is a particular problem. It is imperative that school management boards should have a policy in place to deal with bullying and that teachers are aware of this policy and of procedural guidelines to deal with it. In situations where the incident is serious and where the behaviour is regarded as potentially abusive, the school should consult the HSE Children and Family Services with a view to drawing up an appropriate response, such as a management plan.

In the first instance, it is the school authorities that are responsible for dealing with bullying in school. School authorities should exercise this responsibility by having regard to the existing advice and to the Guidelines on countering bullying behaviour in primary and post-primary schools from the Department of Education (1993).

Serious instances of bullying behaviour should be referred to the HSE Children and Family Services.

### Identifying reasonable grounds for concern

There are many reasons a worker/volunteer may be concerned about the welfare or protection of a child or young person. *Children First: National Guidance for the Protection and Welfare of Children* states that "Tusla should always be informed when a person has reasonable grounds for concern that a child may have been, is being, or is at risk of being abused or neglected".

Children/young people are sometimes abused by members of their own family, by peers or by others outside the family environment such as strangers, workers or trusted adults. *Children First: National Guidance for the Protection and Welfare of Children* lists the following as reasonable grounds for concern:

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

Wherever appropriate, any issues should be checked with the parents/guardians when considering whether a concern exists, unless doing so may further endanger the child or the person considering making the report.

Abuse is not always committed through personal contact with a child or young person, sometimes it is perpetrated through social media or the use of information and communication technology. Internet and Online Safety must be considered in relation to keeping children and young people safe (please see Appendix 7 – Online Safety and Appendix 8 – Cyberbullying in Tusla’s *Child Safeguarding: A Guide for Policy, Procedure and Practice 2<sup>nd</sup> Edition 2019*, Appendix 1) and should be specifically accounted for in procedures to safeguard children.

#### Complicating factors in child protection

Complicating factors in child protection are identified in *Children First National Guidance for the Protection and Welfare of Children* under the following five headings:

1. Parent or Carer Factors;
2. Child Factors;
3. Community Factors;
4. Environmental Factors;
5. Poor Motivation or Willingness of Parents/Guardians to Engage.

For more information and detail, see the Tusla Child Protection and Welfare Practice Handbook 2, available on the Tusla website.

With the use of new technologies and smart phones being a feature of everyday life it is important to consider the internet and online safety in relation to safeguarding children (see Appendix 7 – Online Safety and Appendix 8 – Cyberbullying in Tusla’s *Child Safeguarding: A Guide for Policy, Procedure and Practice 2<sup>nd</sup> Edition 2019*, Appendix 1).

#### **D. Inappropriate Behaviour and Guidance on Physical Contact**

Staff should observe the following rules:

- Avoid spending excessive amounts of time alone with children/young people;
- Don’t use or allow offensive or sexually suggestive physical and/or verbal language;
- Don’t single out a particular child/young person for favouritism, criticism, ridicule, or unwelcome focus or attention;
- Don’t allow/engage in inappropriate touching of any form;
- Don’t hit or physically chastise children/young people;

- Don't socialise inappropriately with children/young people, e.g., outside of structured organisational activities.

With regard to physical contact, staff should:

- Seek the consent of the child/young person in relation to physical contact (except in an emergency or a dangerous situation);
- Avoid horseplay or inappropriate touch;
- Check with children/young people about their level of comfort when doing touch exercises;
- Be aware of each person's personal boundaries; Touching should:
- Be in response to the need of the child and not of the adult;
- Be with the child's permission – resistance from the child should be respected;
- Avoid breasts, buttocks and groin;
- Be open and not secretive;
- Be governed by the age and development of the child.

## **E. Responding to Concerns**

All workers and volunteers (including students on placement or work experience) have a responsibility to safeguard children and young people and to report any concerns they may have for the protection or welfare of a child/young person.

Regardless of how a concern comes to a worker/volunteer's attention, it must be reported to the DLP.

Through this policy Let's Grow Together provides clear guidance to all workers, students and volunteers on the actions to be taken when they are concerned about the safety or welfare of a child or young person.

### **Dealing with a disclosure**

Should a child or young person disclose to you abuse/abuses perpetrated against them:

- Do listen openly without comment;
- Do not interview; Remember that you have only one piece of the jigsaw: leave it to the professionals to see the whole;
- Do not ask leading or invasive questions;
- Do stay calm. This may be difficult, but it is important not to show an extreme reaction to what you are hearing;
- Do avoid making personal assumptions and do not make any judgmental statements against the alleged perpetrator;
- Do not ask the child/young person to repeat unnecessarily what s/he has told you;
- Do take what the young person says seriously;
- Do acknowledge the risk taken by the young person in telling you;
- Do reassure the young person that it is OK to tell you.

**BUT**

- Do not make promises you cannot keep around the area of confidentiality. You have to report the incident;
- Do inform the young person of what your next step will be, that you have to report this information to your DLP;

- Under NO circumstances be tempted to investigate yourself; that Responsibility lies with the HSE and the Gardaí;
- Do write a detailed account as soon as possible and keep a record of all your own actions;
- Do follow the procedure laid down by Let's Grow Together and report immediately to the DLP, or, if she isn't available, to the Deputy DLP.

A disclosure by a young person over 18 years old must be handled with the same sensitivity as that of a younger person. With the consent of the person, you must follow the same procedures as above and refer to the Vulnerable Adult Policy if necessary. Remember that the alleged perpetrator may still be in a position to offend.

THE ONE THING YOU MUST NOT DO IS NOTHING.

For Your Information: Under *The Protection of Persons Reporting Child Abuse Act* there is a provision of immunity to any person who 'reasonably and in good faith' reports child abuse. It is an offence to report 'knowing that statement to be false'.

### Procedures to be followed if an incident of disclosure occurs

Let's Grow Together is committed at all times to the primacy of the safety of the child/young person.

Let's Grow Together will:

- Ensure that the child/young person is safe, comfortable and exposed to no unnecessary risk;
- Undertake that the child/young person is dealt with in an age-appropriate manner;
- In the case of an emergency phone the Gardaí and the HSE contact;
- In case of suspicion of abuse immediately inform the DLP or Deputy DLP, being clear that it is NOT Let's Grow Together's function to investigate.

### Reporting procedures

Let's Grow Together has adopted the following internal reporting procedure for dealing with disclosures/suspected abuse:

- Any person working with Let's Grow Together who has a child protection concern or has received a disclosure of abuse should contact the DLP immediately;
- The person who has the concern should proceed to create a written report outlining the reasons for their suspicions/details of the disclosure with as many facts as possible recorded. Let's Grow Together's Internal Reporting Form should be used (Appendix 2). This report should be passed on to the DLP as soon as possible;
- The DLP may also contact Tusla – Child and Family Agency for advice in advance of making a formal report. In the case of an emergency, the DLP can make a report without consulting the Welfare Committee;
- When making a report to Tusla, the DLP will follow the standard reporting procedures detailed below;
- The DLP informs the mandated person and relevant person if they are making a report;
- Let's Grow Together's confidentiality policy and procedures should be adhered to. Details should only be provided to those with a direct need to know and information will only be shared when it is in the interest of safeguarding the child/young person;
- The DLP will consider whether to inform the parents/guardians that a report is being made. The parents/guardians will be informed except in cases where there is a belief that doing so will further endanger the child or the person making the report. Advice on informing parents can be sought from Tusla;

- If a decision is taken to inform the parents/guardians, an assessment will be made by Trish Hurley, Suzanne Rigby, or Clóna Twohig of the best way to communicate the information and as to whether the DLP is putting his/herself at any risk by doing so;
- The person who made the original report will be informed of the outcome of the decision-making process.

#### If a decision is taken not to report

If a decision is taken not to report, a confidential written record of how and why this decision was taken should be created and kept by the DLP. Any incident reports should be retained. It may be that a report will be made in the future in light of other developments. Any actions taken because of the concern should be recorded.

The staff member who made the original report should be informed of the decision taken. If a report hasn't been made, they should be provided with the reasons for this decision in writing and informed that they can still make a report in their personal capacity. All staff members should be made aware of the steps to take to make a report and the provisions of the *Protection for Persons Reporting Child Abuse Act (1998)* which offers protection from civil liability for anyone who makes a report, once they are acting in good faith.

#### Record-keeping

- Child protection records should be factual and include details of contacts, consultations and any actions taken;
- Child protection records should be updated as required and reviewed regularly by the DLP;
- Let's Grow Together and its DLP will cooperate in the sharing of records with Tusla where necessary for the protection or welfare of a child;
- All child protection records will be kept safely and securely and managed in line with Let's Grow Together's Data Protection and Confidentiality Policy

#### Reporting for Mandated Persons

Mandatory reporting, as provided for under *Children First 2017*, places a legal obligation on certain individuals known as 'mandated persons' to report harm or potential harm to children.

Mandated Persons have two principal legal obligations:

- To report concerns which meet or exceed a particular threshold;
- To assist Tusla in the assessment of mandated reports, where requested to do so.

#### Making a Mandated Report

- Any Mandated Persons employed by Let's Grow Together must report concerns of harm or potential harm to children to Tusla by following the Standard Reporting Procedures. They must indicate on the report form that it is a Mandated Report;
- Guidance for Mandated Persons on the thresholds at which, or above which, they have a statutory obligation to report the concern under the *Children First Act 2017* can be found in Chapter 3 of *Children First: National Guidance for the Protection and Welfare of Children*;
- Additionally, Let's Grow Together requires Mandated Persons to make reports jointly with the DLP.

### Mandated assisting

Any Mandated Person employed by Let's Grow Together should be aware that they may be required by Tusla to assist them in the assessment of mandated reports.

Important Note: Mandated persons cannot make anonymous reports under the Act.

Contact numbers for Tusla offices nationwide are available on the Tusla website ([www.tusla.ie](http://www.tusla.ie)) or through the Tusla National Office (Tel. 01-7718500).

If you are concerned about a child but unsure whether you should report it to Tusla, you may find it useful to contact Tusla to informally discuss your concern. This provides an opportunity to discuss the query in general and to decide whether a formal report of the concern to Tusla is appropriate at this stage.

If the concern is below the threshold for reporting, Tusla may be able to provide advice in terms of keeping an eye on the child and other services that may be more suitable to meeting the needs of the child and/or family.

Under no circumstances should a child be left in a situation that exposes him or her to harm or to risk of harm pending Tusla intervention.

In the event of an emergency where you think a child is in immediate danger and you cannot get in contact with Tusla, you should contact the Gardaí. This may be done through any Garda station.

Let's Grow Together's local garda station is Gurranabraher, Bakers Road, 021 494 6200.

Out of hours defers to Anglesea St, 021 452 2000. If you do not have the number of a local garda station, phone 999 or 112. An emergency out-of-hours social work service provides social work consultation and advice to the Gardaí. The Gardaí have access to an on-call social worker and placements for children who need them due to the immediate risk to their safety.

The Standard Report Form for reporting child welfare and protection concerns to Tusla (Appendix 2) should be used when reporting child welfare and protection concerns to Tusla. If a report is made by telephone, this form should be completed and forwarded subsequently to Tusla within three days.

Reports can also be made on the TUSLA portal: [www.portal.tusla.ie](http://www.portal.tusla.ie).

DLP and Staff member notifying TUSLA of Child Protection concern has 4 days from the time you commence your online report to submit the report. You will receive an email within 1 day confirming your report has been successfully submitted. If you do not receive this email, you should consider your report as not received and contact your local Tusla office directly to clarify.

Please note the online reporting system allows reporters to print a copy of their report form at submission time and up to 2 days from the My Submissions list. A digital copy of the submission is logged in case notes and saved in client's folder. Additionally, a Child Protection Notification Register is saved on the Let's Grow Together Drive.

### Information to include when making a report

To help Tusla staff assess your reasonable concern, they need as much information as possible. You should provide as much relevant information as you can about the child, his/her home circumstances and the grounds for concern. These could include:

- The child's name, address and age;
- Names and addresses of parents or guardians;
- Names, if known, of who is allegedly harming the child or not caring for them appropriately;
- A detailed account of your grounds for concern (e.g. details of the allegation, dates of incidents, and description of injuries);
- Names of other children in the household;

- Name of school the child attends;
- Your name, contact details and relationship to the child.

You should give as much information as possible to social workers at an early stage so that they can do a full check of their records. For instance, they can see if the child and/or a sibling have been the subject of a previous referral, or if an adult in the household had previous contact with the child protection services.

As outlined in *Children First (2017)*, child protection is a multiagency, multidisciplinary activity. Agencies and professionals must work together in the interests of children.

### Role of the Child and Family Agency

Tusla has responsibility for child welfare and protection services, family support, educational welfare and a range of other services, including those relating to domestic, sexual and gender-based violence.

The specific role of Tusla is to promote the welfare of children who are at risk of not receiving adequate care and protection. Under the *Child Care Act 1991*, Tusla is obliged to coordinate information from all relevant sources about a child who may not be receiving adequate care and protection. If it is found that a child is not receiving adequate care and protection, Tusla has a duty to take appropriate action to promote the welfare of the child. This may include supporting families in need of assistance in providing care and protection to their children.

### Role of An Garda Síochána

The involvement of An Garda Síochána in cases of alleged child abuse and neglect stems from its primary responsibility to protect the community and to bring offenders to justice. Where it is suspected that a crime has been committed, An Garda Síochána has overall responsibility for the direction of any criminal investigation. It is the function of An Garda Síochána to interview and take any statements that will form part of the criminal investigation file.

### Working with other agencies

*Children First (2017)* describes in detail how these two agencies should work together.

Let's Grow Together takes the following approach to working with other agencies and organisations in relation to child protection:

- Recognise the necessity of a coordinated approach to child protection and will cooperate with the Gardaí, Tusla - Child and Family Agency and any other appropriate agency or organisation;
- Awareness that there are a number of organisations that have specific expertise in relation to child protection and the welfare of children/young people. The DLP, or another staff member/volunteer, may seek advice from these organisations on a specific issue. There may be circumstances when it is more appropriate to refer a young person to another organisations/services;
- If Let's Grow Together is working with another organisation on a programme/event involving young people, there will be discussion around the welfare and child protection policy and procedures to be used and where responsibility lies in terms of reporting, before the programme or event takes place. It is recommended that good practice is followed and that the most robust policy and procedures take precedence.

## Policy Statement on the involvement of primary carers

Let's Grow Together is committed to being open with all primary carers. Parents will be introduced to and required to sign Let's Grow Together's consent form at the beginning of their relationship with the service; this consent details that Let's Grow Together's child protection policy requires the reporting to Tusla child protection concerns. Where child protection concerns arise, a team member will inform parents of these concerns before reporting them to Tusla, where possible.

Let's Grow Together undertake to:

- Advise primary carers of this child protection policy;
- Inform primary carers and schools of all activities and potential activities involving the young people;
- Issue consent forms where relevant;
- Comply with health and safety practices;
- Operate child centred policies in accordance with best practice in the field;
- Adhere to stated recruitment guidelines;
- Ensure, as far as possible, that activities are age-appropriate;
- Encourage and facilitate the involvement of parents, carers or responsible adults where appropriate.

If there are concerns about the welfare of a child/young person, Let's Grow Together will:

- Respond to the needs of the child or young person;
- Inform the primary carers on an on-going basis unless the action puts the child or young person at further risk;
- Be conscious of our legal obligation where there are child protection and welfare concerns to pass those on to the Duty Social Worker and, in an emergency, the Gardaí;
- Immediately ensure the safety of the child in the event of a complaint against a member of staff and inform primary carers as appropriate.

As a child-centred organisation, Let's Grow Together is committed to putting the interest of the child/young person first. To that end, Let's Grow Together will:

- Contact local HSE and Gardaí where there is a child protection welfare concern;
- Encourage primary carers to work in partnership with us under the guidelines set out by the organisation to ensure the safety of their children;
- Have a designated contact person available for consultation with primary carers in the case of any concern over a child or young person's welfare. Workers/volunteers may feel uncomfortable approaching a parent about a concern. You may have to discuss a concern about welfare or protection of a child/young person or an issue which relates to the child/young person's development needs. The following best practice tips may be useful:
  - Make sure parents/guardians have prior awareness of the guiding principles, policies and duties to safeguard children;
  - Be straightforward and clearly explain the nature of the concern or issue, e.g. by using facts and records of observations made;
  - Think about the time and place to have the conversation. Find a time when parents / guardians are not in a hurry;
  - Find a place that is quiet and allows privacy;
  - Consider arranging to meet parents/guardians;
  - Use a calm and gentle tone, consider the language used;

- Start with positive comments and observations about the child/young person. Ensure the parents/guardians know that you care about the welfare of their child and recognise their strength;
- Refer to how the situation may be affecting the child/Young Person;
- Start with positive comments and observations about the parents/guardians. Most are trying to do their best for their children and will appreciate your acknowledgement of how challenging parenting can be at times;
- Give parents/guardians an opportunity to talk; ask them for an explanation and acknowledge their feelings;
- Take the approach that you are working together to address any issues in the best interest of the child/young person;
- Don't blame, don't get defensive and don't take things personally;
- Ensure that you are supportive but also address the issue;
- Refer to your guiding principles and child safeguarding procedures for support;
- Offer possible solutions, where appropriate;
- Advise parents/guardians how you plan to follow up and keep them informed and involved, where appropriate. Where it is not possible to contact the parents/guardians to discuss a concern you may need to discuss it with the DLP or Tusla duty social worker through the Dedicated Contact Point.

#### Responding to adults who disclose childhood abuse

There are an increasing number of adults disclosing abuse that took place during their childhood. Often such disclosures come to light when people attend counselling. They also sometimes arise in adult services and services which work with parents/guardians and families. Where such a disclosure is made it is essential to establish whether there may be current risk to any child or young person who may be in contact with the person subject to an abuse allegation (PSAA) revealed in the disclosure. This is important even where the children/young people about whom there may be a concern are still to be identified. If any risk is deemed to exist to a child/young person who may be in contact with a PSAA, follow your organisation's child protection and welfare reporting procedure; reports should be made to Tusla without delay (see *Children First: National Guidance for the Protection and Welfare of Children* for further information). For mandated persons, the obligation to make a mandated report applies where you have knowledge or belief that a child has been, is being or may be harmed.

#### Procedure for allegations of abuse against team, volunteer or student

In the event of an allegation being made against an employee, the following steps will be taken:

- Management must be alerted to the allegation by the reporter, whether mandated person or DLP;
- The first priority is for the safety of the child/young person; management must make sure no child or young person is exposed to unnecessary risk;
- Parents/guardians should be informed of any action planned while having regard to the rights to confidentiality of others, such as the person against whom the allegation has been made. Tusla will follow relevant policy when assessing allegations of abuse made against workers or volunteers;
- The Manager will inform the Let's Grow Together Chairperson. The Manager will inform the employee of the fact that an allegation has been made and of the nature of the allegation and will be given an opportunity to respond;

- These measures will be proportionate and will not unreasonably penalise the employee, unless necessary to protect children;
- The Chairperson will advise the employee and agreed procedures will be followed;
- Close liaison will be maintained with all parties to ensure that all possible assistance is given to their investigations;
- Disciplinary procedures as outlined in Employee/Volunteer Handbook will be invoked if an allegation is upheld.

## **F. Confidentiality**

It is essential that there is a clear understanding of professional and legal responsibilities regarding confidentiality and the exchange of information.

- Where child protection and welfare concerns arise, information must be shared on a 'need to know' basis in the best interest of the child/young person with the relevant statutory authorities and with parents/guardians;
- No undertakings regarding secrecy can be given. Those working with children/young people and families and in adult services should make this clear to parents/guardians and to the child/young person;
- The proportionate provision of information to the statutory agencies necessary for the protection of a child is not a breach of confidentiality or data protection;
- Parents/guardians and children/young people have a right to know if personal information is being shared, unless doing so could put the child/young person at further risk or may put the reporter at risk.

### **Information sharing and record-keeping**

Let's Grow Together strives to ensure that good quality information is gathered and shared with Tusla and enables team to be clear on their responsibility. Information about concerns for the welfare or protection of a child/young person is gathered early and shared as soon as possible with the appropriate person within the organisation (DLP). This facilitates early warning signs being picked up and interventions being put in place at the earliest opportunity.

Records should be factual and include details of contacts, consultations and any actions taken.

- All agencies dealing with children must cooperate in the sharing of records with Tusla where a child protection or welfare issue arises;
- Ensure that records on child protection concerns, allegations and disclosures are kept securely and safely within the organisation on the IDT drive or in the secure, locked filing cabinet in the office;
- Records should only be used for the purpose for which they are intended;
- Records should only be shared on a need-to-know basis in the best interests of the child/young person;
- Only interdisciplinary team members and students on placements have access to case records/notes;
- Records are kept for the period of time as stated under the Let's Grow Together record retention policy;
- An anonymised Register of Reports is kept for the purposes of noting the date that a report was made (but not the nature of the report or to whom it related);
- Child protection records should be updated as required and reviewed regularly by the DLP;

- You must be aware of and abide by any regulations specific to your sector or area of work with regard to record-keeping.

Home visitors have a Welfare Sheet in the case notes, where observations that are not necessarily child protection level are logged. The accumulation of these observations helps to form a clearer picture of chronic neglect or adversity over time. This may lead to a full child protection notification when it is all taken into context.

## Section 4. Working Safely with Children and Young People

### Safe Recruitment and Selection for Workers and Volunteers

Let's Grow Together takes all reasonable steps to ensure that only suitable people are recruited to work with children and families by adopting and consistently applying a safe and clearly defined method of recruiting team and volunteers.

Best practice in the recruitment and management of workers and volunteers includes providing information relevant to the post, seeking information from the applicant, access to Garda vetting, taking up of references, good HR practices in interviewing, induction, training, probation and on-going supervision and management.

Let's Grow Together's procedures include the following;

- Recruitment and selection;
- Application of Garda Vetting;
- Induction including induction on your guiding principles and child safeguarding procedures;
- Supervision and support for workers and volunteers.

The implementation of thorough recruitment and selection procedures will help to keep children and young people safe within Let's Grow Together. Good practice in management and supervision of workers and volunteers after appointment is a further essential safeguard to help keep children/young people safe.

### Garda Vetting Policy

Under the *National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016* all people working with children and vulnerable adults are required to undergo vetting. Let's Grow Together vets applicants who will be working directly with children with the National Vetting Bureau prior to appointment and commencement of work.

Let's Grow Together is responsible for deciding on the suitability of individuals, based on the information received under a vetting application, giving due regard to the organisation's needs, client group and ethos. Let's Grow Together sets out clear criteria which would rule out an applicant.

Information received about applicants should be treated as highly sensitive and confidential and are stored securely and accessible only to specified individuals within Let's Grow Together. Where information arising from a vetting application leads Let's Grow Together to exclude a particular applicant, they will be informed of the reason for the decision and afforded an opportunity to appeal. Further information on vetting can be accessed from the National Vetting Bureau's website, <https://vetting.garda.ie/>.

In line with data protection legislation, information from the National Vetting Bureau is only retained by Let's Grow Together when necessary and is stored securely with secured access. Where information is destroyed, Let's Grow Together includes a note on any personnel file stating that a vetting check was carried out and that the person's conditional offer of appointment was confirmed/withdrawn as a result. Let's Grow Together includes criteria for re-vetting in its organisation's vetting policy. As detailed already Let's Grow Together has a robust recruitment/selection policy. While we recognise the importance of garda vetting in safeguarding the wellbeing of our members, we also recognise that it is only one aspect of safe recruitment.

### Safeguarding Training

Child safeguarding training for team Let's Grow Together management is responsible for ensuring that all workers and volunteers are trained in the recognition of the signs of abuse, understand their responsibilities to safeguard children and know the procedures to follow. All workers complete the online Tusla Children's First training module.

Child safeguarding training includes:

- Induction training to introduce new workers/volunteers to the organisation's guiding principles and child safeguarding procedures;
- In-house training is used to ensure workers and volunteers are familiar with the organisation's guiding principles and child safeguarding procedures;
- Mandated persons will be provided with specific training in relation to their statutory responsibilities under the *Children First Act 2015*, through Tusla CFA training programmes locally or online;
- Specific training for those with additional responsibilities, such as DLPs/Deputy DLPs or members of management are sourced through Tusla CFA training programmes locally or online;
- The content of any training accessed or delivered is consistent with Children First: National Guidance for the Protection and Welfare of Children, the Children First Act 2015 and this Guide. Tusla's Best Practice Principles for Organisations in Developing Children First Training Programmes (available at [www.tusla.ie](http://www.tusla.ie)) is used to review and develop training for Let's Grow Together team. Tusla provides a universal Children First e-learning programme, called Introduction to Children First. It covers recognising and reporting child abuse, the role of mandated persons, including mandated assisting, and the responsibilities of organisations working with children to safeguard children using their services. The e-learning programme can be completed on the Tusla website ([www.tusla.ie](http://www.tusla.ie)). All Let's Grow Together team are requested to complete this online training.

### **Keeping Training Records**

Let's Grow Together workers gather and retain a record of training information including:

- Date and name of training programmes delivered;
- Names of worker/volunteers who attended and their position within the organisation;
- Details of workers/volunteers who did not receive training but need to complete it;
- Number of workers/volunteers trained;
- Training programmes completed by each worker/volunteer (e.g. induction into the organisation's guiding principles and child safeguarding procedures, child safeguarding training, DLP training, refresher training, etc.);
- The names of the trainers who delivered the programme and the organisation they were from. A signed receipt of all workers/volunteers who have been given a copy of Let's Grow Together's declaration of guiding principles and child safeguarding procedures (can be done at induction or In-house training).

### **Safe Management of Activities**

Part of keeping children and young people safe and reducing the likelihood of harm is having clear guidelines in place regarding how activities are organised and run. When planning and running activities, in order to minimise opportunities for accidents or harm to children/young people engaged with Let's Grow Together the following procedures are followed:

#### **Let's Grow Together's register of children and young people**

- Have criteria for Let's Grow Together registration (registration leaflet);
- Have a registration system for each child/young person (Let's Grow Together database);

- Keep a record on each child/young person, including address and family contact numbers (Let's Grow Together database);
- Keep medical details, any individual needs and emergency contact telephone numbers accessible.

### Maintaining good record-keeping

Let's Grow Together keeps up-to-date records of the following:

- Attendance;
- Accidents;
- Incidents;
- Consent forms;
- Any complaints or grievances.

### Health and Safety Responsibilities

Let's Grow Together ensures that:

- Any buildings being used are safe and meet required standards;
- There is sufficient heating and ventilation;
- Food preparation areas, where they exist, are sanitary and meet food safety requirements; Toilets, shower areas and washing facilities are to standard and meet the accessibility requirements of all members;
- Fire precautions are in place;
- First aid facilities and equipment are adequate;
- There is access to a phone;
- Equipment is checked regularly;
- Insurance cover is adequate.

### Accidents and Incidents

Let's Grow Together are committed to meeting their obligation in relation to the *Safety, Health and Welfare at Work Act 2005*. Let's Grow Together ensures that:

- Activities being undertaken are suitable for the abilities, ages and experience levels of the participants; children or young people should not be excluded from any activities;
- Equipment and facilities meet appropriate safety and quality standards and are appropriate to the needs of the participants;
- Activities are risk assessed and that appropriate responses to identified risks are planned and implemented;
- Where protective equipment is deemed necessary, it should be used;
- Any injuries should be recorded with a note of the action taken. Let's Grow Together maintains an accident/incident book with a specific incident form for completion by workers/volunteers (see appendices 17 and 12 Tusla's *Child Safeguarding: A Guide for Policy, Procedure and Practice 2nd Edition 2019*, Appendix 1). Due regard must be given to confidentiality;
- Parents/guardians should be notified by the appropriate person of injuries/illnesses which occur while children/young people are participating in an activity;
- Insurance cover is adequate to the organisation's needs.

### Recording accidents and incidents

Let's Grow Together has appropriate recording mechanisms in place to detail any accidents or incidents which may occur. In differentiating between the two it is useful to note that an incident does not usually involve any casualty or the loss of life, while an accident will involve some form of injury.

Incidents are recorded separately from accidents as they may need to be referred to when considering suspected child abuse or neglect.

### Working with other organisations/using external facilities

When using facilities or services provided by another organisation, and when collaborating with other organisations, Let's Grow Together team will follow the Let's Grow Together guidelines for reporting procedures for child protection or welfare concerns.

### Use of Photography, Video and/or Social/Digital Media

Information and communication technology (ICT) forms an important platform for communication which is commonly used by adults and children/young people alike. It is important when working with children and young people to ensure that the use of digital media and ICT is consensual, ethical and that it is not misused to cause harm to an individual.

Let's Grow Together has established a code of conduct for the use of digital media and ICT that sets out guidelines in respect of:

- Consent for filming and photography and use of same (See Let's Grow Together consent form for photos and/ video recording);
- Use of the organisation's information, including information about children, on social media sites;
- Expectations around the conduct of team when using social media sites such as Facebook, Twitter, etc.;
- Use of mobile phones, i.e. calling, photographing, filming, texting while in the service.

### Managing Workers and Volunteers

Let's Grow Together's policies, procedures and issues related to the management of workers and volunteers are in place to help create a safe, child-centred environment for children and young people. These include:

- A code of behaviour for workers and volunteers which provides guidance on acceptable and unacceptable practice and how workers/volunteers are to respond if they have concerns about the conduct of a colleague;
- Safe management practices which include supervision and support of workers/volunteers as well as reviews of work or professional development planning to ensure that practice remains child-centred and aligned with the aims of the organisation.

### Supervision and Support of Workers and Volunteers

Management and supervision of workers and volunteers after appointment is equally important to keep children safe. Supervision of workers/volunteers helps maintain best practice and safeguards children availing of your service.

All workers/volunteers have regular reviews of their practice to ensure that they improve over time. An annual appraisal of work is also conducted to allow for the recognition of good work and to help to develop skills further; this is a formal, recorded process.

## Functions of Supervision

Supervision provides a regular, structured opportunity to discuss work, review practice and progress, and plan for future development. The main functions of supervision are:

- Management to hold the worker accountable for practice to ensure safe, quality, care for children and families;
- Support for the individual team member in what is a demanding and potentially stressful working environment. This may involve debriefing which addresses the emotional impact of such work;
- Learning and development of each individual to identify their knowledge base, attitude, learning style and skills; to identify learning needs and the strengths and weaknesses of the worker; and to plan and set targets for on-going development including outlining of and review of learning objectives;
- Mediation to ensure healthy engagement with, and communication between, the individual and the organisation.

Let's Grow Together utilises a formal individual supervision model. All workers and students are offered reflective practice supervision.

## Dealing with a Concern about Another Worker/Volunteer

It is important that if a worker or volunteer has a concern about the behaviour of another worker/volunteer that they report these concerns to the DLP. Where the concern relates to the DLP, reports should be made to another senior manager within the organisation.

Let's Grow Together creates an open and supportive environment where workers feel comfortable and safe to pass on these types of concerns. Concerns about colleagues' behaviour may relate to:

- Breaches of the organisation's code of behaviour;
- Conduct which may breach professional standards or codes of ethics;
- Suspected or witnessed abuse.

The concern about another worker/volunteer may also come to Let's Grow Together's attention through the complaint's procedure. Please see procedure for responding to allegations of abuse against workers/volunteers in previous section.

Where a worker/volunteer has a concern about a colleague they should:

- Bring it to the attention of the DLP or a senior manager. If the concern relates to poor practice, it should be discussed with the relevant manager. If the concern involves suspected or witnessed abusive behaviour, this should be reported without delay to the DLP (following the organisation's reporting procedure);
- Keep a record of the concern. The DLP or senior manager will consider if the concern constitutes a child protection concern, if so he/she must follow the organisation's reporting procedures for child protection or welfare concerns. It will also be necessary to follow the organisation's procedure for responding to allegations of abuse against workers and volunteers;
- The ultimate responsibility for dealing with complaints rests with Executive Director (Katherine Harford) but in practice – and depending on the severity of the complaint - complaints/grievances/comments are dealt with by the line managers of the various aspects of the company: Finance & Governance Lead: Sonya Dawes; [sonya@letsgrowtogether.ie](mailto:sonya@letsgrowtogether.ie).

## **Disciplinary Procedures**

Disciplinary procedures are essential in the overall response to a failure by a worker/volunteer to meet the expected standard of work or behaviour in their working practice. Disciplinary procedures are written, step-by-step procedures which an organisation commits itself to follow in every case where a worker/volunteer may have to be warned, reprimanded, or dismissed as a result of a complaint or failure on the worker's part to meet the expected standards.

Disciplinary procedures may be instituted when:

- There is a complaint made about a worker or volunteer;
- There is an alleged breach of the code of behaviour;
- There is an allegation of abuse made against a worker or volunteer.

The disciplinary procedures will need to work alongside and be consistent with your complaint's procedures, code of behaviour and procedure for managing allegations of abuse against workers/volunteers.

When dealing with employees, procedures must comply with employment law. When dealing with volunteers, in the absence of employment law, procedures must adhere to the principles of natural justice, good practice and should not unfairly discriminate against the volunteer. Organisations may wish to seek legal advice when developing/reviewing their procedures to ensure that they are robust and reasonable.

## **Rights of Workers**

Any person subject to disciplinary procedures is entitled under fair procedure to:

- Have clear information in respect of the complaint;
- Copies of any documentation used in decision making;
- An opportunity to provide their account and for this to be considered before any conclusions are drawn;
- Have conclusions and decisions set out in writing;
- A right of appeal.

## **Appeals Against Disciplinary Action**

If the worker/volunteer feels that the disciplinary action taken against them is wrong or unjust they have the right to appeal against the decision. An appeals procedure should be developed as part of the disciplinary procedure.

When dealing with an allegation against a staff member, two separate procedures will be followed in parallel:

1. In respect of the child/young person: Trish Hurley will deal with issues related to the child/young person.
2. In respect of the person against whom the allegation is made Katherine Harford will deal with issues related to the staff member.

## Section 5. Initiatives Supported / Hosted by Let's Grow Together

### Kidscope Paediatric Clinic

Kidscope is a children's clinic which offers free health and development assessment and onward referral for pre-school children aged 0-6 living in Cork City Northwest.

Let's Grow Together hosts the Administrative Co-ordinator and is the data holder for the clinic.

### Welfare and Child Protection

Kidscope adheres to the above child protection and safeguarding policy. Due to the very young age of the participants and the nature and scope of the clinic Kidscope includes the following additions to its practice:

- Are alerted to the need to treat children with dignity and not to ask them to do anything which might embarrass them or be contrary to their cultural or religious precepts;
- Will always be informed of any changes regarding child protection laws or best practise by consulting Trish Hurley DLP;
- Understand that the language and tone they adopt are important factors in a child's sense of safety and reassurance;
- They are trained to consider the impact of the language used by others may have on children and of the need to take steps to avoid a situation where language could be used to unsettle or intimidate children;
- Are trained to consider the safety of the spaces they are responsible for, the appropriateness of the equipment to be used given the age and ability of the children expected to attend the clinic and of the need to take steps to eliminate any equipment that could endanger the children attending;
- It is sometimes necessary to have some physical contact during the check up and may need support from other members of the team. Staff should be mindful of what/how much contact is appropriate;
- Adhere to the Children's First Safe Touch guidelines;
- External site users are instructed not to touch children at any time unless the child is at risk of hurting themselves or another person or in a medical emergency;
- Will remove assumptions, judgements and expectations about the cultural and linguistic backgrounds of all families and the team;
- Will regard all individuals equally, showing sensitivity and providing equal opportunities for all children of all backgrounds;
- Will actively intervene in situations when bias is shown and encourage children to challenge bias;
- Will demonstrate positive attitudes when making changes to accommodate all children;
- Work as a team with parents and other professionals to develop, carry out and review plans for children with additional support needs;
- Helping them access the service;
- Ensuring the usage and dosage has been explained and understood after seeing the doctor;
- Available to answer questions as they arise;
- Adhere to the company policies around inclusion, safeguarding and use of media;
- Storing and securing sensitive personal data in a GDPR compliant way in line with HSE guidelines.

## **Kidscope Team and Volunteers**

The clinical team made up of intersectoral interdisciplinary professionals are aware of Let's Grow Together's Safety Statement and:

- All staff are registered with their respective governance bodies and are held to the highest standards of practice;
- Student Placements are vetted by their governing academic institutions.

## **Accident**

If an accident occurs during a clinic:

- The parents/guardian and/or clinic team will assess the situation and if necessary, remove the child to be cared for;
- Health and Safety procedures laid out in both the Let's Grow Together Safety Statement, Niches H&S policy as well as HSE will be followed;
- Where appropriate, we will offer first aid assistance and or access to first aid kit and/ or phone to contact the emergency services, depending on what is necessary;
- If a child needs to take medication or may need a space where they can be administered medication, the parent must discuss this with Kidscope Clinic Coordinator prior to attending so a private room can be made available;
- Kidscope is a feeding-friendly clinic and will endeavour to make a comfortable space for parent if needed;
- Kidscope staff will not be responsible for personal care;
- In the event of an evacuation, Niches fire safety protocol will be followed as we are operating out of their building.

## **Cork Child Friendly City**

Let's Grow Together hosts the Development Worker and data/information relevant to their role. Cork Child Friendly City adheres to the above child protection and safeguarding policy.

## **Welfare and Child Protection**

Cork Child Friendly City and other long-term projects that are resident at Let's Grow Together will require additional administrative and health and safety measures to ensure that children and young people are safe in our care. The most crucial element of these measures is to ensure that every young person sitting on the panel completes a registration form when they join or any other long-term project.

The registration form will require parents or legal guardians to provide information on participants name, age, contact details, contact for guardians, medical conditions, specific requirements or any other information that could inform a young person's ability to participate in the project. Members that are over the age of 18 can complete their own registration form, but they must provide a contact for a parent or guardian in the case of an emergency.

The CCFC or development worker should:

- Be familiar with the Let's Grow Together's Policies and Procedures;
- Be familiar with any medical or other factors that may affect a young person's participation;
- If privy to sensitive personal information, ensure it is managed in line with the Let's Grow Together's Data Protection Policy & Procedures (Appendix 3);

- Report any concerns about the wellbeing of a member to the youth panel DLP and follow reporting procedures;
- Respect a young person's personal space and privacy;
- Never behave in a way that could be interpreted as inappropriate;
- Never let a situation get out of control -often the worst thing to do is nothing;
- Avoid taking a session alone. Primary carers should be informed if this is going to be the case;
- Be sensitive to instances of bullying and follow the Let's Grow Together's Policy;
- Try to avoid giving lifts to young people if possible. Use common sense if a scenario arises where you feel it is necessary to bring a young person home;
- Avoid spending excessive amounts of time alone with young people and do not socialise inappropriately with members e.g. outside of organised activities;
- Be mindful of how meeting an individual young person could be interpreted. Ideally have another adult present or meet in a public place;
- Be mindful of the danger of creating "dependent" relationships with specific young people. Such relationships can be problematic for both leader and member and often if a young person needs support with a particular issue or situation, you should refer them to a third party with specific expertise. Let the Designated Person know should an issue arise;
- Recognise the importance and weight of personal promises to members. Never make promises you can't keep e.g. if a young person makes a disclosure of abuse to you, you can't promise confidentiality.

### **Development Worker/Leaders**

Best Practice - leaders should remember to:

- Treat all children/young people fairly and equitably – do not discriminate on the grounds of gender, race, religion, ethnicity, cultural background, sexual orientation or socioeconomic status, family status, age, or disability;
- Listen to and respect the opinions of children and young people;
- Act in a way that is professional and responsible;
- Help create an environment in which children/young people feel comfortable, accepted, and able to express themselves;
- Ensure that the material/approach is age appropriate and suits the developmental needs of the group;
- Provide encouragement and support to all children/young people regardless of their ability;
- All criticism should be constructive and not overly focused on any one individual;
- Adhere to and enforce the group contract;
  - \*See note on contract below\*
- Encourage feedback and discussion;
- Use appropriate language. Avoid jokes or comments that could be interpreted as inappropriate;
- If delivering a workshop session or leading a session, ensure adequate preparation;
- Be willing to participate in evaluations;
- Be mindful of an individual's personal trauma;

- Be prepared for situations whereby issues raised in the workshop may make a young person uncomfortable or upset. This may even happen with topics that seems 'safe';
- Be aware that their work with the group and how they conduct themselves will have a bearing on the reputation of CCFC and Let's Grow Together;
- Be mindful of the participant's level of comfort when doing exercises that require physical contact. Ask a child/young person's permission before making physical contact with them. \*\*See note on Physical contact \*\*;
- All CCFC Staff will abide by Let's Grow Together's Data Protection Policy & Procedures in relation to images, recordings and data of children/young people. All images and recordings will be stored in line with Let's Grow Together's policy (Appendix 3);
- Have easy access to contact numbers of the Designated Child Safety personnel, the contact number for your line manager and the location of the location of emergency numbers;
- The location of the contact numbers of the parents/carers of all the people involved in the CCFC (emergency contact list with Donna O Keeney in main office);
- The location of Fire Exits, appointed Assembly Points and emergency procedures.

### **Group Contract**

A group contract can function to ensure that everyone is aware of what is expected of them and what they can expect from the CCFC. Discussions around the contract can lead to an open and honest debate. If children/young people are involved in the drafting process they have a greater sense of ownership and a greater investment in ensuring that the contract is adhered to. Both the rights and responsibilities should be up for discussion. The group contract can also be used to inform parents of the terms and conditions of participation in an event. It is a good idea for members to sign a copy of the final document.

CCFC should make a clear statement that bullying is not acceptable and has also developed an anti-bullying policy to support the contract. This can be included in your welfare/child protection statement, but this should also be made clear to members and parents.

It is important that the issue of bullying is raised during the discussions around a group contract. The facilitator/development worker should encourage the members to openly discuss what they understand by bullying and its effects on a young person and they should also familiarise themselves with different types of bullying so they can raise examples that are not covered in discussion.

### **Physical Contact with children/young people**

Often in the participatory workshops, physical contact can be necessary to an exercise. It is important that leaders use their common sense. Ask a child/young person if it is ok to make physical contact with them, for example, in circle exercises with young children "is it okay for me to hold your hand?." If in doubt, some organisations use the principle, that once the young person initiates the physical contact it is ok (within limits of course).

Do not forget: The relationship between the development worker/leader and the children/young people is integral to CCFC and can be a make-or-break factor in meaningful participation and consultation.

The leader must think of his/her own welfare too! It can be an intensive and demanding role. Be aware of your own limitations and do not over-reach or exhaust yourself. It is important to have a mentor, friend to act as a sounding board for ideas.

## **CCFC Panel Members**

It is important that young people get the most out of their time in CCFC. As with anything that involves a group of people working together, it is essential to have a shared sense of purpose, for each person to be aware of their responsibilities and to have a shared code of behaviour so that everyone involved understands what is and what is not acceptable. If there is clarity on such matters, it should mean that all involved get on with the business of CCFC knowing what the boundaries and limits are.

Young people are at the centre of the work and as stated previously should be listened to and valued. They should openly discuss what they expect from the CCFC and be able to voice any concerns they may have.

CCFC might elect members to sit on various groups or councils who will represent the CCFC at regular meetings.

## **Members over 18**

Members who are over 18 are legally adults and therefore have the same legal rights and responsibilities as an adult. This should be considered when drawing up any policy or document that concerns members.

CCFC should take particular care when dealing with topics that may be discussed e.g. alcohol, smoking, group rules such as going off on their own when away. CCFC chooses to state that all rules pertain to all members regardless of age.

Young adult members do not have to seek parental consent. It is, however, good practice to still have emergency contacts for them.

A disclosure of abuse by a member over 18 years of age must be handled with the same sensitivity as that of a disclosure by a young person under 18. Ideally with the consent of the victim\*, the Development worker may decide to follow the same reporting procedures as with any other young person, as the alleged perpetrator may still be able to offend. Advice can be sought from Tusla

Note: Please see our policy on working with Vulnerable adults.

\*As outlined in the paragraph below, if there is a concern that the alleged abuser may pose a current risk to any child/young person, a report should be made to Tusla (or Gardaí in the case of an emergency).

No child should ever be left at risk of abuse. *Children First (2017)* gives the following guidance on retrospective disclosures by adults: *An increasing number of adults are disclosing abuse that took place during their childhoods. Such disclosures often become known when adults attend counselling. It is essential to establish whether there is any current risk to any child who may be in contact with the alleged abuser revealed in such disclosures. If any risk is deemed to exist to a child who may be in contact with an alleged abuser, the counsellor/health professional should report the allegation to Tusla. The HSE National Counselling Service is in place to listen to, value and understand those who have been abused in childhood. The Service is a professional, confidential counselling and psychotherapy service and is available free of charge in all regions of the country (see hse.ie) The service can be accessed either through healthcare professionals or by way of self-referral (Freephone 1800 477477).*

## **Dealing with Challenging or Disruptive Behaviour**

It can be difficult to deal with a child/young person who is behaving in such a way that they are disrupting the work of the group and making other members frustrated and annoyed or even putting themselves or others in danger. It is important that leaders know how to react to such behaviour. The following are points to consider:

- It is recommended that more than one leader be present when dealing with a disruptive member;
- A written record of any serious incidents of disruptive behaviour should be kept. Follow Let's Grow Together's procedures for reporting incidents (section 5) This record should be given to the DLP;
- The DLP should be informed if a member displays such behaviour consistently;
- Regardless of how frustrating the situation becomes; leaders should always follow the agreed code of behaviour and never use means such as physical punishment or verbal abuse;
- It may be that dealing with a particular young person is beyond the expertise of the development worker. It is important that leaders recognise their own limitations. CCFC workers may have to seek advice from a specialist organisation;
- Leaders should refer to the group contract and the agreed consequences of breaking the contract;
- Keep in mind that the child/young person is behaving this way for a reason and there may be issues at home or in school. They may disclose a concern or details of an incident to someone in the group. Treat them with sensitivity. Take any disclosure or concerns seriously and report to the DLP who should follow Let's Grow Together's internal reporting procedures if they have a serious concern about the young person's welfare.

#### Ways of reacting to challenging or disruptive behaviour

Follow through on agreed sanctions from the group contract. Some suggested sanctions:

- Taking a time out – this could be from a particular exercise or exercises;
- Finding a way for the young person to make amends e.g. if they broke something to replace it;
- Remind them of the benefits of CCFC and the consequences if their behaviour does not improve i.e. they will not participate in a trip or a specialist workshop. Refer them to the contract;
- If their behaviour continues to be seriously disruptive, the development worker may have to consider suspension from the group and even maybe expulsion. Expulsion should be a last resort as the group may be one of the few positives in a young person's life especially if they are having difficulties at home and/or school;
- CCFC should keep the lines of communication open with the young person even if they are excluded. They may gain some perspective during the time away and be willing to behave differently on re-admittance.

#### CCFC and Technologies

Young people need to be informed of the risks involved in using modern technologies. CCFC has an online presence in the shape of their own website or use a third-party site such as a page on a social networking site like Instagram. As part of their commitment to safeguarding the wellbeing of children and young people, CCFC has develop guidelines for safe use of such sites. Mobile phones are increasingly being used to communicate with members below are guidelines for their use in relation to CCFC.

## Working Online using Video Conferencing

### Tips for managing video meetings

- Do not require young people to have an account to participate, instead invite participants by email with a link to the meeting;
- Meetings should be hosted from an account held and managed by Let's Grow Together and not from a leader's personal account. More than one staff member or volunteer should have access to the account details;
- Ensure that meetings are password protected and can only be joined by invitees;
- Never invite anyone to join a meeting unless they are a member or leader with the group;
- It is not advisable to record the meeting. If you do record the meeting, store the recording securely on Let's Grow Together's equipment for a specified period of time. It is essential that you inform participants and their parents and guardians that you will be recording the meeting and get their permission to do so in line with Let's Grow Together's data protection policy, as this is classified as data processing;
- Make yourself familiar with the features of the chosen app in advance and provide clear guidance for children/young people on safe use of the app prior to working online;
- Time-limit meetings. As you would with a workshop/meeting be clear on the planned duration of the online interaction in advance. It is likely that the concentration span possible will be less than that in an in-person session;
- Be clear on the code of conduct for participants. Set expectations for dressing appropriately, participating fully and working together etc. Work with members to adapt the group contract to cover working online. This includes protocols around image sharing, recording, live streaming, taking screenshots etc, without consent of the group and knowledge of the facilitator;
- Check with children/young people that they are comfortable with using the app and whether they are experiencing any barriers to participation (e.g. no broadband access or access to equipment; a disability that impacts their ability to interact via screen such as visual impairment etc.) Make accommodations as appropriate;
- Reconsider working online if it leads to the significant exclusion of members.

### Informing parents and guardians of online workshops

- Review the parental permissions in place in respect of participants. Even if the existing permissions cover online communications and working, it is worth reviewing if this covers the downloading and use of apps that you may be using for online working;
- Seek consent and permission from parents regarding specific Video conferencing technologies (Zoom, Meet, WhatsApp etc) when completing the registration form;
- The digital age of consent is 16 so if working with anyone online under that age permission will especially need to be sought from a parent/ guardian for use of each individual app / social media site. However, it is best practice to have relevant parental permissions in place for all members aged 18 and younger. For information on the digital age of consent see <https://www.webwise.ie/news/gdpr-digital-age-consent/>

## Transport Arrangements

It can be difficult as a leader to find yourself in a situation whereby you are left with a young person who has not been collected or you are concerned that a young person may not get home safely. It is advised that adults use their common sense on such an occasion rather than having a blanket rule about lifts. It should be made clear to parents that if they are collecting their son/daughter and are

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delayed, that they need to ring and inform a leader. If a leader decides that the best thing is to give the young person a lift, they should ideally have another adult or failing that another young person in the car. They should inform the parent that they will be bringing their son/daughter home. If there are no other adults present, it is a good idea to inform another leader or maybe the Designated Person that they are giving a member a lift.

### **Trips Away from Home**

Participation in an exchange or training can be one of the most enjoyable and rewarding aspects of CCFC involvement both for children/young people and leaders. To be sure that such trips run smoothly it is important to adopt clear guidelines and to prepare properly in advance. Below are some points to consider:

- Leaders should be given a clear description of roles and responsibilities. When choosing leaders try to ensure you choose individuals who are comfortable with the level of responsibility and are equipped to react appropriately should an issue arise or an emergency occur. It is important to choose leaders that the group feel comfortable with and will approach should they have a concern. Ideally adult leaders should have received child protection and other relevant training. They should have completed the Garda Vetting process and have been recruited in line with the Let's Grow Together's Recruitment and Selection policy. Ideally the gender of the leaders should reflect the makeup of the group. A mixed group should have leaders of both genders;
- Give clear information about the trip to parents. Ensure that you have parental consent and contact details for all members aged under 18. Medical details such as allergies and medication should be requested. Parents should be requested to ensure that young people have an adequate supply of medication with them. It is a good idea to have home contact details for those over 18 just in case of an emergency. If members will be doing additional activities that involve some risk, permission should be sought;
- Parents/primary carers should be informed that in the event of an emergency that renders the young person unable to travel home with the group, they may have to travel to the location of the event/exchange;
- Agree group rules in advance with the members travelling and provide a copy to parents. It is strongly recommended that all trips be alcohol-free, regardless of whether over-18's are involved. It is important to recognise that there will probably be shared external/exchange rules and they will need to be followed. Members should be given clear information on which rules take precedence;
- If travelling abroad it is important that the leaders are familiar with relevant laws and customs of the destination country;
- Adhere to recommended ratio i.e. one leader to every eight young people plus allow an additional one adult for every ten young people. If the group is younger or some have special needs, you may decide to bring more leaders;
- Leaders should bring the Let's Grow Together's Incident/Accident Report forms with them. They should also be familiar with the Let's Grow Together's Welfare/Child Protection policy and have contact details for the Designated Person. They should adhere to Let's Grow Together's agreed reporting procedures should a child protection concern arise. They should also inform the organisers should an incident/accident arise as depending on the nature of the occurrence, it may be the responsibility of the organisers to deal with the situation or to remedy a health and safety issue;
- CCFC development worker should ensure that the trip is covered by Let's Grow Together's Insurance or if not that they take out adequate insurance for the trip. This is especially important for trips abroad;

- Ensure that the organisers of the exchange/training provide information such as local doctors and where the nearest hospital is;
- Ideally one of the leaders should be a competent first aider. Bring a well-stocked First Aid kit;
- It is recommended that there is discussion around the What if's..... of bringing a group away. For example, decide what would happen if a young person was taken to hospital. In this case it is recommended that one leader go with the young person and one leader remain with the group. Also, what would the process be if a young person was in serious violation of the group rules? For example, it might be decided that parents should come and collect the young person immediately. If so, this should probably be clearly stated on the parental consent form;
- There should be an on-call liaison person for the leaders. Someone who is on call should be able to provide the leaders need assistance or advice;
- Leaders should have access to money in case of an emergency;
- Leaders should be prepared to raise issues with the organisers. For example, if they feel the accommodation poses a health and safety concern;
- There needs to be a balance struck between the members' privacy and the necessity of supervision especially when they are in the accommodation. For example, leaders should always knock before entering a room.

## Communications

Let's Grow Together/CCFC is committed to ensuring all communications with young people are safe, respectful, appropriate, and professional.

CCFC is aware of the potential for such media to be used by those who would wish to exploit and harm young people and is committed to taking all reasonable measures to ensure all young people who are in receipt of communications are not put at risk of any harm.

## Telephone/mobile phone

- Staff should not provide members with their own personal mobile phone numbers. All communications via mobile phone should be on Let's Grow Together's mobile phone;
- Any phone communication with young people should only be used for the effective and efficient delivery of the CCFC programme;
- Access to phones that include members' contact details are controlled and restricted to those with a direct need to access them. Adults involved in CCFC should not have members' contact details on their own phone;
- CCFC does not provide young people's phone numbers to any third party unless there is a legitimate reason and the young person in question gives their permission. An example of this is where a member is being interviewed by a local newspaper. Parents/guardians must also give permission if a young person is under 18;
- If contacting young people by text message, \*group texts will be used instead of text messages to individuals. (see note on groups below);
- In a circumstance when it is necessary to send a text to an individual young person, the text should also be sent to the young person's parent/guardian;
- Copies of all text messages sent to young people should be retained;
- In the case of an emergency, where a young person cannot be located or if they are in danger of harm a staff may contact a young person on their personal phone;

- No images of members should be taken by staff on their personal phone. Images may be taken on the CCFC/Let's Grow Together's phone. Any such images should be managed in line with Let's Grow Together's Use of Images policy;
- Staff should never send any communication that could be interpreted as offensive or inappropriate;
- Let's Grow Together/CCFC requires that staff members be aware of the possibility of bullying via mobile phone, not only among young people participating in its programmes, but also the possibility that a staff member may use a mobile phone to bully a young person. [There is also a possibility that a young person may use a mobile phone to harass or target a staff member]. Any such occurrences will be taken seriously and should be reported to the DLP. All such instances will be managed in line with Let's Grow Together Anti-Bullying Policy;
- CCFC requires that all adults involved in the project be aware of the risk of abuse being carried out/initiated by mobile phone. Any member who has any concerns about a mobile phone communication received by a young person should follow Let's Grow Together's Internal Reporting Procedure;
- Staff Members should be aware that the sending of offensive or indecent material by mobile phone is treated very seriously under Irish Law.

### Group texts

While it is best to communicate with young people as a group, it is important to note that creating 'groups' on certain communication platforms such as What's App may cause a data protection issue. Some platforms (like What's App) make individual phone numbers visible to each group member - so members have access to each other's phone numbers. If this is the best form of communication for the group you must make everyone aware of this, and ask for permission from each member of the group. You must also offer an alternative communication method should members prefer - email, text message etc. No young person or parent should feel that the 'group' is the only option.

### Use of email

- Staff members should not use their own personal email account to communicate with young people. A dedicated CCFC/Let's Grow Together email account has been set up for this purpose;
- All email communications with young people should be professional, appropriate and respectful;
- Any email communication with young people should only be used for the effective and efficient delivery of the CCFC programme;
- Copies of emails sent to members are to be retained on the Let's Grow Together's email account(s);
- All emails should be CC'd to a Let's Grow Together email address and all replies to the email from members should sent Let's Grow Together email address;
- 'Joke' and 'circular' emails, even if they seem innocuous, should not be forwarded to members;
- Emails sent to and received from members should be retained on the Let's Grow Together email account;
- Let's Grow Together requires that all staff/volunteers be mindful of the possibility of email communications being used not only by a member to bully another member but also as a means for an adult to bully a young person or vice versa. Any such occurrence should be

taken seriously and reported to the DLP. All instances will be managed in line with our Anti-Bullying Policy;

- Email communications can be used as a means of abuse/initiating abuse. Any staff member who becomes aware of any suspicious communication, should follow Let's Grow Together's Internal Reporting Procedure.

## **Use of Images**

Let's Grow Together is conscious of the responsibility it has for ensuring any images/video footage of children/young people are used in a safe and responsible manner that does not put any young person at risk. Photographs and visual images are regarded as personal data under the *Data Protection Acts 1998/2003*. Therefore, all images must be obtained fairly and used only for one or more specified legal purpose.

We have developed the following policy on use of images/footage, images/videos of young people will only be recorded if there is a valid reason relating to Let's Grow Together and its supported initiatives:

- Consent for the use of images/footage is sought from participant and from the parents/guardians where a participant is under 18;
- A refusal of permission will not restrict the participation of a child or young person;
- No images should be taken by staff members with their own mobile phone;
- Participants and guardians are informed in advance as to the specific uses of any images/video (e.g. promotional and archival purposes) and as to whether they will be provided to third parties. We will only use images/footage for the reasons specified;
- Care will be taken that children/young people whose images are captured are dressed in a way that is appropriate to their age;
- Every precaution will be taken to ensure no image/footage used will expose any member to embarrassment or distress;
- We only provide images/video footage to reputable third parties when there is a legitimate reason for doing so e.g. distributing images to the media when promoting a production. We may also share images with funders when requested to do so;
- We will only identify/provide names of individual young people to third parties in a situation where they are being publicly acknowledged. Parental consent will be sought before providing any details of a young person aged under 18;
- When using images/video Let's Grow Together will not provide information that could be used to make contact with a child or young person;
- Images/video will only be used in the context in which they were captured;
- Information such as date taken, names, context of images, and whether consent was provided will be stored with images that are retained;
- We will be particularly sensitive when using images of children/young people whom we are aware are vulnerable and/or have additional needs;
- Any misuse of images/footage should be reported to the DLP as soon as possible;
- If any individual is unhappy with the manner an image/footage is obtained, used or retained Let's Grow Together, they should follow our Complaints Procedure;
- Any such complaint will be taken very seriously and procedures will be followed in full;
- It will be made clear to children and young people that there are situations when it is inappropriate to capture photos/footage of each other. During the drafting of the group contract, young people will be made aware of safe capturing and use of images. It will be

made clear to them that they need to think carefully before they post an image where it can be viewed by others and should not take images out of context. They will be reminded there are unscrupulous individuals who might use images to identify young people and may seek to make contact with them;

- Staff members should be alert to the possibility of members capturing and distributing images with a view to causing another young person embarrassment or upset. Participants will be informed that any such occurrence will be taken extremely seriously and will be treated as an instance of bullying. Depending on the circumstances, it may be treated as a child protection issue and a report may be made to the statutory authorities.

### **Use of Images/Footage on the Internet**

The posting of images/footage on the Internet is an area of particular risk and Let's Grow Together is cognisant of the possibility of images and video being used and manipulated by those who seek to harm children and young people and the danger of any information provided being used to contact a young person with a view to grooming them for abuse.

Let's Grow Together takes the following steps for the use of images/footage on the Internet:

- Particular care will be taken when posting such content on the Internet that it is appropriate, does not provide any information that could be used to contact or locate a young person and does not put a young person at risk in any other way;
- While it is impossible to completely control use of images once they are posted to the internet, we request that all users of our own website and any third party sites on which we have a presence adhere to the following, taken from our usage policy:
  - Do not use any content including images from the site without receiving permission from Let's Grow Together;
  - Do not misuse or take out of context any content on the site including images or video footage;
  - Do not tag children/young people;
  - Any comments added should be respectful and not targeted at any particular young person;
  - Do not add comments to photos that may identify young people in the photo.

### **Legislation and the Internet**

Let's Grow Together is aware that there is legislation in Ireland that has relevance to misuse of the Internet such as the *Criminal Law (Sexual Offences) (Amendment) Act 2007*, the *Non-Fatal Offences Against the Person Act (1997)* and the *Child Trafficking and Pornography Act 1998*. We will make a report to the statutory authorities if there is a criminal dimension to any misuse that relates to the CCFC's internet presence.

## **Section 6. Relevant Legislation**

Details on relevant legislation available in Appendix 4.

**Child Protection Children Act 2001**

**Child Care Act 1991**

**Criminal Justice Act 2006**

**Domestic Violence Act 1996**

**Protections for Persons Reporting Child Abuse Act 1998**

**Data Protection Acts 1988 and 2003**

**Education Act 1998**

**Education (Welfare) Act 2000**

**Non-Fatal Offences against the Person Act 1997**

**Freedom of Information Acts 1997 and 2003**

**Criminal Law (Sexual Offences) (Amendment) Act 2007**

**Child Trafficking and Pornography Act 1998**

**Safety, Health and Welfare at Work Act 2005**

## Appendices

1. [Tusla Child Safeguarding Policy](#)
2. Internal Reporting Form
3. [Data Protection Policy & Procedure](#)
4. [Child protection legislation](#)