

# SAFEGUARDING POLICY 2024



## The Irish Pilgrimage Trust

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**PART I: INTRODUCTION**

**1. INTRODUCTION TO SAFEGUARDING POLICY AND PROCEDURES****SAFEGUARDING POLICY**

This Policy and Procedures Document is based on the Standards and Guidance of the National Board for Safeguarding Children in the Catholic Church in Ireland and is compliant with The Children First Act 2015: Children First National Guidelines for the Protection and Welfare of Children 2017. The Policy also references the Health Service Executive (HSE) "Safeguarding Vulnerable Persons at Risk of Abuse, National Policy & Procedures" The Irish Pilgrimage Trust (the Trust) also complies with the rules and regulations that pertain in the Northern Ireland jurisdiction.

This document has been developed in consultation with group leaders, trustees, parents, staff, carers and volunteers who support the Trust in safeguarding children and vulnerable adults.

All individuals who work with and for the Trust, must adhere to these policies and procedures in all Trust activities and must act at all times to create safe environments for our guests and ensure that all concerns are responded to appropriately.

I would like to acknowledge the many people within the Trust who worked to develop this policy document.

David Whitty  
Trust Chairperson

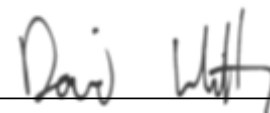
**The Irish Pilgrimage Trust****2. SAFEGUARDING POLICY STATEMENT**

The Irish Pilgrimage Trust is committed to best practice, which protects children and vulnerable adults who participate in Trust activities. Staff, trustees, carers and volunteers in the Trust accept and recognise our responsibilities to develop awareness of the issues which cause children/vulnerable adults harm.

These responsibilities include:

- Treating children/vulnerable adults with respect at all times.
- Ensuring that children/vulnerable adults will be listened to and heard.
- Sharing information about child safeguarding and good practice with children/vulnerable adults, parents guardians, staff, carers and volunteers.
- Sharing information about concerns with the relevant agencies and involving parents / guardians and children appropriately.
- Carefully following the procedures for recruitment, training and management of staff, carers and volunteers.
- Being committed to reviewing and evaluating our policy and procedures on an ongoing basis.
- Adopting best practice in accordance with the standards named in the National Board for Safeguarding Children in the Catholic Church in Ireland Standards and Guidance Document.
- It is mandatory that all members of the Trust read and are familiar with the Trust Safeguarding Policy. - See [www.irishpilgrimagestrust.com](http://www.irishpilgrimagestrust.com) or contact the Trust office for a copy.
- All group leaders will discuss Trust Safeguarding Policy with carers and must ensure that all carers sign confirmation that they have read and understood the Trust Safeguarding Policy.

Signed:

  
**David Whitty**, Chairperson, Board of Trustees

Date:

13th January 2024

### 3. DEFINITION OF CHILD AND VULNERABLE ADULT

#### DEFINITION OF A CHILD

(From Child Care Act 1991 & Children First 2015)

A child means a person under the age of 18 years other than a person who is or has been married.

#### DEFINITION OF VULNERABLE ADULT

(As defined in The Irish Pilgrimage Trust's Code of Practice in relation to guests travelling with the Trust)

A Vulnerable Adult is a person aged 18 years or older who, by reason of their disability, age or illness is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

#### Note: Definition of Guest

(As defined in the Trust's Code of Practice in relation to a guest who travels with the Trust)

A person with additional needs who is invited by the Trust and avails of the opportunity to accompany one of the Trust groups on the annual Easter Lourdes Pilgrimage, Friendship Week short summer break, annual Hosanna House Pilgrimage or other such event organised by the Trust.

### 4. Objects, Mission, Vision and Values

#### The Irish Pilgrimage Trust

#### Objects, Mission, Vision and Values

##### Objects

We bring people with additional needs on pilgrimage holidays to Lourdes and on holiday in Ireland and we fundraise to cover their costs

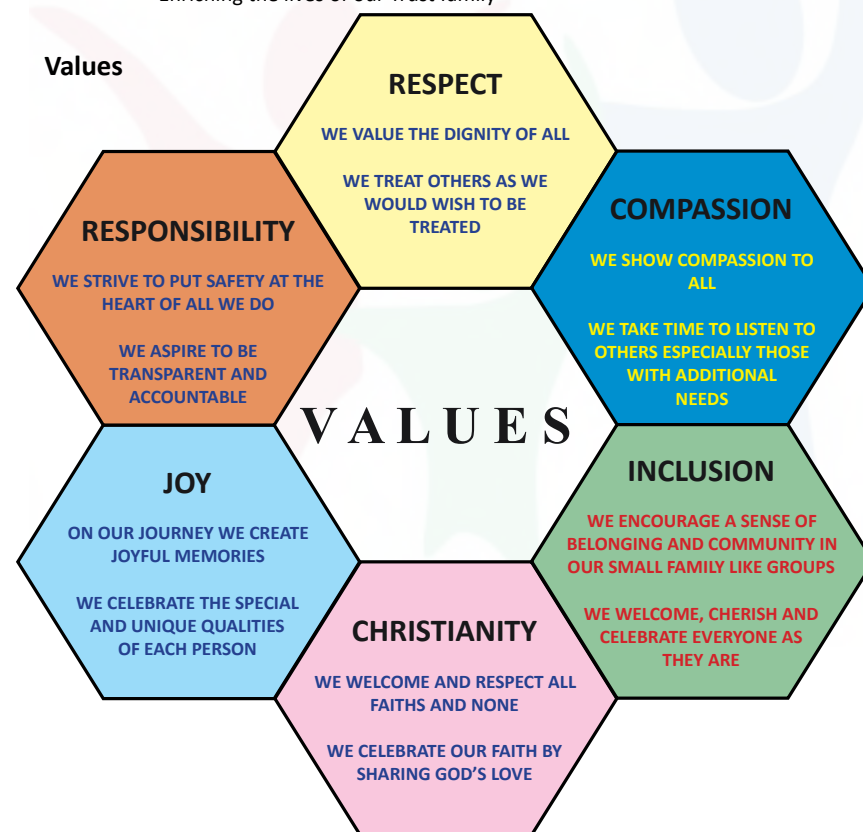
##### Mission

The Irish Pilgrimage Trust is a voluntary, Christian and charitable organisation that provides the opportunity for people with additional needs to go on volunteer supported pilgrimages and holidays to Lourdes and in Ireland. Our aim is to cherish the uniqueness of each person through sharing the gift of God's love with joy.

##### Vision

Enriching the lives of our Trust family

##### Values



## **The Irish Pilgrimage Trust**

### **5. SAFEGUARDING POLICY SUMMARY**

***This summary of The Irish Pilgrimage Trust's safeguarding policy outlines the procedures for the protection and safeguarding of children and vulnerable adults.***

#### **Responding to child / vulnerable adult safeguarding allegations and suspicions:**

Children/vulnerable adults have a right to be listened to and heard. Any person who suspects that a child/vulnerable adult is being abused or is at risk of being abused should report their concerns to the Statutory Authorities in the relevant jurisdiction. If the concern or complaint is about Trust personnel they must contact the Designated Liaison Person for the Trust.

#### **Preventing Harm to children/vulnerable adults:**

The Trust Safe Recruitment and Vetting Procedures will be strictly adhered to by all those involved in recruitment processes within the Trust. An appropriate and comprehensive code of behaviour as outlined in the policy will be adhered to during all Trust activities.

#### **Training and Education:**

In order to maintain high standards and good practice, all Trust staff and carers who work with our guests will have induction training by trained personnel within the Trust or designated by the Trust based on our policy. Existing carers and staff will be expected to meet all the training requirements. Refresher training will be delivered regularly to ensure compliance with updated policy and procedures. The Trust may use IT based programmes to deliver these training modules.

#### **Communicating the Trust's safeguarding message:**

This summary will be displayed prominently in Premises used by the Trust. All Trust staff and carers involved in activities will receive a copy of the full

policy document and must comply with same.

1. A Safeguarding Information leaflet will be given to parents / guardians containing key points of the policy.
2. Safeguarding will be on the agenda of all Trust meetings.
3. The name and photograph of the DLP will be displayed on Trust Premises and website

#### **Access to advice and support:**

Those who have suffered abuse will be offered a compassionate and just response with appropriate pastoral care to help them rebuild their lives.

#### **Implementing and monitoring the policy:**

To ensure children/vulnerable adults are kept safe, this policy, procedures and guidelines will be implemented across all regions of the Trust. Regular checks and audits will be carried out to ensure compliance with the safeguarding policy and procedures.

## 6. SAFEGUARDING PERSONNEL

**David Whitty:** Chairperson, Board of Trustees

**Bernadette Connolly:** National Coordinator / DLP

**Eadaoin McAnulty:** National Safeguarding Officer

### Support Personnel

Dr John Porteous: Trust Doctor

Eileen Doyle: Trust Nurse

Rev Michael Murphy: Trust Chaplain

### Vetting Committee

- Establish and maintain safe and effective recruitment and vetting procedures
- Periodically audit the operation of the policies and procedures
- Advise on relevant issues arising

**In the situation whereby a vetting form is returned from the Garda Vetting Office or from Northern Ireland or the UK indicating a possible reason as to why it may be unsafe for the person to volunteer, the vetting committee will make a decision on this matter.**

### VETTING COMMITTEE:

James Foley, Trustee

Dr. John Porteous: Trust Doctor

Bernadette Connolly: Trust National Coordinator

Caitriona Cannon, Trustee.

## 7. ROLES AND RESPONSIBILITIES

### DESIGNATED LIAISON PERSON (DLP)

The DLP is responsible for ensuring that reporting procedures are followed, so that child welfare and protection concerns are referred promptly to relevant Statutory Authorities.

While mandated persons have statutory obligations to report mandated concerns, they may make a report jointly with another person, whether the other person is a mandated person or not. In effect, this means that a mandated person can make a joint report with a DLP.

*Children First: National Guidance for the Protection and Welfare of Children 2017—Chapter 4, pgs. 35 & 36*

Children First: National Guidance for the Protection and Welfare of Children 2017 recommends that all organisations providing services to children should consider appointing a designated liaison person. This is not, however, a statutory obligation under the Children First Act 2015.

### Safeguarding Officer

It is the role of the Safeguarding Officer to ensure the implementation and monitoring of the Trust's Safeguarding Policy and Procedures Document.

## **PART II: CREATING AND MAINTAINING SAFE ENVIRONMENTS**

## 8. RECRUITMENT POLICY

The Irish pilgrimage Trust will ensure best practice in the recruitment of staff and volunteers. Those working within the Trust either in a paid or voluntary capacity must be recruited safely and must be suitable for their position/role within the Trust.

### Group Leader

To be appointed a group leader, a person must:

- Have at least two years experience as a carer within the Trust
- Be vetted and have references checked.
- Be nominated at a regional meeting and the nomination approved at the meeting.
- This must be recorded in the minutes of the meeting.
- Be interviewed by the regional chairperson and a trustee as to their suitability, experience and commitment to the role of group leader.
- In the event of a regional chairperson being nominated as a group leader, the nominee will be interviewed by two trustees.
- Be approved at the earliest possible meeting of the Board of Trustees and the approval duly noted in the minutes.
- On appointment attend a new group leader training programme and other such training as required by the Trust.
- Attend designated meetings as prescribed by the Board of Trustees.

### Carer

- Participate fully with the vetting process of the Trust in the relevant jurisdictions within which the Trust operates.
- Complete a Volunteer Application Form and Supply the necessary references as required by the Trust.
- Fulfil any Trust requirements in relation to both the Code of Practice and the Safeguarding Policy.
- Read, sign and adhere to the Volunteer's Code of Conduct.

### Staff

Applicants will:

- Provide proof of identification
- Agree to abide by the Trust's vetting process and provide any necessary documentation required by the Trust.
- Submit the names of two referees from whom references will be sought.
- Be interviewed by a gender balanced interview board with no less than three interviewers.
- It is within the powers of the Board of Trustees to delegate the initial stages of the recruitment process to a reputable outside recruitment agency.

## 9. PREVENTING HARM TO CHILDREN

Group Leaders and Carers who oversee activities with children and vulnerable adults in the Trust will ensure procedures outlined in this section of the policy are implemented. In particular they will ensure that the following basic guidelines are followed within their group.

- Application forms and parental consent forms must be obtained for all guests before they participate in Trust activities.
  - Unsupervised one to one contact is prohibited.
  - The opinion of our guests will be listened to and valued and they will be consulted where possible, regarding matters that affect them.
  - Parents/Guardians and guests will be informed about our Code of Practice, our Safeguarding Policy and all necessary procedures and advised about whom they can talk to if they wish to make a complaint.
  - Guests will be asked to adhere to the Code of Conduct for Guests as set out on page 31.
  - The Group Leader will ensure that the correct procedures are followed in relation to the issues below as well as ensuring that the correct policy is implemented as appropriate to the needs of their group.
- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Safeguarding Guidelines</li> <li>• Codes of Behaviour</li> <li>• Intimate Care Procedures</li> <li>• Room Sharing</li> <li>• Information Technology</li> <li>• Social Media</li> </ul> | <ul style="list-style-type: none"> <li>• Photography</li> <li>• Challenging Behaviour</li> <li>• Anti-Bullying</li> <li>• Risk Assessment</li> <li>• Incidents &amp; Accidents</li> <li>• Complaints</li> </ul> |
|---|---|

## 10. INTIMATE CARE POLICY

Intimate Care for the purpose of this document is defined as: any care which involves washing, touching or carrying out an invasive procedure to personal areas.

The issue of intimate care is a sensitive one and requires everyone involved being respectful of the child's/vulnerable adult's needs. The person's dignity should always be preserved with a high level of privacy, choice and control. There should always be a high level of awareness of safeguarding issues, with behaviour being open to scrutiny and undertaken in partnership with parents / guardians and with the person.

By its nature the Trust through its various activities works closely with guests who may have physical disabilities and additional care needs. The provision of intimate care must always be carefully planned by the group leader, group nurse and the carers assigned to the guests' care needs. This must be done in consultation with the guests and their parents/guardians. In the case where the person is in the care of the HSE, the guest's social worker needs to be part of the planning.

It is Trust policy that no carer should work alone with a guest; there must always be a minimum of two carers present. Similarly when accompanying a guest to the bathroom, a minimum of two carers must always be present.

Ideally there will be a rota of carers which is aimed at ensuring that over familiar relationships are discouraged from developing, whilst at the same time guarding against the care being carried out by a succession of completely different carers. The concept of never do for our guests what they can do for themselves must always be borne in mind.

## 11. STEPS TO STOP AND PREVENT BULLYING

Whether you are a group Leader, carer, and friend or family member, there are a number of steps you can take to stop and prevent bullying:

1. **Pay Attention.** There are many warning signs that may point to a bullying problem, such as unexplained injuries, lost or destroyed personal items, changes in eating habits, and avoidance of social situations.
2. **Don't ignore it.** Never assume that a situation is harmless teasing. People have different levels of coping; what may be considered teasing to one may be devastating to another. Whenever a person feels threatened in any way, take it seriously, and assure the person you are there for them and will help.
3. **When you see something—do something.** Intervene as soon as you even think there may be a problem. Don't brush it off as "kids are just being kids. They'll get over it. Some never do, and it affects them for a lifetime. All questionable behaviour should be addressed immediately to keep a situation from escalating. Summon other carers if you deem the situation may get out of hand.
4. **Remain calm.** When you intervene, refuse to argue with either person. Model the respectful behaviour you would expect from people. First make sure everyone is safe and that no one needs medical attention. Reassure the people involved, as well as the bystanders. Explain to them what needs to happen next—bystanders go on to their destinations while those involved in the incident are taken to a safe place.
5. **Deal with the people involved individually.** Don't attempt to sort out the facts while everyone is present, don't allow the people to talk to one another, and don't ask bystanders to tell what they saw in front of others. Instead, talk with the individuals involved—including bystanders—on a one to one basis. This way, everyone will be able to tell their side of the story without worrying about what others may think or say.
6. **Be aware of the fact that some of our guests may not have the verbal skills** to explain what has happened and persistent

questioning may add further to their distress.

7. **Don't make the young people involved apologise and/or shake hands on the spot.** Label the behaviour as bullying. Explain that you take this seriously and that you will get to the bottom of it before you determine what will happen next. This empowers the bullied young person to feel that someone will finally listen to their concerns and be fair about outcomes.
8. **Bystanders provide bullies an audience, and often encourage bullying.** Explain that this type of behaviour is wrong, will not be tolerated, and they also have a right and a responsibility to stop this type of behaviour.
9. **Listen and don't pre-judge.** It is very possible that the person you suspect to be the bully may actually be the bullied young person retaliating. Rather than make any assumptions listen to each young person with an open mind.

Incidents of bullying must be recorded and reported initially to the National Coordinator.

Websites:

[www.stopthebully.ie](http://www.stopthebully.ie)  
[www.sticksandstones.ie](http://www.sticksandstones.ie)  
[www.yourhealth.ie](http://www.yourhealth.ie)

## 12. CHALLENGING BEHAVIOUR

Some of our guests are dealing with complex issues which can lead to them acting out in negative ways that are challenging for group leaders, carers and other guests around them. We as a Trust must be sensitive to their needs and remember that safeguarding is much broader than recognising, responding and reporting abuse but also about ensuring that our guests have the help and support they need to deal with stressful situations.

***It is important that each group leader makes the guests aware, irrespective of age, of the Trust's Code of Behaviour for Guests.***

As group leaders and carers dealing with challenging behaviour it is of paramount importance that people are safe. No two challenging behaviour situations will be the same, however the following guidelines may be of help.

- Where possible calm the situation before it escalates.
- Remain calm even though you may not feel calm.
- Be conscious of the body language you are portraying. Is it aggressive without you meaning it to be.
- Speak calmly and be conscious of your tone of voice.
- Use their name and don't patronise.
- Give them a choice e.g. "you can take a time out, maybe you would like to ring home John or we can go for a walk to see if we can sort this out". You are empowering them by giving them options.
- The more confined the space the more likely the situation is to escalate, give them space.
- Remove the other guests to a safe place as an "audience" may escalate the situation.
- Do not use physical restraint as this requires specific training and both you and the young person could be hurt.
- Get a carer to call for help if you feel you are losing control of the situation. The Trust has access to a number of carers who have expertise in this area. Err on the side of caution.

- When calm is restored, build bridges as the young person may feel very low after the situation. It is also the time they will learn most and asking the question 'If they had their time back what would they do differently in the situation?' can be of value to them.
- Discuss the situation with head office as it may be necessary to inform the young person's parents.
- In extreme situations it may be necessary to remove the young person from the group. This will only be done in consultation with the Chairperson, National Coordinator and Trust Doctor.

**Always record and report the incident to head office**

### 13. ROOM SHARING POLICY

*Version 19th November 2022*

The following is a policy statement on room sharing arrangements for the guests and carers of The Irish Pilgrimage Trust. This policy applies for the annual pilgrimages to Lourdes/Hosanna House and friendship weeks to Kilcuan/Cois Cuain.

The Trust takes cognisance of the following when issuing this policy.

The variety of accommodation available to various groups.

It acknowledges the fact that groups are restricted in many cases by the accommodation available to them.

It acknowledges the wishes of parents in relation to room arrangements.

It acknowledges that the Trust has a duty to protect both our guests and our carers.

It is The Irish Pilgrimage Trust's policy that guests and carers do not share rooms.

#### 1.0 General Principles

- 1.1 The overriding principle is to ensure that all pilgrims are safe at all times.
- 1.2 The Group Leader must use her/his best judgement, based on information received, when allocating carers and guests to their rooms.
- 1.3 The room sharing arrangements must be organised in such a way as to provide the best safety to both guests and carers given the accommodation layout available in that particular hotel.
- 1.4 A record must be kept of what room each guest and carer occupied during the week and this must be returned to HQ in the Safety Matters and Forms Booklet.
- 1.5 If a Group Leader is uncertain about how to implement these procedures for a given set of circumstances, they should contact either the National Coordinator or Chairperson.

- 1.6 It is important that Group Leaders and Carers be aware and alert to the possibility of guests bullying or intimidating other guests. Any such instances should be reported to the Group Leader and recorded on an incident form.
- 1.7 When selecting the guests for the group, the Group Leader should bear in mind the layout of their particular hotel and the mix and skills of the carers. If the group is not expecting to have additional carers (doctor, cyclist, students) the Group Leader may have to change the carer/guest ratio to ensure the guests can be fully cared for at all times during their time away.
- 1.8 When making a pre-Lourdes home visit the room sharing arrangements should be explained to the parents/guardians.

#### 2.0 Room Arrangements

- 2.1 It is Trust policy that no carer should share a room with a guest
- 2.2 Under no circumstances should a carer put themselves in a situation where they are alone with a guest but should the situation arise whereby a helper unintentionally finds himself/herself alone in a room with a guest, a record must be made as soon as practicable of the date, time, reasons and duration spent alone. The Group Leader must be informed and he/she must record this on an incident form.
- 2.3 If an extra bed is brought into a two or three-bedded room, the risk assessment should confirm that this has not compromised health and safety standards.
- 2.4 Group Leader should ensure suitable matching of age, physical and learning abilities.
- 2.5 There should be only one fulltime wheelchair user per room where practicable.
- 2.6 The Group Leader, in conjunction with the carers, should establish appropriate night supervision that involves 2 (two) carers being on duty for the duration of the whole

night. The Group Leader should ensure that they have adequate carers to facilitate supervision and that all carers are fully aware of their involvement.

- 2.7 For night supervision the following is recommended:
- There should be four carers on night-duty operating a rota system whereby two carers are “on duty” and two carers are “on stand-by”.
  - The carers should comprise two female and two male carers (except in an all-male or all female group).
  - Group Leader/carers should inform the guests who is on night duty each night.
  - Detailed planning is required to ensure there are enough carers available during the day to cover for the carers involved in night duty.
- 2.8 Room Occupancy forms must be completed and returned to HQ.
- 2.9 Student carers aged under 18 years must not share with adults or guests.
- 2.10 A student carer aged under 18 years may share with another student carer aged over 18 years in circumstances where they:
- Have the permission of the Trust Chairperson
  - Have written consent from the parents/guardians of the student carer who is under 18 years.
- 2.11 Parents/guardians who are travelling with their children may share a room with their children.
- 2.12 Guests aged under 18 years must not share with guests over 18.
- 2.13 Any further exceptions must be approved by the Board of Trustees.

## **14. MOBILE DEVICES POLICY**

The exponential growth in social media and the widespread availability of smart phones and other mobile devices over the past few years has opened up significant new opportunities for people of all ages to communicate and to share information with one another. However, the benefits that this new form of communication brings must also be balanced with the significant risks that are attendant to it. While The Code of Practice describes the circumstances in which mobile devices and social media may be used, it is within the remit of a group leader to further reduce (or prohibit) the use of mobile phones and social media by guests or carers in their groups should they so wish. If any usage of a mobile device or social media is not expressly covered in this document, it should be considered to be forbidden by the Trust.

At all times, the use of social media, the taking of photographs and the recording of video should respect the dignity of the young people under our care.

### **Mobile device and social media policy for guests**

Many parents of the young people that we bring on pilgrimage to Lourdes value the ability to easily contact their child, and therefore the Trust does not prohibit our guests from bringing mobile devices with them on pilgrimage. However, the Trust has strict policies on the circumstances in which guests may use the mobile devices that they bring with them, and how such devices may be used.

### **Voice calls and instant messaging apps**

Guests may only make and receive voice calls or send and receive text messages on their mobile devices if given permission by the group leader. In order to encourage group interaction, group leaders may restrict the times of day at which such voice calls or text messages may be made. Voice calls and instant messages should only be sent and received when

the guest is with the rest of group, and such use is forbidden in hotel bedrooms.

### **Photography**

Guests are forbidden from taking photographs of themselves or other guests or carers in hotel bedrooms. At any other time, photographs of any member of the group (or other groups) may be taken only with express permission of the group leader. The HSE prohibits the taking of photographs of guests who are in the care of HSE.

### **Social media**

Guests are forbidden from using social media in hotel bedrooms, and may only be used in other circumstances if given express permission by the group leader. Guests are forbidden from sharing any photographs or videos taken while on the pilgrimage on social media unless given express permission by the group leader to do so.

### **Mobile device and social media policy for carers**

Carers must respect the dignity of the young people under our care, and take into account the best interests of the Trust when using mobile devices or social media while on pilgrimage. Carers must follow the direction of the group leader on the use of social media and mobile devices, should the group leader in question wish to restrict further their use in their particular group. It is recommended that you do not give your personal contact details to guests.

## **15. CODE OF BEHAVIOUR FOR CARERS AND STAFF**

The standards of good behaviour outlined within this document apply to all carers, staff and volunteers within the Trust. This code of behaviour outlines what is acceptable and non-acceptable behaviour. ***This policy exists for the protection of guests, carers and staff.***

### **General Guidelines**

1. Always treat each guest and fellow carers with dignity and respect.
2. Be conscious of the fact that you are a role model and an ambassador for the Trust.
3. Never use language, make suggestions or offer advice which is inappropriate, offensive or abusive.
4. A core element of the ethos of the Trust is inclusion.
5. Be conscious of the fact that we work with adults who have physical disabilities but don't necessarily have cognitive difficulties and must be treated and spoken to accordingly.
6. Never allow our guests and carers to use inappropriate language unchallenged.
7. Always challenge and report potentially abusive behaviour.
8. Never act in ways intended to shame, humiliate, belittle or degrade.
9. Never let allegations a child makes go without being addressed and recorded.
10. Favouritism is not acceptable, so be sensitive to the possibility of becoming overly involved or spending a disproportionate time with any individual or group of children. All are to be valued equally.
11. Under no circumstances give alcohol, tobacco or illegal substances to guests under 18 years of age.
12. Use only age appropriate media products and activities in working with children and young people.
13. Sexually explicit or pornographic material is never appropriate and should not be shown to children/young people.
14. Comments and jokes of a sexual nature which may give offence or could be interpreted as inappropriate are to be avoided.
15. Never hit or otherwise physically assault or abuse a child.

16. Never behave in a manner which could be seen as inappropriate or sexually exploitative.
17. Never do things of a personal nature for children and young people, which they can do for themselves.
18. Develop a culture where our guests can talk openly with our carers and ensure each guest knows what they can do if they feel there is a problem.
19. Do not engage in or tolerate any behaviour – verbal, emotional, psychological or physical that may be construed as bullying.
20. Never discriminate against or treat guests differently on the grounds of marital status, family status, age, race, religion, disability, sexual orientation, membership of traveller community, culture, political affiliation and/or views. Such behaviour is not acceptable.
21. It is incumbent upon all carers not to engage in activities that would impair their ability to function fully as a carer.

## **16. CODE OF CONDUCT FOR GUESTS**

1. Each person treats everybody with courtesy and respect.
2. No one has permission to leave the group or hotel unless they have the permission of the group leader and are accompanied by two adult carers.
3. All our guests are expected to participate fully in all the group activities organised by the group leader.
4. Guests are not allowed to enter the rooms of other guests.
5. Guests are forbidden from purchasing any of the following: fireworks, knives or any such item which would present a risk to others.
6. Identification must be worn at all times.
7. The use of cameras/mobile camera phones/media devices is forbidden at all times in the guest's bedrooms and bathrooms. Please discuss the use of mobile phones/media devices with the group leader.
8. The taking of unauthorised substances is forbidden and the consumption of alcohol by guests under 18 years is forbidden.

## 17. SECOND LEVEL STUDENT CARERS — Role and Responsibilities

The Trust values highly the involvement of second level students in caring for guests either during the Trust pilgrimages to Lourdes, Hosanna House and during Friendship Weeks.

All second level students must operate within the following rules and group leaders must also follow these rules in relation to the second level students in their group:

1. Students must be at least 16 years old at least one month before travelling on the pilgrimage or Friendship Week, to facilitate vetting.
2. Students and their parent/guardian must sign and adhere to “Guidelines / Rules for 2nd Level Student” as outlined on the volunteer form.
3. Students will be supernumerary to the group.
4. Students cannot be allocated to night duty. Embedded students can be asked to assist in watching a corridor/number of guest rooms early in the morning when other carers are busy getting guests ready for the day.
5. Students will assist in caring for the guests in their group but will not have responsibility for the care of any particular guest.
6. Students should make a concerted effort to interact with all Guests within the group and use their skills and talents to contribute to group activities i.e. singing, dancing, sports, arts & crafts etc.
7. Student must attend their group pre pilgrimage meeting and other meetings arranged by the student leaders and group leader.
8. The student must report all incidents or accidents to the Group Leader or Group Nurse, no matter how minor.
9. Students must show respect at all times to all members of the group.
10. Student carers must conduct themselves in an appropriate manner at all times.
11. Students are encouraged to fundraise for the Trust with all proceeds being lodged to the Relevant Trust Regional Bank Account.
12. Students can fundraise for their own fare within their schools.
13. Student carers must complete the Trust’s on-line Safeguarding Training Programme as required by the Board.

## 18. TRAINING AND EDUCATION

Trust personnel including staff, carers, trustees, regional officers and group leaders will be offered training in child safeguarding to maintain high standards and good practice. The level of training required by various personnel will be determined by the Board of Trustees in consultation with the Safeguarding Officer.

The Safeguarding Officer will coordinate the provision of Safeguarding Training. Appropriately qualified and registered training officers will deliver appropriate training approved by the National Board for Safeguarding Children in the Catholic Church in Ireland.

The training may take the form of:

Face to face training

*or*

Online Training

And other such delivery modes that are required from time to time as decided by the Board of Trustees.

## **19. IMPLEMENTING AND MONITORING THE POLICY**

The Trust will review its safeguarding policy on a yearly basis.

The Board of Trustees will appoint a Safeguarding Officer to monitor its Safeguarding Policy and all policies related to safeguarding.

It is the role of the Safeguarding Officer to ensure the implementation of the Safeguarding Policies.

The Safeguarding Officer will prepare an annual safeguarding report for the Board of Trustees in which he/she will highlight any deficiencies in the safeguarding policy and will recommend any necessary changes.

The Board of Trustees will appoint a Designated Liaison Person from within the Trust.

The Trust will adhere to the guidelines of the National Board for Safeguarding Children in the Catholic Church in Ireland. (NBSCCCI)

## **PART III: PROCEDURES FOR RESPONDING TO CHILD PROTECTION CONCERNS**

## 20. RECOGNISING CHILD ABUSE

### Child Abuse Categories

- Neglect
- Emotional Abuse
- Physical Abuse
- Sexual Abuse
- Circumstances which may make children more vulnerable to harm
- Bullying

### Neglect (ROI)

Neglect is defined as ‘to deprive a child of adequate food, warmth, clothing, hygiene, supervision, safety or medical care’. The threshold of harm, at which you must report to Tusla under the Children First Act 2015, is reached when you know, believe or have reasonable grounds to suspect that a child’s needs have been neglected, are being neglected, or are at risk of being neglected to the point where **the child’s health, development or welfare have been or are being seriously affected, or are likely to be seriously affected.**

*Children First: National Guidance for the Protection and Welfare of Children, 2017—pg 21.*

### Neglect (NI)

**Neglect** is the failure to provide for a child’s basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter that is likely to result in the serious impairment of a child’s health or development. Children who are neglected often also suffer from other types of abuse. *Co-operating to Safeguard Children and Young People in Northern Ireland, 2.6, pg 14*

### Indicators of Neglect

#### Child neglect should be suspected in cases of:

- Children being left alone without adequate care and supervision
- Malnourishment, lacking food, unsuitable food or erratic feeding
- Non-organic failure to thrive, i.e. a child not gaining weight due not only to malnutrition but also emotional deprivation
- Failure to provide adequate care for the child’s medical and developmental needs, including intellectual stimulation
- Inadequate living conditions – unhygienic conditions, environmental issues, including lack of adequate heating and furniture
- Lack of adequate clothing
- Inattention to basic hygiene
- Lack of protection and exposure to danger, including moral danger, or lack of supervision appropriate to the child’s age
- Persistent failure to attend school
- Abandonment or desertion

*Children First: National Guidance for the Protection and Welfare of Children, 2017— Chapter 2, pg. 08.*

### Emotional Abuse (ROI)

Emotional abuse is the systematic emotional or psychological ill-treatment of a child as part of the overall relationship between a caregiver and a child. Abuse occurs when a child’s basic need for attention, affection, approval, consistency and security are not met, due to incapacity or indifference from their parent or caregiver. Emotional abuse can also occur when adults responsible for taking care of children are unaware of and unable (for a range of reasons) to meet their children’s emotional and developmental needs. Emotional abuse is not easy to recognise because the effects are not easily seen.

*Children First: National Guidance for the Protection and Welfare of Children, 2017— Chapter 2, pg. 08.*

**Emotional Abuse (NI)**

**Emotional Abuse** is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development.

*Co-operating to Safeguard Children and Young people in Northern Ireland, 2.6, pg. 14*

**Indicators of Emotional Abuse (ROI)**

A child may show signs of emotional abuse through their actions or emotions in several ways. These include insecure attachment, unhappiness, low self-esteem, educational and developmental underachievement, risk taking and aggressive behaviour.

It should be noted that no one indicator is conclusive evidence of emotional abuse. Emotional abuse is more likely to impact negatively on a child where it is persistent over time and where there is a lack of other protective factors.

*Children First: National Guidance for the Protection and Welfare of Children, 2017— Chapter 2, pg. 09.*

**Physical Abuse (ROI)**

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

*Children First: National Guidance for the Protection and Welfare of Children, 2017— Chapter 2, pg. 09.*

**Physical Abuse (NI)**

**Physical Abuse** is deliberately physically hurting a child. It might take a variety of different forms, including hitting, biting, pinching, shaking,

throwing, poisoning, burning or scalding, drowning or suffocating a child. Co-operating to Safeguard Children and Young People in Northern Ireland, 2.6, pg. 14

**Indicators of Physical Abuse**

Physical abuse can include the following:

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

The Children First Act 2015 includes a provision that abolishes the common law defence of reasonable chastisement in court proceedings.

*Children First: National Guidance for the Protection and Welfare of Children, 2017— Chapter 2, pg. 09.*

**Sexual Abuse (ROI)**

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

*Children First: National Guidance for the Protection and Welfare of Children, 2017, Chapter 2—pg. 10.*

**Sexual Abuse (NI)**

Sexual Abuse occurs when others use and exploit children sexually for their own gratification or gain or the gratification of others. Sexual abuse may involve physical contact, including assault by penetration (for example, rape, or oral sex) or non-penetrative acts such as masturbation,

kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via e-technology). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children.

*Co-operating to Safeguard Children and Young People in Northern Ireland, Section 2.6, pg. 14*

### **Indicators of Sexual Abuse**

- Overly affectionate behaviours
- Injuries to anal/genital area, STDs, pregnancy
- Sexualised drawings or play
- Having unexplained sums of money
- Changes in usual demeanour (e.g.. Becoming insecure/clingy)
- Depression, self-mutilation, running away
- Fear of changing clothes in public
- Regressed behaviour patterns, such as thumb sucking, recourse to old teddy bears etc.
- Promiscuity, provocative behaviours/acts
- Using sexualised language inappropriate to age.

### **Age of Consent & Sexual Abuse**

In relation to child sexual abuse, it should be noted that in criminal law the age of consent to sexual intercourse is 17 years for both boys and girls. Any sexual relationship where one or both parties are under the age of 17 is illegal. However, it may not necessarily be regarded as child sexual abuse. Details on exemptions for mandated reporting of certain cases of underage consensual sexual activity can be found in Chapter 3 of the Guidance.

*Children First: National Guidance for the Protection and Welfare of Children, 2017, Chapter 2—pg. 10.*

In Northern Ireland (as in the rest of the UK) the age of consent is 16 for both men and women.

### **Signs of Abuse or Neglect (general)**

#### **Signs of abuse which are more indicative than others include:**

disclosure of abuse by a child or young person;  
age-inappropriate or abnormal sexual play/knowledge;  
specific injuries or patterns of injuries;  
absconding from home or a care situation;  
attempted suicide;  
underage pregnancy or sexually transmitted disease;  
signs in one or more categories at the same time. For example, signs of developmental delay, physical injury and behavioural signs may together indicate a pattern of abuse.

### **Children with additional vulnerabilities**

- Children with communication difficulties.
- Children with disabilities.
- Children who are homeless.
- Children who are separated from their families, e.g. Children in care, refugees.
- Children in the criminal justice system.
- Children who are carers.
- Children living with domestic violence.

### **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 includes behaviours such as physical aggression, cyberbullying, damage to property, intimidation, isolation/exclusion, name calling, malicious gossip and extortion. Bullying can also take the form of abuse based on gender identity, sexual preference, race, ethnicity and religious factors. With developments in modern technology, children can also be the victims of non-contact bullying, via mobile phones, the internet and other personal devices.

*(Children First: National Guidance for the Protection and Welfare of Children, 2017— Chapter 2, pg. 12)*

## **21. PROCEDURES FOR RESPONDING TO A SAFEGUARDING CONCERN**

The guiding principle is that the safety of the guest should be the paramount consideration and at no time should a guest be put at further risk of harm by delay or inaction. Any allegation or concern regarding the abuse of a guest should be treated seriously and for this reason it is important for anyone raising a concern to follow the procedure for responding and reporting as laid out in this document. Particular care should be taken with regard to confidentiality and the sharing of information with appropriate people. The Trust has a responsibility to pass on safeguarding concerns about a guest to civil authorities even when it does not concern Trust personnel directly.

### **Responding to a concern**

There are a number of ways that you may become concerned that a guest is suffering abuse. It could be that the guest tells you, or a concerned adult notifies you. It could also be that through your involvement with them you notice a physical injury or a noticeable change in behaviour. It may be that you are concerned about the behaviour of a carer or staff member towards the guest in their care. It could also happen that someone confides in you about abuse that happened to them in the past.

You may also be concerned about a situation that may constitute “reckless endangerment of a child” whereby “someone with authority or control over a child, or an abuser, intentionally or recklessly causes or permits a child to be placed or left in a situation of serious harm or sexual abuse.” (Criminal Justice Act 2006, Section 176)

Any person who receives a concern, suspicion, disclosure or allegation of abuse or who suspects that a guest is being abused or is at risk of being abused must report their concerns without delay to the DLP. It is important not to discuss the incident/concern with anyone other than those detailed in these procedures.

Concerns regarding guests and involving Trust personnel or activities must be reported to the DLP.

All concerns regarding suspected abuse will be reported, by the DLP, to the Statutory Authorities.

## **RESPONDING TO A DISCLOSURE**

### **Dealing with a Disclosure**

This section provides advice on how to respond if and when an adult or child takes the brave step to disclose their abusive experience.

#### **Responding to a Disclosure: DOs**

- Stay calm, listen carefully and patiently.
- Reassure them that it was right to tell you.
- Explain that you will have to inform the appropriate authorities.
- Record what they've said as soon as possible after the meeting, using their own words as far as possible.

#### **Responding to a Disclosure: DON'Ts**

- Make judgments about the alleged abuser.
- Promise to keep secrets.
- Tell them stories about other people.
- Tell them that everything will be fixed straight away.
- Don't press for details, except to clarify.
- Don't fill in words or finish sentences.
- Don't convey your anger, shock or embarrassment, or give your opinion.

## **22. REPORTING A CONCERN**

As soon as possible record what you have noticed/ been told on an incident form. This report should be forwarded to the DLP who will notify the relevant statutory authorities. You can also contact them directly. You should also keep a copy of the report for your own files. It should be kept in a safe place preferably in a locked cabinet, preferably not at home.

Remember it is not up to you to decide if abuse has taken place or not, and even if you are uncertain it is very important that you record any concerns you may have and keep a copy. At a later stage you may decide that taken together these reports are a cause for concern that you need to act on.

Having become concerned or having heard about an allegation from the past you should contact the DLP or go directly to the Statutory Authorities

### **Grounds for Reporting**

Disclosure from a child or adult.

- Witness account – third party.
- Direct evidence of injury or behaviour consistent with abuse.
- Injury or behaviour which is ambiguous but where there are corroborative indicators of abuse.
- Consistent signs of neglect over time.
- Where you have a strong suspicion of injury / neglect or abuse.

### **Confidentiality**

- Effective child protection is dependent on the willingness of those involved with children to share and exchange relevant information on a 'need to know' basis.
- The provision of information to statutory agencies for the protection of a child is not a breach of confidentiality or data protection legislation.

### **Mandatory Reporting (NI)**

- In England, Scotland and Wales there is no formal requirement in law to report child protection concerns to the statutory authorities.
- However, in Northern Ireland, Section 5(1) of the Criminal Law Act (1967) provides for a criminal offence of failing to disclose an arrestable offence to the police, which, de facto, includes most offences against children.

### **Role of the Civil Authorities**

#### **An Garda Síochána/PSNI**

- To investigate.
- To establish if a crime has been committed.
- DPP decides on prosecution.

#### **Tusla/HSC Trust**

- To assess risk to children.
- To put in place safeguarding arrangements for children.

## **23. MANDATED PERSON**

### **Children First Act 2015:**

#### **Children First National Guidelines for the Protection and Welfare of Children 2017**

Mandated persons are people who have contact with children and/or families who, by virtue of their qualifications, training and experience, are in a key position to help protect children from harm. Mandated persons include key professionals working with children in the education, health, justice, youth and childcare sectors. Certain professionals who may not work directly with children, such as those in adult counselling or psychiatry, are also mandated persons. The list also includes registered foster carers and members of the clergy or pastoral care workers of a church or other religious community. The Children First Act 2015, Schedule 2, provides a full list of people who are classified as mandated persons.

#### **Mandated persons have two main legal obligations under the Children First Act 2015:**

- To report harm of children, above a defined threshold, to Tusla
- To assist Tusla, if requested, in assessing a concern which has been the subject of a mandated report

## 24. GUIDANCE FOR RECORDING SAFEGUARDING CONCERNS

*From the NBSCCCI Guidelines on Safeguarding Children  
Recording Guidance*

Good record keeping is an integral part of safeguarding children within the Catholic Church: it should not be considered as an optional extra. There are many reasons why all those involved in safeguarding children should keep good records. These include; helping to improve accountability, showing how decisions relating to safeguarding children are made; supporting effective assessments, providing documentary evidence of actions taken and helping to identify risks, and demonstrating how those risks have been managed. Good record keeping also helps to safeguard the rights of all concerned.

Standard 2.4 in Safeguarding Children Standards and Guidance Document requires that “there is a process of recording incidents, allegations and suspicions and referrals. These will be stored securely so that confidential information is protected and complies with relevant legislation”.

Set out below are the primary reasons for recording, as well as the processes necessary to write and maintain accurate records. Also detailed are recommendations around information sharing and retention and storage of sensitive data.

### Why do we record?

1. Ensures accuracy of reporting what is known- This can be for internal use as well as in circumstances necessary to report and be accountable to external agencies. Creating written records as soon as practical after the event avoids memory loss, and distortion of the information.
2. Assists with management and decision making-recording factual information accurately facilitates an evaluation of the information and enables decision making.

3. Protects the subjects of recording and the recorder by having an agreed accurate record. As far as possible information recorded should be agreed with the subject of the recording as an accurate record of what took place.
4. Enables accountability—all those who have responsibilities for safeguarding children within the Catholic Church will be held accountable for their actions. Good recording is required as evidence that the safeguarding of children is considered a priority and that all steps have been taken to prevent and minimise risk, and manage allegations appropriately.
5. Enables the proper tracking of complaints- it is important that we demonstrate through our records that complainants have been listened to and responded to in a compassionate and caring way. It is therefore important that accurate records are kept of all complaints received and how these have been responded to.
6. Allows for continuity where there are changes in personnel managing a concern-Safeguarding children can involve a number of people including the Chairperson/Vice Chairperson/Trust Doctor/National Coordinator/Designated Person. Personnel can also change during the life of managing the concern. Therefore it is important that good factual details are maintained, to allow for a consistent fair approach and continuity of care for complainants as well as management of perpetrators (even vague information may at a later stage take on greater significance in the context of further information becoming available). All concerns should be recorded.

### Principles of good record keeping

- All records should be legible, preferably typed.
- All entries should be signed. In the case of written records, the person’s name and job title should be printed alongside the entry, e.g. Group Leader.
- All records should be dated and timed. This should be in real time and chronological order.
- A narrative should be constructed which sets out the chronology of events and references any correspondence.

- Records should be accurate and presented in such a way that the meaning is clear.
- Records should be factual and not include unnecessary abbreviations, jargon, opinion or irrelevant speculation.
- Judgement should be used to decide what should be recorded. Is it relevant? Is it as objective as possible? Are facts and any opinions deemed necessary clearly distinguished?
- Records should identify any risks and show the action taken to manage these.
- Records should not be altered or destroyed without proper authorisation. If the need for alteration arises both the fact of such authorisation and the alteration(s) made to any original record/documentation should be dated and signed.

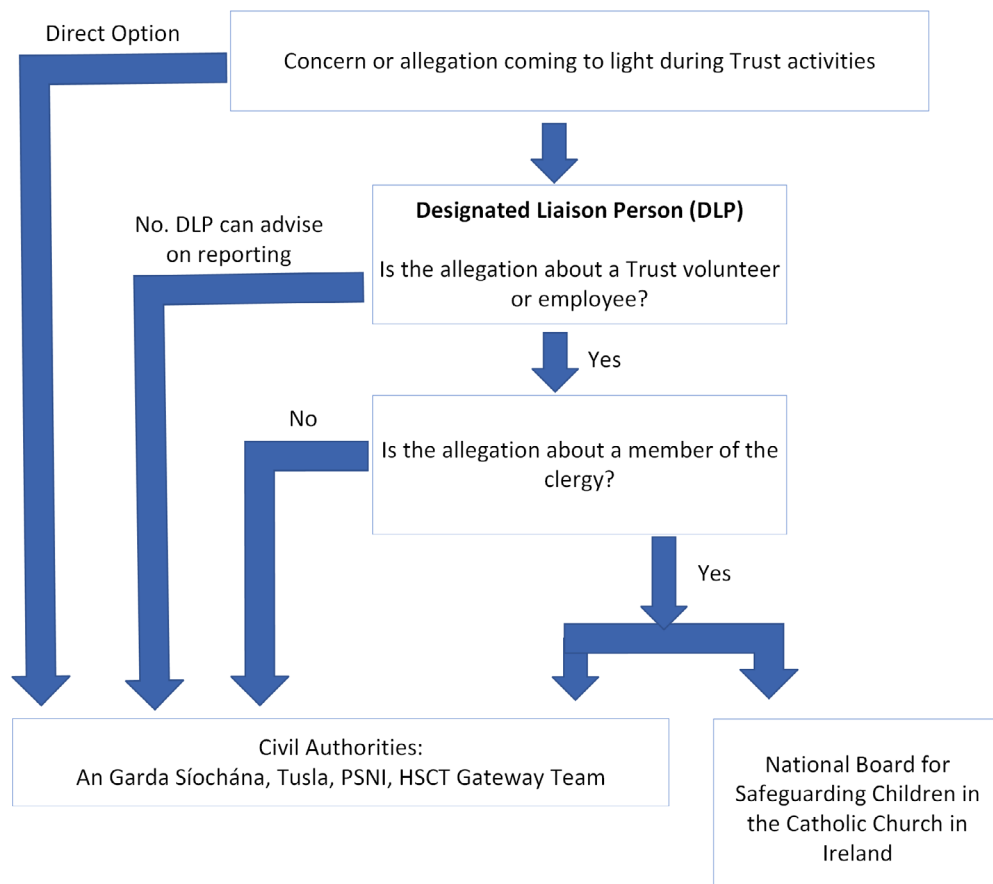
#### **What to record**

- All factual verifiable information
- Description of direct observations by the recorder.
- Repeated information/observations.
- Considered assessments undertaken and/or treatment provided with any resultant observations.
- All correspondence received including letters, reports, emails and a summary of meeting and telephone discussions.
- Identification of any risks and management actions undertaken.

## **25. CONFIDENTIALITY STATEMENT**

The Trust recognises the importance of ensuring peoples' right to confidentiality and is committed to keeping confidential all personal information about children/vulnerable adults and their families. An exception is when a safeguarding concern arises in relation to a guest. In this situation, information will be shared on a "need to know basis" in the best interest of the child/vulnerable adult as follows:

1. Information will only be forwarded on a need to know basis in order to safeguard the child/young person.
2. Giving information to appropriately Designated Persons and/or statutory authorities for the protection of a child is not a breach of confidentiality.
3. Primary carers have a right to know if personal information is being shared and a report is being made to the Statutory Authorities unless doing so could put the child at further risk.
4. As the Trust is under the patronage of the Irish Catholic Church, the Trust abides by the rule that in relation to child protection, reporting is mandatory.



## 26. MANAGING CONCERNS/COMPLAINTS

The welfare and protection of our guests will be the paramount consideration, with due regard to the rights of all parties. The requirement of civil and criminal law will be met, and all requirements to notify the statutory authorities will be met. The support needs of the complainants and any other relevant person will be addressed.

1. A concern/complaint is reported to the Designated Liaison Person (DLP).
2. The concern/complaint is assessed by the DLP.
3. If the concern/complaint reaches the threshold of reasonable

grounds for concern and the respondent is a member of the Irish Pilgrimage Trust, then the DLP gathers all the relevant information and notifies the Chairperson, Statutory Authorities and the National Board for Safeguarding Children (if applicable).

4. The DLP will recommend the necessary actions to the Chairperson and a plan will be agreed which will include the appropriate responses regarding all people involved in or affected by the situation. Specific actions and responsibilities including the appointment of support personnel for complainants and respondents will be identified and these will be implemented and monitored on a regular basis.
5. If the concern/complaint is deemed to have reached the threshold of reasonable grounds for concern but the respondent is not a member of the Trust, then the DLP will establish all the relevant information and notify the Statutory Authorities. The DLP will ensure that all necessary actions to be taken by the Trust are identified and carried out.
6. If the concern/complaint is not deemed to be a Child Protection issue but may breach another Trust policy, this will be referred to the Chairperson of the Trust.
7. Staff or carers who are the subject of a complaint will be notified of the complaint unless the Trust is requested not to do so by the civil authorities, or some compelling circumstance requires a delay. Such circumstance will be recorded and the delay will be agreed by the DLP and the Chairperson. All obligations to provide information and support to the person who is subject of a complaint will be met.
8. If a concern/complaint is received where a guest allegedly harms another guest, this must be reported to the DLP who will take appropriate action taking into account and abiding by the laws of the jurisdiction where the alleged incident took place. The respondent in this instance will be removed from the group without prejudice. If it is necessary to place the respondent in alternative accommodation, this is the responsibility of the Trust Chairperson. A plan of action will be drawn up involving the DLP, Trust Chairperson and the National Coordinator.
9. If a concern/complaint is received where a carer allegedly

harms a guest, this must be reported to the DLP who will take appropriate action taking into account and abiding by the laws of the jurisdiction where the alleged incident took place. The respondent in this instance will be removed from the group without prejudice. If it is necessary to place the respondent in alternative accommodation or be sent home, this is the responsibility of the Trust Chairperson. A plan of action will be drawn up involving the DLP, the Trust Chairperson and the National Coordinator.

## **27. COMPLAINTS PROCEDURE**

A complaint is defined as a concern about issues or breaches of the codes of behaviour, excluding allegations or suspicions of abuse. Allegations of abuse should always be dealt with in accordance with the Reporting Procedure.

A complaint can be made about any action or inaction that it is claimed, does not accord with fair or sound practice, and adversely affects the person by whom or on whose behalf, the complaint is made.

Depending on the nature and seriousness of a complaint, a carer/staff member will attempt to resolve the complaint locally and within the activity. In the event that the complaint is not resolved at this stage, the complaint must be put in writing and sent to the National Coordinator or the Trust Vice Chairperson. The Trust may appoint a member of the Board of Trustees to investigate the matter and report back to the Board. A copy of the complaint will be stored securely by the National Coordinator.

## **28. WHISTLE BLOWING POLICY**

The Irish Pilgrimage Trust encourages any person who has a concern about people or practices in the Trust which may pose a risk to the safety and welfare of our guests to contact our DLP. If the risk relates to a specific child, we will notify the statutory authorities without delay and work with them to ensure the child's safety and welfare.

### **Anonymous referrals**

The Trust will encourage you to identify yourself but if you are not able or prepared to do this, we will receive and act on your concern. Providing us with your name helps us to understand your concern, not having this information may limit how well we can respond, however we will receive and act on your concern regardless. We understand that it may be difficult to come forward if you have a concern. However the welfare and protection of children must be our priority and we rely on your help and support to ensure that we meet the highest safeguarding children standards.

## 29. PROTECTIONS FOR PERSONS REPORTING

### Child Abuse Act 1998

Members of the public who report concerns of child abuse are legally protected from civil liability if they make the report:

1. reasonably and
2. in good faith

to Tusla or the Gardaí.

It is an offence to maliciously make a false allegation.

### Reckless Endangerment of Children

- An offence arising when someone with authority or control over a child, or an abuser, intentionally or recklessly causes or permits a child to be placed or left in a situation of serious harm or sexual abuse. (Criminal Justice Act 2006, Section 176)
- The offence is a recommendation of the Ferns Report, 2005.

### Reporting Procedure

- If you have a suspicion or concern that a child or young person is being abused, you must report this **without delay** to your DLP or if you are a mandated person you may submit a report directly to Tusla or make a joint report with the DLP of the Trust.  
(See also Section 23 MANDATED PERSONS)
- Make a record which will be submitted to the DLP.
- The DLP will report this to the civil authorities, having ascertained that it is a relevant concern and not a disciplinary matter which does not constitute abuse.
- You will be kept up to date on progress as relevant/appropriate.
- If the DLP decides not to refer the incident, you have the right to reasons in writing for this decision and to refer the matter yourself to the civil authorities.

## PART IV: APPENDICES

## 30. DATA PROTECTION LEGISLATION AND GDPR

The principal legislation dealing with data protection in Ireland is the Data Protection Acts 1988 to 2018. A new European Union-wide framework known as the General Data Protection Regulation (GDPR) changes the rules on data protection. It provides for a more uniform interpretation and application of data protection standards across the EU.

The GDPR came into force across the EU on 25 May 2018. The Data Protection Act 2018, which was signed into law on 24 May 2018, changes the previous data protection framework, established under the Data Protection Acts 1988 and 2003 (pdf). It's provisions include:

Establishing a new Data Protection Commission as the State's data protection authority  
Transposing the law enforcement Directive into national law  
Giving further effect to the GDPR in areas where member states have flexibility (for example, the digital age of consent)

The eight principles state that the data should be:

1. Fairly and lawfully processed;
2. Processed for limited purposes;
3. Adequate, relevant and not excessive;
4. Accurate;
5. Not kept for longer than necessary;
6. Processed in line with subjects rights;
7. Secure; and
8. Not transferred to countries without adequate protection.

## The Irish Pilgrimage Trust Privacy Notice

Information for you about how we look after personal information.

### 1. Introduction

Protecting personal information is important to The Irish Pilgrimage Trust. We gather information from our employees and from volunteers and young people who travel with us to Lourdes or who stay in our houses in Ireland. The Irish Pilgrimage Trust gathers and processes your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your data.

### 2. Charity Information

The Irish Pilgrimage Trust (formerly IHCPT) has been in existence in Ireland since 1972. We are a charitable trust run by a Voluntary board of Trustees, employing 4 staff members at our registered offices in Kilcuan, Clarinbridge, Co. Galway H91 W596.

We bring young people with special needs to Lourdes at Easter each year for 7 days. We also have young people and adults with additional needs travelling in groups over the Summer to stay in Hosanna House outside Lourdes. We have 2 holiday homes for families and groups of people with special needs in Ireland and our volunteers offer Friendship Week breaks over the Summer for people with special needs.

Our Data Protection officer is James McHugh who can be contacted by writing to him at the above address or at [jmchugh@irishpilgrimagetrust.com](mailto:jmchugh@irishpilgrimagetrust.com) or by phoning our office at +353 91 796622.

We are a registered charity under the Revenue and our revenue number is CHY5992. The Irish Pilgrimage Trust is also regulated by the Charities Regulatory Authority and our Charity Registration Number is 20009953. Our accounts are audited each year and a copy submitted to the Charities Regulatory Authority.

### **3. Scope of this Policy**

This policy explains how we use your personal data. This includes how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal Data. This policy is intended for the young people who avail of our pilgrimages and our holiday and their families; for our volunteers throughout the country and for our staff.

### **4. What is Personal Data**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

In simpler terms, it is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in part 6, below.

### **5. Protecting your information.**

We are committed to protecting your personal data in accordance with article 32 of the GDPR and we will maintain appropriate technical and organisational security measures to protect your data against any unauthorised or unlawful processing and against any accidental loss, destruction or damage. We are committed to assessing potential risks on an on-going basis arising from our data processing activities, taking into account the means that are used now and in the future (technology, resources, service providers, etc.) and any other circumstances which may have an impact on data security.

### **6. Data we collect**

In order to provide holidays and pilgrimage holidays for young people and adults with special needs, we need to collect a number of categories of personal data from young people with special needs and their families and guardians or other carers and from volunteers who care for these young people on our behalf. We require volunteers to supply two referees. We also collect data for all those who participate in our biennial cycle including cyclists and those on backup.

Depending on your relationship with us, these personal data categories may include Name, Address, Date of Birth, contact details such as telephone number, mobile phone number, email address, passport and EHIC details and school/training course information as well as medical information.

### **7. How we use your information**

Under the GDPR, we must always have a lawful basis for using personal data. We will use your personal data to provide holidays to young people with special needs and to safeguard the young people and the volunteer carers and the staff involved in providing these breaks.

### **Information Sharing**

The data subject should be informed that a record is being kept and permission should be sought to share that information with those who need to know, in order to safeguard children. If the data subject is unwilling to give consent to sharing the information and if this information is necessary to protect children, the data subject’s consent can be overridden only in limited circumstances. (Specific advice and guidance may be sought from the data protection officer(s).)

### **8. Retention of your information**

In the event that you travel with the Trust, we need to retain your data because it may be required in the event of an incident or claim being brought to light after the holiday/pilgrimage.

In the event that you do not travel with the Trust we will retain your data

two years after the date of the holiday/pilgrimage that your application was unsuccessful for. In the event that you travelled with the Trust in the past the need for data retention arising from your previous holiday/pilgrimage will stand.

## **9. Your rights regarding personal data**

Under the GDPR you have a number of important rights regarding the way we process your personal data. These rights are outlined below.

**Right of access.** If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (subject to applicable exemptions). This is known as a “subject access request (SAR). All subject access requests should be made in writing and sent to the email or postal address shown in Part 2 of this policy. To help us better deal with your request please provide us with the information necessary to identify you and to identify the personal data you require. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible. This form can be downloaded from [www.irishpilgrimagetrust.com](http://www.irishpilgrimagetrust.com).

There is normally no charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**Right to rectification.** If the personal data we hold on you is inaccurate or incomplete you have the right to rectify such personal data and we would encourage you to ensure the personal data we hold on you is kept as up

to date and accurate as possible. If at any time there is a change to your personal data, please advise us by contacting our office using the details provided in part 2 of this document.

**Right to Erasure.** In certain circumstances you have the right to request the deletion of your personal data where there is no compelling reason (e.g. a regulatory requirement for us to retain it) for us to continue processing it.

**Right to restrict processing.** In certain circumstances you can request the restriction of the processing of your personal data where you contest the accuracy of the information; where you object to processing which is based on legitimate interests; where the processing is unlawful and you wish to restrict the processing rather than seek erasure; or where we no longer require to retain your personal data but you wish the personal data to be held while you establish, exercise or defend a legal claim.

**Right to data portability.** You can request to receive your personal data, which you provided to us, in a structured, commonly used and machine readable format and have the right to transmit this data to another controller.

**Right to withdraw consent.** If we are processing your personal data on the legal basis of consent you have the right to withdraw your consent at any time. If you withdraw your consent we will no longer be able to carry out processing based on your consent. However by withdrawing your consent it does not invalidate any processing which was undertaken prior to the withdrawal of your consent.

**Right to object to processing.** You have the right to object to processing based on legitimate interests. Where we have indicated that we are processing your personal data based on legitimate interest you are entitled to such processing on grounds relating to your particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms or where the processing is

necessary for the establishment, exercise or defence of legal claims.

Note that when you or your child apply to join the Trust as a volunteer or as a guest the processing of your information will become a condition of the contract between us as we require certain information in order to be able to provide you with our service. If you do not wish us to process your information we may be unable to provide our service to you.

Right to lodge a complaint with Data Protection Commissioner. If you are not happy with the way that we deal with and process your data, we would encourage you to contact our privacy officer by using one of the methods detailed in part 2 of this policy. However, you also have the right to lodge a complaint with the Data Protection Commissioner by emailing [info@dataprotection.ie](mailto:info@dataprotection.ie) or writing to the Data Protection Commissioner, Canal House, Station Road, Portlington, R32 AP23 Co Laois. If you are resident in Northern Ireland, you can email [ni@ico.org.uk](mailto:ni@ico.org.uk) or write to The Information Commissioner's Office – Northern Ireland, 3rd Floor, 14 Cromac Place, Belfast BT7 2JB.

#### **10. Changes to this policy notice**

This Statement will be regularly reviewed as part of our Management Review Process to ensure we continue to meet our obligations in processing your personal data and protecting your privacy. In order to do so we reserve the right to update, modify and amend this Statement at any time as required. We would recommend that you check back regularly to keep informed of any updates. You can view the latest version of this document at any time on the Trust's website [www.irishpilgrimagestrust.com](http://www.irishpilgrimagestrust.com) or obtain a copy from our head office.

## **31. APPENDIX 2 - Child Safeguarding Statement**

### **The Irish Pilgrimage Trust**

#### **Child Safeguarding Statement**

##### **Introduction:**

As defined in and required by the Children First Act 2015, the Trust has prepared this written statement specifying the service we provide and the principles and procedures to be observed to ensure as far as practicable, that a child, while availing of our service, is safe from harm.

##### **Objects of The Irish Pilgrimage Trust:**

*We bring people with additional needs on pilgrimage holidays to Lourdes and on holiday in Ireland and we fundraise to cover their costs*

##### **1. Name of Service being provided**

The Irish Pilgrimage Trust offers volunteer supported independent holidays to young people with special needs in Ireland and in Lourdes, France. The young people attend these holidays without their parents/guardians and enjoy the experience of having an independent holiday but with caring support of volunteer carers.

##### **2. Nature of service and principles to safeguarding children from harm**

All volunteer carers are required to read and follow the Trust Code of Practice which is reviewed and updated (if required) every three years. Volunteer carers are also required to read and follow the Trust Safeguarding policy which is reviewed and updated (if required) every year. All volunteer carers are vetted and undergo safeguarding training.

**3. Child Risk Assessment**

We have carried out an assessment of any potential for harm to a child while availing of our services including the area of online safety when accessing the internet. Below is a list of the areas of risk identified and the list of procedures for managing these risks.

	<b>Risk identified</b>	<b>Procedure in place to manage risk identified</b>
1.	Risk of harm to a child while in the care of our service.	Children are supervised at all times while in our service and there must be a minimum of 2 volunteers with a child. An adult carer will never be alone with a child. All activities that take place are group activities. All staff and volunteers undergo safeguarding and other training prior to working with children in our service.
2.	Those that work with children are unsafe to do so	All staff and volunteer carers are vetted and undergo safeguarding training prior to any involvement with children under the care of our service. Volunteer carers must supply names of two referees who can provide a character reference for them.
3.	Those that work with children behave inappropriately towards them.	All staff and volunteer carers are vetted and undergo safeguarding training prior to any involvement with children under the care of our service. Volunteer carers must supply names of two referees who can provide a character reference for them.

4.	Children exhibit inappropriate sexual behaviour	Groups follow the Trust Room Sharing Policy as outlined in the Trust Safeguarding Policy. If the child is sharing a room with another child, they are moved to a single room for the remainder of the holiday under the supervision of 2 volunteer carers. A report is made by the group leader to the Designated Liaison Person who will follow the Trust Safeguarding Policy guidelines.
5.	Children access inappropriate sites on the internet while in the care of our service.	Families and their children are required to follow the Trust Mobile Devices Policy as outlined in the Trust Safeguarding Policy which restricts the use of devices to access internet while in the care of our service.
6.	Children who use our service do not understand the roles and responsibilities in place to encourage positive behaviour.	Volunteer carers usually the group leader and the group nurse, visit the families prior to the holiday and our safeguarding guidelines are outlined to parents/guardians and to children before the holiday commences.
7.	Volunteers fail to understand the procedure to follow when reporting a disclosure made while in the care of our service or any other safeguarding concerns.	All volunteer carers are vetted and must undergo safeguarding training annually. Volunteers will also have read and understood our Trust Safeguarding Policy and are issued with a list of Safeguarding Guidelines to follow. Safeguarding is always on the agenda at board and national meetings.

**4. Procedures**

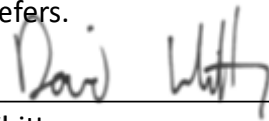
Our Child Safeguarding Statement has been developed in line with requirements under the Children First Act 2015; the Children First; National Guidance, and Tusla's Child Safeguarding; A Guide for Policy, Procedure and Practice. In addition to the procedures listed in our risk assessment, the following procedures support our intention to safeguard children while they are availing of our service:

- Procedure for the management of allegations of abuse or misconduct against workers/volunteers of a child availing of our service.
- Procedure for the safe recruitment and selection of workers and volunteers to work with children.
- Procedure for provision of and access to child safeguarding training and information, including the identification of the occurrence of harm.
- Procedure for the reporting of child protection or welfare concerns .
- Procedure for maintaining a list of the persons (if any) in the relevant service who are mandated persons.
- Procedure for appointing a relevant person.

All procedures listed are available in the Trust Safeguarding Policy and the Trust Code of Practice.

**5. Implementation**

We recognise that implementation is an ongoing process. Our service is committed to the implementation of this Child Safeguarding Statement and the procedures that support our intention to keep children safe from harm while availing of our service. This Child Safeguarding Statement will be reviewed annually at the AGM of the Board of Trustees or as soon as practicable after there has been a material change in any matter to which the statement refers.

Signed:  Trust Chairperson  
David Whitty

Date: 13 January 2024

**32. APPENDIX 3 - Safeguarding Vulnerable persons at Risk of Abuse Policy and Procedures****The Irish Pilgrimage Trust****Safeguarding Vulnerable Persons at Risk of Abuse Policy and Procedures****Section 1 - Introduction**

The Irish Pilgrimage Trust (the Trust) recognises and upholds the dignity and rights of vulnerable persons and is committed to safeguarding all our members. The guidance set out in this document provides a framework of how the Trust can best safeguard vulnerable adults.

These guidelines apply to all staff and volunteers of the Trust and adhere to current best practice and guidance in the Republic of Ireland and Northern Ireland. They should be read in conjunction with The Irish Pilgrimage Trust Safeguarding Policy which is available on our website [www.irishpilgrimagestrust.com](http://www.irishpilgrimagestrust.com).

The Trust is committed to the safeguarding of vulnerable persons from abuse. It acknowledges that all persons have the right to be safe and to live a life free from abuse. All persons have this right, regardless of their circumstances.

This policy will be reviewed and amended every 3 years or more often if required. All reviews will take account of any major changes including legislative or policy changes in safeguarding.

## Section 2 – Definitions

Definition of a guest as defined in the Trust's Code of Practice in relation to a guest who travels to Lourdes or attends Friendship Week with the Trust.

A guest is a person who may have special needs who is invited by the Trust and avails of the opportunity to accompany one of the Trust groups on the annual Easter Lourdes Pilgrimage, Friendship Week Short summer break, annual Hosanna House Pilgrimage or other such event organised by the Trust.

Definition of a vulnerable adult as defined in the Trust's Code of Practice in relation to guests travelling to Lourdes or attending Friendship Week with the Trust.

A Vulnerable Adult is a person aged 18 years or older who, by reason of their disability, age or illness is or may be unable to take care of him or herself, or unable to protect him or herself against "significant harm" or "exploitation".

## Section 3 – Safeguarding Statement

The Irish Pilgrimage Trust is committed to best practice, which protects children and vulnerable adults who participate in Trust activities. Staff, trustees, carers and volunteers in the Trust accept and recognise our responsibilities to develop awareness of the issues which cause children/vulnerable adults harm.

These responsibilities include:

- a. Treating children and vulnerable adults with respect at all times.
- b. Ensuring that children and vulnerable adults will be listened to and heard.

c. Sharing information about child protection and good practice with children, vulnerable adults, parents, staff, carers and volunteers.

d. Sharing information about concerns with the relevant agencies and involving parents, children and vulnerable adults appropriately.

e. Carefully following the procedures for recruitment, training and management of staff, carers and volunteers as outlined in the Trust Safeguarding Policy.

f. Being committed to reviewing and evaluating our policies and procedures on an ongoing basis.

g. Adopting best practice in accordance with all relevant legislation.

h. It is mandatory that all members of the Trust read and are familiar with the Trust Safeguarding Policy. See [www.irishpilgrimagestrust.com](http://www.irishpilgrimagestrust.com) or contact the Trust office for a copy.

i. All group leaders will discuss the Trust Safeguarding Policy with carers and must ensure that all carers sign confirmation that they have read and understood the Trust Safeguarding Policy.

## Section 4 – Risk Assessment

### 1. Vulnerable Adults Risk Assessment

We have carried out an assessment of any potential for harm to a vulnerable adult while availing of our services including the area of online safety when accessing the internet. Below is a list of the areas of risk identified and the list of procedures for managing these risks.

	<b>Risk identified</b>	<b>Procedure in place to manage risk identified</b>
1.	Risk of harm to a vulnerable adult while in the care of our service.	Vulnerable adults are supervised at all times while in our service and there must be a minimum of 2 volunteers with a vulnerable adult. An adult carer will never be alone with a vulnerable adult. All activities that take place are group activities. All staff and volunteers undergo safeguarding and other training prior to working with vulnerable adults in our service.
2.	Those that work with vulnerable adults are unsafe to do so	All staff and volunteer carers are vetted and undergo safeguarding training prior to any involvement with vulnerable adults under the care of our service. Volunteer carers must supply names of two referees who can provide a character reference for them.
3.	Those that work with vulnerable adults behave inappropriately towards them.	All staff and volunteer carers are vetted and undergo safeguarding training prior to any involvement with vulnerable adults under the care of our service. Volunteer carers must supply names of two referees who can provide a character reference for them. All Trust volunteers involved with vulnerable adults sign the Trust Volunteer Code of Conduct.

4.	Vulnerable adults exhibit inappropriate sexual behaviour	Groups follow the Trust Room Sharing Policy as outlined the Trust Safeguarding Policy. If the vulnerable adult is sharing a room with another vulnerable adult, they are moved to a single room for the remainder of the holiday under the supervision of 2 volunteer carers. A report is made by the group leader to the Designated Liaison Person who will follow the Trust Safeguarding Policy guidelines.
5.	Vulnerable adults access inappropriate sites on the internet while in the care of our service.	Families and vulnerable adults are required to follow the Trust Mobile Devices Policy as outlined in the Trust Safeguarding Policy which restricts the use of devices to access internet while in the care of our service.
6.	Vulnerable adults who use our service do not understand the roles and responsibilities in place to encourage positive behaviour.	Volunteer carers usually the group leader and the group nurse, visit the families prior to the holiday and our safeguarding guidelines are outlined to parents/ guardians and to vulnerable adults before the holiday commences.
7.	Volunteers fail to understand the procedure to follow when reporting a disclosure made while in the care of our service or any other safeguarding concerns.	All volunteer carers are vetted and must undergo safeguarding training annually. Volunteers will also have read and understood our Trust Safeguarding Policy and are issued with a list of Safeguarding Guidelines to follow. Safeguarding is always on the agenda at board and national meetings.

## Section 5 – Consent and Capacity

It is important that staff and volunteers of The Irish Pilgrimage Trust understand the issues of consent and capacity in order to establish an individual's ability to give meaningful consent.

Consent is a clear indication of a willingness to participate in an activity or to accept a service. The vulnerable person may signal consent verbally, by gesture or in writing. Decisions with more serious consequences will require more formal consideration of consent and appropriate steps should always be taken to ensure that consent is valid.

The consent of a vulnerable person is considered valid ONLY if:

- 1. He/she has the capacity to consent, i.e. he/she can understand and weigh up the information needed to make the decision.**
- 2. Enough information has been given to him/her, in an appropriate way, on which to base the decision.**
- 3. Consent has been given on a voluntary basis that is free from coercion or negative influence. If any of these three factors is absent, consent cannot be valid.**

Staff and volunteers should remember that no one can give or withhold consent on behalf of another adult who lacks capacity to make the specific decision at the time it needs to be made, unless special provision has been made for this in law. In certain situations, consent or the refusal of consent may be overridden. This is generally done when it is in the interests of the public to do so, for example, the disclosure of information to prevent a crime or risk to health or life.

If staff or volunteers have any doubts or concerns about whether the consent of a vulnerable person is valid, or whether he/she has the capacity to consent, they should bring this to the attention of the Designated Liaison Person of the Irish Pilgrimage Trust who will consult with the relevant statutory authorities.  
For further information, please refer to the HSE Consent Policy on **HSE.ie**

## Section 6 - Recruitment

The Irish Pilgrimage Trust will ensure best practice in the recruitment of staff and volunteers. Those working within the Trust either in a paid or voluntary capacity must be recruited safely and must be suitable for their position/role within the Trust.

Recruitment of staff and volunteers and selection of guests is done following guidelines as outlined in the Trust Safeguarding Policy, the Trust Code of Practice and the Employee Recruitment Policy which are available on the Trust website [www.irishpilgrimagetrust.com](http://www.irishpilgrimagetrust.com).

## Section 7 – Recognising and Reporting Abuse

What is abuse?

The HSE Safeguarding Vulnerable Persons at Risk of Abuse National Policy and Procedures (Draft 2019) defines abuse as “A single or repeated act, or omission, which violates a person’s human rights or causes harm or distress to a person. For the purposes of this policy, abuse is understood to mean abuse by a third party”.

There are several forms of abuse, any or all of which may be perpetrated as the result of deliberate intent, negligence or lack of insight and ignorance. A person may experience more than one form of abuse at any one time. Please refer to the Trust Safeguarding policy for more information on abuse categories and recognising abuse.

Everyone is entitled to have their civil and human rights upheld and to live a life free from abuse and neglect. All concerns, allegations and disclosures must be taken seriously and dealt with appropriately. For this reason, it is important for anyone raising a concern to follow the procedure for responding and reporting as laid out in the Trust Safeguarding Policy.

Particular care should be taken with regard to confidentiality and the sharing of information with appropriate people. The Trust has a responsibility to pass on safeguarding concerns about a guest whether they are a child or a vulnerable adult to civil authorities even when it does not concern Trust personnel directly.





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