

STANDARD 1

Creating and Maintaining Safe Environments

MERCY GUIDANCE

**These pieces of guidance are to assist, if necessary,
with the implementation of Standard 1**

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Roles of Safeguarding Personnel in Relation to this Standard

Congregational Leader

The Congregational Leader holds overall responsibility for the implementation of the Child Safeguarding Policy and the Seven Standards within the Congregation of the Sisters of Mercy.

Provincial Leader

The role of the Provincial Leader across all the Seven Standards is outlined in Appendix A. In relation to Standard 1, the Provincial Leader is responsible for:

- Appointing a Safeguarding Committee, and, along with that Committee, ensuring that Local Safeguarding Representatives (LSRs) are in place across the Province;
- Ensuring, with Local Leaders, that all Personnel who are recruited within the Province are suitable and appropriate for their role;
- Ensuring compliance with civil law and policy in creating and maintaining safe environments, and regarding areas such as vetting, safe recruitment, adult-to-Child ratios, codes of conduct and risk assessment.

Safeguarding Committee

The role of the Safeguarding Committee across Standards 1, 5, 6 and 7 is outlined in Appendix A. In relation to Standard 1, the Safeguarding Committee is responsible for:

- Producing a three-year plan for how to implement and maintain Standards 1, 5, 6 and 7 across the Province. This includes the development of Procedures and Practice around creating and maintaining safe environments;
- Liaising with the Local Safeguarding Representatives to identify areas where guidance and support on Policy or Practice is needed;
- Ensuring that records for activities related to Child Safeguarding are produced and stored appropriately (See Appendix B).

Local Safeguarding Representative

The role of the LSR across Standards 1, 5, 6 and 7 is outlined in Appendix A. In relation to Standard 1, the LSR is responsible for:

- Checking and providing advice and support so that all activities within the Province are being carried out in line with the Safeguarding Policies and Procedures of the Sisters of Mercy;
- Liaising with the Child Safeguarding Committee (and the Local Safeguarding Council, if applicable) around areas where further Child Safeguarding advice and support are required.

Storage and Retention of Records Associated with this Standard

The table below lists the types of records that need to be stored appropriately and securely as part of this standard, in accordance with best practice in record-keeping (see Appendix B). The templates for the production of each record, which have been included in the guidance for this standard, are listed in the final column.

Type of Record	Where to Store	Template/Guidance Number/Page Number
Application Forms of those successful	Local Community	1.1A Template 2 Page 8
Application Forms of those unsuccessful	Local Community	1.1A Template 2
Attendance lists/sign-in and sign-out records for each activity involving Children	Local Community	1.4A Template 1 & 2 Page 41 & 42
Parental and Children's Consent Forms	Local Community	1.4A Template 3 Page 44
Accident/Incident Forms	Local Community	1.4B Template 1 Page 48
List of those Vetted	Provincial Office	N/A
Codes of Behaviour for Groups involving Children	Local Community	1.2A Template 1 & 2 Page 31 & 34
Evidence of concerns raised through whistle-blowing, and actions taken	Provincial Office	Guidance 1.6A Page 62
Hazard Assessments for activities carried out by each group involving Young people associated with the Sisters of Mercy	Local Community	1.8A Template 1 Page 69
Evidence of Complaints made through complaints process, and how they have been dealt with	Provincial Office	1.7A Template 1 Page 64
Records of Checks completed on external groups using Church property	Provincial Office	Guidance 1.5A and 1.5B Page 57 and 59
Declaration Forms	Local Community	1.1A Template 4 Page 12
Evidence of when Celebrets/Letters of good standing from visiting clergy have been checked	Provincial Office/ Local Community	Guidance 1.1C Page 22
Media permission Forms	Local Community	1.9A Template 1 Page 70
Written Agreements from Sisters of Mercy who are Ministering with Children in an external organisation or Church body to follow the policy and procedures of that organisation.	Provincial Office	Guidance 1.10A Page 80

1.1A Guidance on Safe Recruitment Procedures

The Congregation of the Sisters of Mercy acknowledges that safe care starts with the appointment of suitably qualified, skilled and vetted personnel who have the desired competencies and skills to carry out their function in an effective, efficient and safe manner. Whoever is employed by the Sisters of Mercy, either in a pastoral or voluntary role, must be recruited safely and deemed suitable for the role that they are being asked to undertake.

Safe Recruitment Means That The Sisters of Mercy Will Ensure That:

- All reasonable steps are taken to ensure that the Sisters of Mercy eliminates applicants who might pose a risk to Children;
- Those engaged in the recruitment process are suitably trained and experienced to undertake this task;
- The Sisters of Mercy, recruitment procedures are transparent, adhere to best practice and comply with the rules of natural justice, appropriate record-keeping and human resource management;
- The Congregation of the Sisters of Mercy is committed to the policy of inclusion and equality.

Appointment Procedures (Sisters of Mercy)

Within the Congregation of the Sisters of Mercy, the following procedure must be completed. All Sisters should have gone through a formation programme that should include safeguarding Children. In addition to this, the Sisters of Mercy must ensure the following takes place prior any appointment:

- Ensuring each Sister signs the Agreement Form to follow the Congregation of the Sisters of Mercy policy and Child Safeguarding Standards;
- Requiring each Sister to undergo relevant Vetting/Clearance Procedures (Guidance 1.1B);
- Ensuring the volunteer is inducted in the Congregation of the Sisters of Mercy Child Safeguarding Policy (Guidance 5.1A) and that they agree to follow the policy and the procedures of the Congregation by signing two Agreement Forms (Guidance 5.1A Template 1 and Guidance 5.1A Template 2);
- Ensuring the Sister agrees to work within the Congregation of the Sisters of Mercy Code of Behaviour (Guidance 1.2A);
- Ensuring that each Sister attends training, in particular Child Safeguarding training detailed under Standard 5: Training and Support for Keeping Children Safe.

If a cleric or a religious who is not part of the Sisters of Mercy applies for a voluntary or paid role within the Congregation of the Sisters of Mercy, they must follow the recruitment procedures for paid or voluntary staff. If the cleric or religious is visiting the Congregation of the Sisters of Mercy and is seeking to minister, the procedures outlined in Guidance 1.1C must be followed.

Recruitment Procedures (Employees)

The following procedures apply to the process of all appointments. It should be noted that these procedures do not affect the applicant's rights under the relevant employment legislation.

- Use a recruitment and selection checklist to ensure that effective practices are followed (1.1A Template 1). Leave out?
- Use an application form, including reference requests (1.1A Template 2).
- Interview applicants to discuss their application form. This interview will include applicants being advised of their responsibilities towards Children, and assessment of their suitability will include an awareness of Child protection and safe care practices.
- Interview boards will be comprised of experienced and qualified personnel with a proven ability to draw out and explore the information that the candidate has included on their application form.
- All paperwork associated with the application process should be kept in accordance with record storage policy (Appendix B). All references, reports and communications in respect of the applicant should be in writing, and access to them will only be available to appropriate personnel within the Congregation of the Sisters of Mercy. Candidates will be advised that their application and the follow-up process of recruitment will be dealt with in the strictest confidence.
- The successful applicant will be offered a position subject to:
 - a. Suitable references (1.1A Template 4);
 - b. Signing a declaration form (1.1A Template 3);
 - c. Proof of qualifications, where applicable;
 - d. Relevant vetting/clearance procedures (Guidance 1.1B);
 - e. Positive proof of identification.
- It should be noted that any lay person who is coming to work or volunteer in Ireland, who worked or volunteered in another country for more than one year, must provide a certificate of police clearance from the country or countries in which they have lived for a year or more, prior to coming to Ireland. Advice and support in obtaining a police clearance certificate can be found at www.fingerscan.ca and also at www.coru.ie/en/registration/police_clearance.

Once Appointed, The Following Elements are Critical:

- Ensure probationary periods are served, where appropriate;
- Ensure that personnel are inducted in the Congregation of the Sisters of Mercy Child safeguarding policy (Guidance 5.1A) and that they agree to follow the policy and the procedures of the Congregation of the Sisters of Mercy by signing an agreement form (Guidance 5.1A Template 1);
- Ensure professional support, supervision and appraisals are offered to personnel, where appropriate (Guidance 5.6A);
- Provide ongoing training to Sisters of Mercy personnel, in particular Child Safeguarding training detailed under Standard 5: Training and Support for Keeping Children Safe.

Recruitment Procedures (Volunteers)

Reasonable steps should be taken to ensure that all volunteers who work with Children in the Congregation of the Sisters of Mercy are assessed as 'safe'. This includes conducting the following procedures for all volunteers:

- Vetting through the Garda Vetting Bureau/AccessNI (Guidance 1.1B). It should be noted that any lay person who is coming to work or volunteer in Ireland, who worked or volunteered in another country for more than one year, must provide a certificate of police clearance from the country or countries in which they have lived for a year or more, prior to coming to Ireland. Advice and support in obtaining a police clearance certificate can be found at www.fingerscan.ca and also at www.coru.ie/en/registration/police_clearance;
- Requiring the volunteer to sign a declaration form stating that there is no reason why they would be considered unsuitable to work with Children (Guidance 1.1A Template 3);
- Ensuring the volunteer is inducted in the Congregation of the Sisters of Mercy Child safeguarding policy (Guidance 5.1A) and that they agree to follow the policy and the procedures of the Congregation of the Sisters of Mercy by signing an agreement form (Guidance 5.1A Template 1);
- Ensuring the volunteer agrees to work within the Congregation of the Sisters of Mercy's Code of Behaviour (Guidance 1.2A);
- Ensuring the volunteer agrees to report all safeguarding concerns to the appropriate DLP of the Sisters of Mercy (Standard 2.1A).
- Considering whether to ask the volunteer to complete an adapted version of the application form (1.1A Template 2) if it is relevant to the role.

1.1A Template 1: Recruitment and Selection Checklist

Contact with Children	<ul style="list-style-type: none"> • What contact with Children will the position involve? • Will the position involve unsupervised contact with Children, or does it involve a position of trust? • What other forms of contact will the person have with Children, e.g. email, telephone? 	
Defining the Role	<ul style="list-style-type: none"> • Have the tasks and skills necessary for the position been considered? • Does the task description make reference to working with and having responsibility for Children? 	
Key Selection Criteria	<ul style="list-style-type: none"> • Has a list of essential and desirable qualifications, skills and experience been developed? 	
Written Application	<ul style="list-style-type: none"> • Have all applicants been asked to supply information in writing, including personal details, past and current work/volunteering experience? • Have application forms been developed? 	
Interview	<ul style="list-style-type: none"> • Have at least two representatives been identified to meet with the applicant to explore information contained in their application? • Have the applicant and application forms been carefully considered, highlighting points to raise at interview, including: <ul style="list-style-type: none"> • The applicant's attitudes towards working with Children; • Areas you want to explore in more detail; • Gaps in employment history; • Vague statements of unsubstantiated qualifications; • Frequent changes of employment? 	
Declaration	<ul style="list-style-type: none"> • Has the successful applicant been asked to sign a declaration stating that there is no reason why they would be considered unsuitable to work with Children? • Has the successful applicant been asked to declare any past criminal convictions and cases pending against them? 	
Identification	<ul style="list-style-type: none"> • Have applicants been asked, where necessary, for photographic documentation to confirm their identity and place of residence? • Will documentation relating to the applicant's identity and relevant qualifications be checked at the interview? 	

<p>Qualifications</p>	<ul style="list-style-type: none"> • Are applicants asked for documentation to confirm their qualifications? 	
<p>Vetting Procedure/ AccessNI</p>	<ul style="list-style-type: none"> • Does the position require the applicant to be vetted/AccessNI checked? • Has the applicant been informed that they may need to undergo vetting/AccessNI before they take up any appointment? Does this applicant require a certificate of police clearance from other countries in which they have worked/ volunteered? 	
<p>Records</p>	<ul style="list-style-type: none"> • Are details of the selection/induction process retained in the personnel file of the successful applicant? Are references kept on file as part of the record of the recruitment process? • Are personnel informed that information such as application and declaration forms are held on file? 	
<p>Confidentiality</p>	<ul style="list-style-type: none"> • Is information about the applicant only seen by those directly involved in the recruitment process? • Are applicants reassured that information about them, including information about convictions, will be treated in confidence and not used against them unlawfully? 	
<p>References</p>	<ul style="list-style-type: none"> • Are applicants asked to supply the names of two referees who are not family members, or who are not involved in the recruitment process, and ideally who have first-hand knowledge of the applicant's experience of work/contact with Children? • Are referees asked specifically to comment on the applicant's suitability to work with Children? • Are all references provided in writing and verified by a follow-up telephone call? 	
<p>Suggested Questions for Referees</p>	<ul style="list-style-type: none"> • The post involves substantial access to Children. We are committed to the welfare and safeguarding of Children. Have you any reason at all to be concerned about this applicant being in contact with Children? • How long have you known this person? • In what capacity? • Would you have any hesitation in them taking up this position? 	

1.1A Template 2: Application Form

Personal

First Name:

Surname:

Name of Mercy Province:

Have you been previously known by any other names?

Address:

Telephone Number:

Email:

Work Experience

Please detail below the experience you have gained in your professional life

Have you previously been involved in voluntary work? If yes, please give details

Why do you want to get involved in this activity?

Have you previously received any training for working with Children or Young people?
If yes, please give details

Do you have any specific needs that we need to be made aware of?

Please provide any other relevant information below

Referees

Please provide the names and contact details of two people whom we could contact for a reference (not relatives).

Referee 1

Name: _____

Address: _____

Telephone Number: _____

Email: _____

Referee 2

Name: _____

Address: _____

Telephone Number: _____

Email: _____

Declaration

I declare that I have completed this form truthfully, and that I agree to abide by and accept the terms and conditions of my involvement, if successful in the application process.

Signed: _____

Date: _____

1.1A Template 3: Character and Personal Reference Request

Dear _____ (Insert name),
Your name has been given to us by _____ (insert applicant name), who
has applied for the position of _____ (insert name of position).

I would appreciate you completing, signing and dating the information below and returning it to me at the enclosed address.

Thank you in advance for your help.

Yours sincerely,

(Insert Signature and Date)

1) Can you tell us how long you have known the applicant?

2) In what capacity do you know the applicant?

3) Can you highlight some of the applicant's positive skills and qualities?

4) Do you, without reservation, recommend the applicant for the position for which they have applied? Please bear in mind that this position involves working with Children.

Yes No

Why? _____

Please include any additional comments below

Signed: _____

Date: _____

1.1A Template 4: Confidentiality Declaration

I confirm and declare that all confidential and personal information that is disclosed to me or to which I have access during the course of acting as _____ will be kept strictly confidential, and shall:

- a. not be disclosed or otherwise made available by me to any person, except in accordance with the procedures set out in the safeguarding Children policy and procedures;
- b. be used by me only for the purpose of the procedures set out in the safeguarding Children policy and procedures.

If I am required to disclose confidential or personal information in accordance with law or by virtue of a court or similar order, other than in accordance with the safeguarding policy and procedures, nothing in this declaration prevents me from doing so. However, in those circumstances, I will inform the relevant Provincial Leader without delay.

I acknowledge that some or all of the confidential and personal information may contain 'personal data' and 'sensitive personal data' within the meaning of data protection legislation, and I therefore agree to comply with my obligations under this legislation. In so far as I am the data processor in accordance with the Data Protection Acts,¹ then I agree only to process personal data on, and subject to, the instructions of the relevant data controller, maintain appropriate security measures against all unlawful processing in respect of the personal data, and allow the relevant data controller to monitor and audit my compliance with my obligations in respect of personal data.

My obligations under this declaration continue even after I may cease to act as

a _____

Signed: _____

Dated: _____

¹ Data Protection Act 1988 and 2003 (ROI); Data Protection Act 1998 (NI)

1.1B Guidance on Vetting

1. The Catholic Church's Standards and Expectations

It is essential that those people who work in any capacity with Children² and Young people are, as far as possible, assessed to ensure that they do not present a risk to Children. Standard 1 provides the required standard of practice in relation to recruitment and selection. It also provides a checklist for engaging proper procedures when taking on staff and volunteers who will be working with Children.

One part of the recruitment process is to screen applicants against police criminal conviction and caution records. This screening process – called vetting – includes a check against relevant police-held conviction and non-conviction information, against UK lists of individuals who have been barred from working with Children and/or vulnerable adults,³ and, in the Republic of Ireland, against An Garda Síochána records.

This document sets out the relevant legislation, and it provides guidance on who should be vetted and on the procedures that apply in both the Republic of Ireland and in Northern Ireland.

2. Vetting in the Republic of Ireland (ROI)

2.1 Legislative Basis

In the ROI, vetting is carried out through the National Vetting Bureau under the National Vetting Bureau (Children and Vulnerable Adults) Act 2012. From the date of commencement of the legislation on 27 April 2016, it is a criminal offence to allow anyone to engage in ministry with Children or vulnerable adults, without having them vetted first.

In addition, Section 26 of the Sex Offenders Act 2001 means that it is a criminal offence for some people who are guilty of certain criminal offences to fail to notify their employers of this fact before taking a job or performing a service. It is a requirement under this legislation for a prospective employee or volunteer to inform the employer of offences committed in Ireland and abroad.

Section 26 of the Sex Offenders Act 2001 makes it an offence for a person to:

- a. Apply to be employed to do relevant work;
- b. Enter into a contract of employment to do relevant work;
- c. Apply to another person to do relevant work on that other person's behalf (either paid or voluntary);
- d. Enter into a contract of services to do relevant work without, during the course of the application or before entering into the contract, informing the other person or party that they have been convicted of a sexual offence.

² A Child is defined as anyone under eighteen years.

³ Any work or activity that is carried out by a person, a necessary and regular part of which consists mainly of the person having access to, or contact with, Children (and/or vulnerable adults).

The 2012 National Vetting Bureau Act (as amended in the Criminal Justice [Spent Convictions and Certain Disclosures] Act 2016) sets out circumstances that require vetting, defined as:

Any work or activity which is carried out by a person, a necessary and regular part of which consists mainly of the person having access to, or contact with, Children (and/or vulnerable adults).

Good Childcare practice means that, as far as possible, management and supervision arrangements are such that substantial, unsupervised access to Children is limited.

Under Schedule 1, Part 1, Paragraph 7, the Act also requires:

Vetting in respect of any work or activity as a minister or priest or any other person engaged in the advancement of religious beliefs, to Children (and vulnerable adults) unless such work or activity is merely incidental to the advancement of religious beliefs to persons who are not Children (or vulnerable adults).

In other words, anyone who has contact with Children (and vulnerable adults) which is more than incidental as part of their ministry must be vetted. Those who are aged 16 and under 18 may be vetted, but this can only be carried out with the written consent of their parent/guardian and the young person themselves.

Sisters of Mercy who are in active ministry with children and/ or vulnerable adults in both Northern Ireland and the Republic of Ireland, must be vetted in both jurisdictions.

For other personnel of the Sisters of Mercy who may come into contact with but who do not work directly with Children (or vulnerable adults) in the Congregation, vetting is not required.

2.2 The Legislation Provides Relevant Definitions

Harm, in relation to a person, means exploitation or abuse, whether physical, sexual or emotional;

Relevant organisation means a person (including a body corporate or an unincorporated body of persons).

So, for the purposes of the Act, the Catholic Church and all of its subdivisions, including the Congregation of the Sisters of Mercy, is deemed to be a relevant organisation that:

- I. employs (whether under contract of employment or otherwise) any person to undertake relevant work or activities;
- II. enters into a contract for services with any person for the provision by that person of services that constitute relevant work or activities;
- III. permits any person (whether or not for commercial or any other consideration) to undertake relevant work or activities on the person's behalf;
- IV. is a provider of courses of education or training, including internship schemes, for persons and, as part of such education or training or scheme, places or makes arrangements for the placement of any person in work experience or activities where a necessary part of the placement involves participation in relevant work or activities, but does not include an individual who does any of the matters referred to in *subparagraphs (i) to (iv)* in the course of a private arrangement.

Relevant work or activities relating to Children⁴ means any work or activity that is carried out by a person, **a necessary and regular part of which** consists mainly of the person having access to, or contact with, Children in:

- An establishment that provides preschool services within the meaning of Part VII of the Child Care Act 1991;
- A school or centre of education, both within the meaning of the Education Act 1998;
- Any hospital or healthcare centre that receives, treats or otherwise provides services to Children;
- Any work or activity that consists of treatment, therapy or counselling provided to a Child by a person in the course of that work or activity;
- Any work or activity that consists of care or supervision of Children, unless the care or supervision is merely incidental to the care or supervision of persons who are not Children;
- Any work or activity that consists of the provision of educational, training, cultural, recreational, leisure, social or physical activities (whether or not for commercial or any other consideration) to Children, unless the provision of educational, training, cultural, recreational, leisure, social or physical activities is merely incidental to the provision of educational, training, cultural, recreational, leisure, social or physical activities to persons who are not Children;
- Any work or activity that consists of the provision of advice, guidance, developmental or counselling services (including by means of electronic interactive communications) to Children, unless the provision of the advice, guidance, developmental or counselling service is merely incidental to the provision of those services to persons who are not Children;
- Any work or activity as a minister or priest or any other person engaged in the advancement of any religious beliefs;
- Work as a driver of a public service vehicle, which is being used only for the purpose of conveying Children.

⁴ Please refer to the legislation for the complete list.

Register of Vetted Persons: the chief bureau officer will establish and maintain a register of vetted persons who were or are the subject of applications for vetting disclosure, in accordance with the legislation.

The register of vetted persons shall contain the following information regarding each vetted person:

- a. His or Her forename(s), surname and, where appropriate, maiden name;
- b. His or Her mother's maiden name;
- c. His or Her address;
- d. His or Her previous addresses (if any);
- e. His or Her date of birth, place of birth and nationality;
- f. His or Her passport number (if available);
- g. His or Her personal identification number (if any);
- h. The date of application for vetting disclosure and the outcome of the application;
- i. The name and particulars of the relevant organisation making the application for vetting disclosure;
- j. The relevant work or activity to which the application relates;
- k. Declaration of consent referred to in Section 13 (4) (e);
- l. Particulars of the vetting disclosures made in respect of the vetted person;
- m. Such other particulars as the bureau considers appropriate.

2.3 The Congregational of the Sisters of Mercy as a Relevant Organisation Cannot:

- a. Employ (whether under contract of employment or otherwise) any person to undertake relevant work or activities;
- b. Enter into a contract for services with any person for the provision by that person of services that constitute relevant work or activities;
- c. Permit any person to undertake relevant work or activities on behalf of the organisation (whether or not for commercial or any other consideration);
- d. In a case where the relevant organisation is a provider of any course of education, training or scheme, including an internship scheme, place or make arrangements for the placement of a person as part of such education, training or scheme, if a necessary and regular part of such placement requires the participation by the person in relevant work or activities, unless the organisation receives a vetting disclosure from the bureau in respect of that person.

A person who performs any of the matters listed in paragraphs (a) to (d) above without a vetting disclosure from the bureau shall be guilty of an offence.

2.4 Reporting information to the National Vetting Bureau According to the Act (Section 2)

The Congregation of the Sisters of Mercy is not defined as a scheduled organisation according to the Act (Section 2), and is therefore not required to report specified information to the National Vetting Bureau. However, information about a member of the Congregation of the Sisters of Mercy may be reported to the bureau.

A scheduled organisation has a duty to notify the bureau in writing, where, following an investigation, inquiry or regulatory process, there is a bona fide concern that the person, may:

- a. Harm any Child or vulnerable person;
- b. Cause any Child or vulnerable person to be harmed;
- c. Put any Child or vulnerable person at risk of harm;
- d. Attempt to harm any Child or vulnerable person;
- e. Incite another person to harm any Child or vulnerable person.

If any specified information furnished by a scheduled organisation to the bureau is incorrect or is otherwise inaccurate, the scheduled organisation will, as soon as may be, after becoming aware of its being incorrect or inaccurate, as the case may be, inform the bureau thereof.

2.5 Catholic Church Requirements

The Sisters of Mercy are registered with the National Vetting Bureau and have appointed **authorised liaison persons**, who are registered by the bureau. It is the responsibility of the liaison person to ensure that vetting application forms are completed accurately and in full. Registration and vetting checks can now be carried out online and for more information follow this link <https://vetting.garda.ie>

The form that is completed by the applicant gives permission for a vetting disclosure to be obtained and shared with the relevant personnel within the Sisters of Mercy, in line with data protection legislation. The applicant must give their permission for information to be shared with named relevant people (i.e. the employer and the DLP). The application must identify the relevant work to which the application relates, and must be specific about access to Children or vulnerable adults being a necessary and regular component of the role.

National Bureau vetting is one method of ensuring that those people about whom there are concerns of a relevant nature are not engaged to work with Children. The vetting return must be assessed by the employing person (local Leader, chair of board of management, etc.) to ensure that risk is minimised. Personnel accessing vetting disclosures must also observe confidentiality and must be made aware of the consequences of a breach of confidentiality.

If the vetting disclosure contains information that might mean an applicant is unsuitable for the post, the employer must make a copy of the disclosure available to the applicant to establish first that the identity details are correct, and second, whether the information shared means that the application must not proceed.

If the applicant wishes to appeal the decision not to employ, the Sisters of Mercy must set up a review panel meeting (see Section 6 on appeals).

3. Vetting in Northern Ireland (pre-employment)

3.1 Legislative Basis

The Police Act 1997 (Criminal Records) (Disclosure) is the legislation that allows for an enhanced criminal record check for those engaged in regulated activities with Children and vulnerable adults.

The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 sets out the activities and work that are 'regulated activities', which a person who has been barred by the Disclosure and Barring Service must not do.

Vetting is carried out in Northern Ireland if a paid member of staff or volunteer is to engage in a **regulated activity** (explained below). An enhanced check can disclose non-conviction information or 'soft intelligence' if the police consider it is relevant to the role. This could be an incident that did not go to court, or information about an ongoing police investigation.

An enhanced check also includes a barred list check for anyone applying to do paid or voluntary work that is a regulated activity. A barred list check involves checking whether the individual is part of barred lists of people who are prevented from doing certain types of work.

3.2 Definitions

A Child is defined by the Safeguarding Vulnerable Groups Order (SVGO) as anyone who has not attained the age of eighteen years.

The full, legal definition of regulated activity is set out in Schedule 2 of the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, as amended (in particular, by the Protection of Freedoms Act 2012).

Regulated activity excludes family arrangements, and personal, non-commercial arrangements.

Regulated Activity Relating to Children

The Amended Definition of Regulated Activity Comprises:

- I. Activities such as teaching, training, instructing, caring for or supervising Children, or providing advice/guidance on well-being, or driving a vehicle only for Children;
- II. Work for a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, Children's homes, Childcare premises, a Children's hospital. Work under (i) or (ii) is regulated activity only if done regularly.
- III. Relevant personal care, e.g. washing or dressing; or healthcare by, or supervised by, a professional;
- IV. Registered Childminding and foster care.

3.3 Catholic Church Requirements

In relation to the Congregation of the Sisters of Mercy, those who work (paid or unpaid) in a regulated activity will require vetting. Legislation allows for the Congregation of the Sisters of Mercy to carry out vetting checks for those who are in day-to-day line management of those in regulated activities, and who must also be vetted.

As the definition of regulated activity has recently changed, it is current practice that those falling under the previous definition of regulated activity, who are not included in the new definition listed above, still require vetting. However, the vetting enhanced check will not include the barred list element.

Sisters of Mercy who are active in Northern Ireland and the Republic of Ireland and who meet the legislative requirements in each jurisdiction, must be vetted in both the Republic of Ireland and Northern Ireland.

3.4 How to Apply for a Vetting Check

For a detailed guide and further information on how to apply for a vetting check in Northern Ireland, please contact the relevant Provincial Offices.

4. Re-Vetting

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

5. Storage and Retention of Records

The Sisters of Mercy have appointed a data protection officer to ensure that all records are retained, stored and destroyed appropriately (see Appendix B). Consideration should be given to the storage of Application forms, references and any other records of vetting checks will be stored in line with data protection legislation. All records should be retained at least until the conclusion of the vetting process.

In ROI, the office of the Data Protection Commissioner recommends that vetting disclosures should be routinely deleted one year after they are received except in exceptional circumstances. In case of future queries or issues in relation to a vetting disclosure, the reference number and date of disclosure may be retained on file and this can be checked with an Garda Síochána. This practice is sufficient for all organisations engaged in vetting, including organisations subject to external statutory inspection of staff vetting practices

In Northern Ireland, the Vetting Disclosure Certificate is forwarded by Access NI directly to the applicant. The applicant may decide to share the content of the Vetting Disclosure Certificate with the authorised signatory. The authorised signatory retains a record of the reference number and the date when the Vetting Disclosure Certificate was presented. The only exclusion is if the applicant appeals the decision of the authorised signatory (see Section 6 on appeals, on the next page). In this instance the record should be retained for three months, following completion of the appeal process.

In Northern Ireland, a record of the check having been carried out should be retained for a period of twenty years after the end of the period of employment (this also applies to volunteers).

6. Appeals

It must be noted that any appeal can only be made in relation to the decision of the Sisters of Mercy not to employ the candidate (paid or voluntary), on the grounds that they are not suitable to work with Children. The Sisters of Mercy have no role in reviewing the contents of the disclosure by the National Vetting Bureau or AccessNI. If there is a disagreement about the disclosure, the applicant must appeal directly to the National Vetting Bureau or AccessNI.

The employer will assess the information returned from AccessNI or the National Vetting Bureau and decide if there is any reason not to employ the applicant, from a criminal information perspective. The applicant will be informed that their application cannot proceed based on the information returned through the vetting process.

If the applicant wishes to appeal the decision of the Sisters of Mercy, they should be informed in writing about the process of an appeal.

An appeals panel will be established by the Provincial Leader or their delegate to hear the appeal.

The National Vetting Bureau (Children and Vulnerable Persons) Act 2012 states that the information contained in the vetting disclosure made to the organisation shall not be used or disclosed by the relevant organisation other than in accordance with the Act. Any breach of this requirement is an offence. Therefore, prior to engaging in any appeals process, legal advice should be sought.

An applicant in Northern Ireland will be told that the appeal process will require that information disclosed to AccessNI is shared with the panel members, and that any representations made by him/her may be shared with the statutory authorities. Any detail provided, for example to explain the background to a conviction, will be shared with AccessNI to ensure it is a realistic representation of the facts.

Representation from the applicant will be requested in writing to offer them the opportunity to explain any circumstances in relation to the information received that might further inform the appeals panel. The panel may permit an oral hearing if it is deemed necessary for the fair and just disposition of the appeal.

The role of the appeals panel is to decide if the original decision was unreasonable or irrational. In the first instance, the panel will communicate its view to the Provincial Leader. The Provincial Leader should take cognisance of the views of the appeals panel. The applicant will then be informed in writing of the final decision following a review by the Provincial Leader, based on the advice of the appeals panel.

6.2 Constitution of Panel

The Provincial Leader or their delegate will appoint an appeals panel. The following people should be considered as appropriate members of the panel:

- Chair of the Safeguarding Committee;
- Local Leader/HR Co-ordinator/Representative of the Sisters of Mercy
- Lay person with Child protection experience.

Advice can be sought from the following: a representative from the HR advisers for the Sisters of Mercy; a civil law solicitor; a canon lawyer; and/or an employment lawyer.

6.3 Role of Panel

- To receive and hear requests for review of decisions not to appoint on the basis of information received through the vetting process:
 - To review the written information provided by the applicant and, and to receive oral evidence from the applicant and relevant personnel of the Sisters of Mercy if deemed appropriate
- To make a judgement regarding whether the decision not to employ was reasonable:
 - Was the decision to refuse based on a potential risk to Children?
 - Was the relevance of the specific role taken into consideration?

If it is determined that the final decision regarding the appeal rests with the Provincial Leader, the Appeals Panel must report its recommendation to the Provincial Leader for consideration.

6.4 Time Frame

- An appeal must be lodged with the employer within twenty-eight days of being informed of the decision not to appoint. The appellant will be asked to provide written representation within fourteen days of receipt of correspondence requesting this. Failure to provide this information within the time frame suggested, or failure to seek an extension, will result in the matter being closed and the original decision standing.
- The Appeals Panel will aim to review all information within fourteen days of receipt of the same, and communicate its views in writing to the Provincial Leader.
- The Provincial Leader will communicate their decision in writing to the applicant

1.1C Guidance for Visiting Persons in any Form of Consecrated Life Within and Outside Ireland

- a. Prior to their visit, where there is an intention to engage in public ministry, all visiting religious must write seeking permission of the Provincial Leader, giving details about the duration of the visit, the type of ministry and the location of ministry being considered. Contact details of the Provincial Leader of the visiting religious must be provided in advance;
- b. Upon receipt of request from the visiting religious to carry out ministry, the Provincial Leader must acknowledge the same, and then make a request in writing to the visitor (1.1C Template for a confirmation of good standing (1.1C Template 5), signed by their Provincial Leader;
- c. A vetting check must be processed through the Garda National Vetting Bureau/AccessNI (Guidance 1.1B);
- d. If the Provincial Leader is satisfied that there are no concerns about the visiting religious, permission should be given in writing to the visitor, outlining the specified ministry, including its duration and location (1.1C Template 4);
- e. A copy of this permission (1.1C Template 4) should be forwarded to the Provincial Leader of the visitor, and also to the parish priest or local Leader of the location of the ministry outlined in the letter;
- f. A copy of the permission (1.1C Template 4) should be stored in Provincial House, in line with confidentiality and storage of information (Appendix B).

1.1C Template 1: Acknowledgement Letter for Request for Ministry

Dear _____ (insert name),

I write in response to your letter dated _____ (insert date), regarding your wish to minister within the Congregation of the Sisters of Mercy.

Thank you for your enquiry and your willingness to be of service. Prior to considering any temporary appointment, our procedures require that you contact your Local Leader/Provincial Leader to inform them of your request.

Please complete the attached forms and forward them to your Local Leader/Provincial Leader for completion, if they wish to recommend you for ministry in the Sisters of Mercy in this Province.

With every blessing,

(Provincial Leader)

Visiting clergy/Sisters refers to those seeking to minister on a short-term basis, for a special event, during holidays, or as part of mission/retreat or other pastoral activity.

1.1C Template 2: Approval for Ministry

Dear _____ (insert name of Applicant),

I wish to confirm that you are authorised to Minister in (insert the Sisters of Mercy, name of Province) as follows:

In _____ (insert Location)

Duration: _____ (Insert Start and End Date)

Type of Ministry: _____ (Insert Specified Ministry)

I will retain a copy of this letter, and a copy has been forwarded to your Provincial Leader and to the Local Leader of the Location in which you will be ministering.

With every blessing,

(Insert Signature of Provincial Leader)

(Insert Date signed by the Provincial Leader)

1.1C Template 3: Confirmation of Good Standing for Non-Ordained Religious

Questionnaire to be completed by the Provincial Leader when a Sister or Brother or other person from the Province or Region is applying for Ministry, including working with Children (long term or for a shorter period) in another Province or Region of the Congregation.

Name of person applying for Transfer: _____

Name of his/her Province/Region: _____

1. Why does this Person want to Minister in the Province/Region of the Congregation?

2. Does he/she seek the transfer with a view to permanence? Yes No

3. Is he/she coming temporarily? Yes No

4. If your answer is **yes** above, how long does he/she intend to stay? _____

5. Have you any specific concerns about the performance of his/her ministry? Yes No

If yes, please state your reasons below.

6. Is there any reason why the above-named person should not be given a position that involves working with Children and Young people? Yes No

If you answered **yes** above, please give an outline of your concerns below

7. Please write any additional comments below

I testify that _____(Name of Applicant) who is applying for Ministry in the _____Province/Region is a person in good standing in the _____Province/Region.

Name (please print) _____

Leadership Position in Province/Region _____

Signature: _____

Date: _____

Return this Form as soon as possible to the Province/Regional Leader of the Province/Region to which the person has applied for a transfer.

1.1D Guidance on Visiting Clerics or Visiting Persons in Any Form of Consecrated Life Ministering at Shrines, National Shrines and International Shrines

Definitions

A Shrine is a Catholic church or other sacred place which with the approval of the local ordinary is by reason of special devotion frequented by the faithful as pilgrims (Canon 1230).

To be considered a National Shrine the approval of the National Episcopal Conference is necessary. For it to be described as International, the approval of the Holy See is necessary (Canon 1231).

For Visiting Clerics or those in any form of consecrated life, ministering in Shrines and National Shrines in Ireland

- Prior to the visit, where there is an intention to engage in public ministry, all visiting clerics and those in any form of consecrated life must follow Guidance 1.1C In particular: If the visiting cleric is ministering at a one-off event which isn't considered a regulated activity (as defined in Guidance 1.1B) the cleric must provide his celebret for inspection by the parish priest or duly delegated person and this should be noted beside the visitors signature in the register.
- If the ministry is for a short term basis, the visiting cleric must follow the requirements set out in Guidance 1.1C.
- If the ministry is being carried out by a non-ordained religious then the guidance outlined in Guidance 1.1C must be followed.

Visiting Clerics celebrating or concelebrating mass at Shrines outside Ireland

- If the Shrine is outside of Ireland all child safeguarding requirements of the organisation within which the ministry takes place must be followed, in accordance with Guidance 2.1J.
- The main celebrant must allocate responsibility for each cleric wishing to concelebrate to have their celebret cards checked to ensure they are in good standing.
- A cleric who is out of ministry due to child safeguarding concerns must not attempt to celebrate any sacrament in public while abroad.

1.1E Overview of Documentation Required for Visiting Clergy, Visiting persons in Any Form of Consecrated Life, or Lay Ecclesial Ministers Seeking to Minister in the Catholic Church in Ireland

In addition to the detailed guidance produced (Guidance 1.1A, 1.1B, 1.1C, 1.1D) the table below provides an overview of requirements. When considering what checks to carry out consider the frequency of the ministry, level of contact with children and risks. The template provides guidance, but each Provincial authority must maintain responsibility for ensuring the safety of children and make a decision about appropriate checks in each unique circumstance.

Table 1: Once Off Cover (1-3 days- Including single events, weekend cover, self retreat)

	Irish diocesan cleric	Ordained Religious within Ireland	Non Ordained Religious within Ireland	Diocesan cleric from outside Ireland	Ordained Religious from outside Ireland	Non Ordained Religious from Outside Ireland	Irish Lay Minister	Lay Minister from Outside Ireland
Show Celebret/ Letter of Good Standing to Receiving Jurisdiction (Guidance 1.1C)	YES	YES	YES	YES	YES	YES	Letter from their Church Authority/ manager	Letter from their Church Authority/ manager
Vetting by own Church body/ External Organisation	YES	YES	YES	YES	YES	YES	YES	YES
Vetting in Receiving Jurisdiction (Guidance 1.1B)	NO	NO	NO	NO	NO	NO	NO	NO
Approval for Ministry from Receiving Church Authority	YES	YES	YES	YES	YES	YES	YES	YES
Declaration of Good standing from Cleric/Religious Ordinary (1.1C Template 3)	NO	NO	NO	NO	NO	NO	NO	NO
Declaration of Good standing from Cleric/ Religious	NO	NO	NO	NO	NO	NO	NO	NO
Confidential Declaration Form (1.1A Template 4)	NO	NO	NO	NO	NO	NO	NO	NO
Induction Agreement Form (5.1A)	NO	NO	NO	NO	NO	NO	NO	NO

Table 2: Short Term Cover (More than 1-3 days- including regular and repeated events)

	Irish diocesan cleric	Ordained Religious within Ireland	Non Ordained Religious within Ireland	Diocesan cleric from outside Ireland	Ordained Religious from outside Ireland	Non Ordained Religious from Outside Ireland	Irish Lay Minister	Lay Minister from Outside Ireland
Show Celebret/ Letter of Good Standing to Receiving Jurisdiction (Guidance 1.1C)	YES	YES	YES	YES	YES	YES	Letter from their Church Authority/manager	Letter from their Church Authority/manager
Vetting by own Church body/ External Organisation	YES	YES	YES	IF POSSIBLE	IF POSSIBLE	IF POSSIBLE	YES	IF POSSIBLE
Vetting in Receiving Jurisdiction	YES	YES	YES	YES	YES	YES	YES	YES
Approval for Ministry from Receiving Church Authority (1.1C)	YES	YES	YES	YES	YES	YES	YES	YES
Declaration of Good standing from Cleric/Religious Ordinary (1.1C Template 3)	YES	YES	YES	YES	YES	YES	N/A	N/A
Declaration of Good standing from Cleric/Religious	YES	YES	YES	YES	YES	YES	N/A	N/A
Confidential Declaration Form (1.1A Template 4)	YES	YES	YES	YES	YES	YES	N/A	N/A
Induction Agreement Form (5.1A Template 1)	YES	YES	YES	YES	YES	YES	N/A	N/A

1.2A Guidance on Codes of Behaviour for Adults

The recruitment of suitably qualified and experienced personnel is a vital aspect of the Congregation of the Sisters of Mercy Child safeguarding policy. However, in order to maintain a high level of Child protection awareness and safe care, codes of behaviour are equally important.

A Code of Behaviour is a clear and concise guide to what is and is not acceptable behaviour and practice when working with Children. It is an essential part of the safeguarding procedures of any Church body that has ministry with Children. Adults working with Children have a duty of care to Children. All personnel of the Sisters of Mercy who work with Children should sign a Code of Behaviour (if it is not contained in the overall safeguarding policy) to indicate that they have seen the code and agree to follow it in full from commencement of their work within the Congregation.

It is very important that everyone involved with the Sisters of Mercy is clear about what is and is not acceptable behaviour when working with Children. It is also important to involve Children and parents/guardians in the process of developing a Code of Behaviour. When considering what sorts of behaviour are appropriate in dealing with Children, it is important to bear in mind that the intentions of adults are less important than the impact of their behaviours on Children. For this reason, a key aspect of any Code of Behaviour is the creation of an environment where it is safe for Children to ask questions and express their concerns, confident in the knowledge that what they say will be heard, taken seriously and acted upon.

In general, Codes of Behaviour should contain:

- Positive statements indicating what sorts of behaviours are appropriate, e.g. listening;
- An awareness of the scope of bullying and how to cope with the problem, as it may occur in any group context;
- Prohibitions indicating behaviours that are never acceptable, e.g. hitting a Child;
- Good practice guidelines that indicate what is generally acceptable or unacceptable, but that also allow for exceptions, e.g. in a medical emergency; taking a Child in your car without a second member of staff/adult if there is no one else around.

Where it becomes necessary to depart from the Code of Behaviour, the reasons for doing so should be carefully recorded, and steps should be taken to avoid the recurrence of such a situation in the future.

1.2A Template 1: Code of Behaviour for Adults

Congregation of the Sisters of Mercy Codes of Behaviour

A Code of Behaviour is a clear and concise guide of what is and is not acceptable behaviour and practice. It is important that everyone is clear about what is and is not acceptable behaviour when working with Children. This Code of Behaviour is to be displayed in larger communities and in places of Mercy Ministry with Children.

Mercy Code of Behaviour

The effective implementation of this policy requires commitment by all Sisters of Mercy, employees and volunteers to our Code of Behaviour.

The Code of Behaviour must be signed by each person as an indication of her/his commitment to fully enact it in her/his work with Children.

The Code of Behaviour requires all to:

- ✧ Treat Children with respect and courtesy
- ✧ Respect the boundary of physical and emotional space that others require, using touch in a prudent and responsible way. Touch should only ever be in response to the Child's needs and never in an intrusive or sexualized way
- ✧ Help Children to develop their own sense of their rights as well as helping them to know what they can do if they feel that there is a problem
- ✧ Never develop overfamiliar relationships or create over dependency in relating to Children
- ✧ Be visible to other adults when working with Children
- ✧ Avoid staying in the same room alone with a minor
- ✧ Avoid travelling alone with a minor
- ✧ Ensure whenever possible that another adult is present or close by when providing pastoral ministry to a minor
- ✧ Challenge and report potential abusive behaviour
- ✧ Develop a culture that enables Children to talk openly about their contact with staff or others
- ✧ Do not use inappropriate communication with Children through the internet, e-mail, text messages or otherwise
- ✧ Never condone or participate in behaviour of Children which is illegal, unsafe or abusive
- ✧ Never develop relationships with Children that could be deemed to be exploitative or abusive

- ✧ Ensure that permission of parents/guardians is given when taking photographs and making videos or other recordings of Children in the course of ministry to them
- ✧ Do not engage in any of the following behaviours – striking, slapping, physical or sexual or emotional abuse of any kind including provocative language
- ✧ Never act in a way that is intended to shame, belittle, intimidate or degrade
- ✧ Never provide alcohol or any drug substance to a minor
- ✧ Never provide medication to a minor, this is the responsibility of the parent/guardian.

At the outset, when involved in activities with Children and Young people, a specific code of conduct will be drawn up. This will be done in direct consultation with the Children and Young people. It is important that each group of Children and Young people directly contributes to the formation of their code of conduct.

The Following Is A Sample Code Of Conduct For Children Relating To Children:

- ✧ Be fair,
- ✧ Don't cheat or lie,
- ✧ Be nice to others,
- ✧ Talk to the person in charge if you have a problem,
- ✧ Be careful of the property of others,
- ✧ Don't bring anything that might cause harm to yourself and others
- ✧ During group activities mobile phones will be switched off.

All participating Children and Young people must sign and adhere to the agreed Code.

The Following Points are applied as a Minimum Standard:

- ✧ Children and Young people will be aware that leaders also have a Code of Conduct
- ✧ Children and Young people will respect the fact that leaders will not work alone with Children and Young people
- ✧ Children and Young people will treat each other and their leaders with courtesy, respect and dignity
- ✧ Children and Young people will not be permitted to consume alcohol or use illicit drugs while participating in Mercy-related activities
- ✧ Inappropriate language or sexually suggestive comments by Children or Young people will not be permitted
- ✧ Physical contact between Children and Young people will be of an appropriate nature at all times.

Guidelines for Dealing with Challenging Behaviour

Many Children and Young people are dealing with complex issues which can lead them to act out negative behaviour that is challenging for leaders and for other Children/ Young people around them. Issues like separation, bereavement, bullying, discriminatory behaviours, eating disorders and addiction can have a huge impact on Children and Young people's self-esteem. We must be sensitive to their needs and remember that safeguarding is much broader than recognising, responding and reporting abuse. It is about ensuring that Children have the help and support they need to be safe.

As leaders dealing with challenging or unacceptable behaviour we should remember that the welfare of the Child is of paramount importance. In order to ensure the safeguarding of Children the following are guidelines for sisters, employees and volunteers:

- ✧ Agree clear behavioural standards and consequences for their breach in advance.
- ✧ Try to defuse situations before they escalate, emphasising safety as the concern.
- ✧ Focus on and affirm appropriate behaviour.
- ✧ Try to help the Child/Young Person who is having a behaviour difficulty to name the feelings; attempt to find out what the problem is and work towards finding a solution.
- ✧ Talk to the Child, in his/her own language, about choosing good behaviour, and make the Child aware of the different consequences following choices made. Inform the Child that she/he will be asked to leave the activity if the behaviour continues to be inappropriate. If necessary take the Child to one side in order to discuss the problem and work together towards finding a solution. Re-integrate the Child positively into the activity as soon as possible.
- ✧ In cases of extreme behavioural difficulties which pose a threat to the Child, staff or other Children/Young people, take the Child to one side and contact the parents immediately.
- ✧ Dealing with Children's challenging/unacceptable behaviour should never involve physical punishment or any form of degrading or humiliating treatment.
- ✧ Record and report any incident of extreme behavioural difficulty to the leader of the activity.
- ✧ Parents/guardians should always be informed of any behavioural issue

1.2A Template 2: Sample Agreement Form Code of Behaviour

Code of Behaviour

Name: _____

Role: _____

I _____

hereby declare that I am familiar with *Safeguarding Children Policy and Standards for the Catholic Church in Ireland 2016**. I have read, understood and agree to comply with the Code of Behaviour as set out therein.

Signature: _____

Date: _____

**A copy of the the full Policy is to be given to the Sisters who are in direct Ministry with Children*

1.3A Guidance on Creating a Code of Behaviour with Children

Children should be involved in drawing up a Code of Behaviour for themselves; however, it is important that in working with Children, an appropriate adult with relevant skills and competencies participates to support them in developing the Code of Behaviour.

The methods used in creating a Code of Behaviour should be age and ability appropriate, with Children being encouraged to avoid merely drawing up a list of prohibitions. Instead, the code should be comprised of positive statements about respect, and should consider what consequences ensue if the code is broken.

In Developing the Code, Consideration Should be Given to the Following:

- ✧ Treating everyone with respect;
- ✧ Treating property with respect;
- ✧ Not consuming alcohol, tobacco or illegal drugs;
- ✧ Agreeing not to bring any physical item into the Church activity that may cause offence or harm to others;
- ✧ Acting as a good role model;
- ✧ Attending activities on time;
- ✧ Signing in and out;
- ✧ Turning off your mobile phone;
- ✧ Telling someone you trust if you feel uncomfortable with any situation or individual;
- ✧ Not using bad language when communicating by phone or email;
- ✧ Never bullying anyone or sending threatening messages.

For an example of a workshop to create a Code of Behaviour with Children, refer to [1.3A Template 1](#)

1.3A Template 1: Example Workshop on Creating a Code of Behaviour with Children

Age Group

Six to ten years old.

Aim

To create a Code of Behaviour, and to work on building trust with the group materials.

Materials

Flip chart page, paper, blu-tack, pens and a small, soft ball.

Method

1. Ask the group to sit in a circle.
2. Say to the group: 'Today I want you all to come up with a list of things you think are important when you're working together: what things help you to work as a team, and what things you like when you come here. But because you all have so many ideas and I'll want to get them all down, only one person can speak at a time. The only person who is allowed to speak is the one who's holding this ball (hold the ball in the air). If you want to speak put your hand up and then I'll pass you the ball. Is everyone clear?'
3. Take the flip chart page and stick it on the wall with blu-tack.
4. Say to the group: 'This page is where we are going to write down the things you think are important to help our group work together. It's called a Code of Behaviour. Everyone in this group has to agree on what goes into this code, which includes rules for adults and Children. But first of all it needs a name. What will the name of this group be?'
5. When the Children have agreed on a name, write it on the centre of the page.
6. Say to the group: 'Now we have to come up with some rules about how we'll all behave in the group, so put your hand up if you want to go first and remember you can't speak without the ball.'
7. Continue around the group in this way, each time writing up a rule that the Children create, or asking the Children to write on the page themselves. The idea is to compromise with the Children, and the rules should cover things like signing in, time for breaks, listening to each other, turning mobile phones off, safeguarding, limits to confidentiality, etc. It should also include discussions about what will happen if an agreed rule is broken.
8. After finishing the previous discussion, say to the group: 'Now that we have established the rules, our agreement isn't complete until we all sign it. If you sign the code you promise to stick to the rules up here. Every time this group meets, this agreement will be stuck up on the wall so that you can see the rules that we have all agreed to. So I'll sign first and then everyone else can come up and sign the page together.'
9. The session ends when everyone in the group has signed the poster. You can develop this further with younger Children by letting them decorate the Code of Behaviour.

1.3B Guidance on Dealing with Breaches of Codes of Behaviour for Children and Adults

If a Child/Young Person or an adult breaches the Code of Behaviour, efforts should be made to resolve the issue by:

- Discussion with and support for the adult or the Child/Young Person;
- A Child/Young Person or adult may be asked to apologise for their behaviour;
- In the case of a Child/Young Person, involving their parents/guardians;
- Agreeing on sanctions.

Sanctions May Include:

- Time out of group activity;
- For Children/Young people, a parent/guardian may be asked to attend group activities with their Child for a period of time;
- For adults, retraining in leadership skills, Code of Behaviour, etc. may be required;
- For Children/Young people, the Code of Behaviour should be revisited and agreed upon;
- Monitoring behaviour and support on an ongoing basis.
- In serious cases, suspension or even exclusion from the group should be considered;
- Formal reporting to statutory authorities.

1.3C Guidance on Anti-Bullying

The Congregation of the Sisters of Mercy recognise the devastating effects and long-term damage that bullying can have on Children/ Young people and we hope to create safe 'bullying-free' environments for our Children/Young people.

What is bullying?

- ❖ Bullying is intentional, repeated and aggressive physical, verbal or psychological behaviour directed by an individual or group against others;
- ❖ Bullying can occur at any age, in any environment, and can be long or short term;
- ❖ Any Child/Young Person can be a victim of bullying;
- ❖ Bullying can be perpetrated by adults towards Children/Young people, as well as Children/Young people towards their peer group;
- ❖ Isolated incidents of aggressive behaviour, which should not be condoned, cannot be described as bullying. However, when the behaviour is systematic and ongoing it is bullying;
- ❖ Bullying results in pain and distress to the victim.

Bullying can be:

- ❖ **Emotional/psychological:** tormenting, excluding, extorting, intimidating, etc.
- ❖ **Physical:** pushing, kicking, hitting, punching, intimidating, damaging/stealing property, or any use of violence, etc.;
- ❖ **Racist:** racial taunts, i.e. insults about colour, nationality, social class, religious beliefs, ethnic or Traveller background, or use of graffiti or gestures;
- ❖ **Sexual:** unwanted physical harassment or contact, or sexually abusive comments. This may constitute actual sexual abuse, which should be reported;
- ❖ **Homophobic:** taunting a person of a different sexual orientation;
- ❖ **Verbal:** name-calling, sarcasm, spreading rumours, teasing, etc.;
- ❖ **Cyber:** misuse/abuse of email, mobile phones, internet chat rooms, social media, text messaging, or camera and video facilities;
- ❖ **Subtle:** such as an unwelcome expression or gesture that is repeated and focused on an individual;

- ❖ **Perpetrated by Adults:** this can include adults who are not related to the Child. When perpetrated by adults, rather than Children, bullying behaviour could be regarded as physical or emotional abuse. However, other major forms of Child abuse – such as neglect and sexual abuse – are not normally comprehended by the term ‘bullying’.

Prevention

To help prevent bullying, the following strategies are suggested:

- ❖ Engage Children/Young people in discussions about what bullying is and why it cannot be tolerated;
- ❖ Encourage Children/Young people to take responsibility and report any incidents of bullying to their leader/person in charge;
- ❖ Review this bullying guidance with Children/Young people and parents involved in parish/agency activities;
- ❖ Seek to promote positive attitudes of social responsibility, tolerance and understanding among all personnel.

Procedures to Deal with Bullying

- ❖ All incidents of bullying should be brought to the attention of the leader/person in charge;
- ❖ All incidents will be recorded on incident report forms and kept on file;
- ❖ Leaders should report to and seek guidance/support from the parish priest/priest in charge;
- ❖ Parents should be informed of any incidents of bullying, and should meet with the leader/person in charge to discuss the problem. A record should also be kept;
- ❖ The bullying behaviour or threats of bullying must be investigated and the bullying quickly stopped;
- ❖ Both the victim and bully should be supported and helped throughout the process;
- ❖ If necessary and appropriate, the Gardaí /PSNI should be consulted.

1.4A Guidance on Safe Care for Children

Our generation will show that it can rise to the promise found in each young person when we know how to give them space. This means that we have to create the material and spiritual conditions for their full development; to give them a solid basis on which to build their lives; to guarantee their safety and their education to be everything they can be; to pass on to them lasting values that make life worth living; to give them a transcendent horizon for their thirst for authentic happiness and their creativity for the good; to give them the legacy of a world worthy of human life; and to awaken in them their greatest potential as builders of their own destiny, sharing responsibility for the future of everyone. If we can do all this, we anticipate today the future that enters the world through the window of the young.

– Pope Francis (2014)

To build a safe and solid environment for Children, all personnel involved with the Congregation of the Sisters of Mercy must strive to be Child-centred in their practice and behaviour. In practical terms, this will include clear written procedures outlined in the following templates and guidance documents.

1.4A Template 1: Attendance Register for Large Groups

A minimum of two officially appointed leaders, who have completed the Sisters of Mercy recruitment process (including the provision of vetting/AccessNI checks, if appropriate), should be responsible for each activity involving Young people. At least one of the leaders must have undergone a full- day training session provided by trainers registered with the NBSCCCI. These leaders must sign this sheet and put their initials under each date to confirm that the Children/Young people and adults marked were in attendance, as indicated by the ‘time in’ and ‘time out’ for each date.

Name (Children and adults)	Date: _____		Date: _____		Date: _____		Date: _____		Date: _____	
	Time in	Time out	Time in	Time out	Time in	Time out	Time in	Time out	Time in	Time out
Leader's Signature	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials
Leader's Signature	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials
Leader's Signature	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials	Initials

Attendance Register

(Please use new page when date changes.
Where date continues from previous page, please re-enter it.)

Date / /

Please use this sheet for other activities for example, music lessons, grinds.

Name of Child	Signature of Adult	Activity/Ministry	Time in	Time out

1.4A Template 3: Child and Guardian Joint Consent

Data Protection

This form will be held on file, in accordance with the data protection policy of the Sisters of Mercy, (insert name of Province). The data entered will be used only for the purpose indicated on the form. It may only be accessed by those with responsibility for managing records or group activities.

Group Details (to be completed by organiser)

Name of Group: _____

Duration/frequency of Activity from
(start date/time): _____

(end date/time): _____

Name of Organiser: _____

Details of the Child/Young Person

Name of Young Person: _____

Address: _____

Date of birth: _____

Gender (circle as appropriate) **Male** **Female**
Contact information of young person (for emergency use only) _____

Other Relevant Information

(Please mention any medical conditions, special needs or dietary requirements).

Please note that the organisers cannot administer any medication. Should your Child require medication or intimate care, please discuss this with the organisers who will work with you to establish how your Child can be accommodated, according to relevant policies and procedures.

Guardian Contact Details

Name: _____

Daytime Phone Number: Code _____ Local no. _____

Home Phone Number: Code _____ Local no. _____

Mobile Number: _____ Email: _____

Contact information for emergency use only (if different from the information given above)**In Cases of a Medical Emergency**

In the event of illness or an accident, I give permission for medical treatment to be administered to my Child, where considered necessary, by a suitably qualified medical practitioner and/or hospital. I understand that every effort will be made to contact me as soon as possible. In an emergency I can be contacted at the telephone numbers provided on the previous page:

Signed: _____

Child's/Young Person's Consent

I _____ (insert full name) would like to take part in the event listed on the previous page.

(If relevant please tick the boxes below)

- I understand that photographs may be taken during the group activities, and I give my permission for these to be used in any hard copy/online (delete as appropriate) publications by The Sisters of Mercy.
- I understand that videos (which may include webcam) may be taken during the group activities, and I give my permission for these to be used in any hard copy/online (delete as appropriate) publications by The Sisters of Mercy.
- I understand that during group activities I will be appropriately supervised at all times and will agree to abide by the group's code of behaviour.

Guardian's Consent

I agree to allow the above-named Child/Young Person to attend meeting(s) of the _____ (insert name of group), at the times and dates stipulated in section 2.0 in accordance with the permission granted by _____ (insert name of Child/Young Person) above.

I understand that there will be suitable supervision and an agreed Code of Behaviour while the Children/Young people are in the care of the organisers.

Signed: _____
(Guardian)

Name (block letters): _____
(Guardian)

Relationship to Child/Young Person: _____

Signed: _____
(Child/Young Person)

1.4B Guidance on Dealing with Accidents

It is essential that all personnel of the Sisters of Mercy (religious, employees or lay volunteers) are familiar with the procedures outlined below. If a Child has an accident and injures himself/herself while attending an event run by the Sisters of Mercy, these procedures should be followed:

1. Assess the injury and reassure the Child. If the injury is severe or the Child has lost consciousness, please contact the emergency services immediately by phoning 999 or 112. You can phone 112 from a mobile that has no credit and even from a phone that has no SIM card. The 112 emergency number is a European emergency number and can be called from anywhere in Europe. If the emergency services are to be called, contact with the Child's parents/guardians must be made urgently. Contact information should be found on the Child's membership/consent form. If the parents/guardians are not available, it may be necessary for a leader to travel with the Child to the hospital. If medical treatment is required, Sisters of Mercy personnel may be asked about known allergies or existing medical conditions. Again, this information should be found on the Child's membership/consent form;
2. If the injury is minor, local application of treatment should be available from the first aid box. There should be a fully stocked first aid box to hand at all Sisters of Mercy-related events. Remember to make a note of what has been used from the first aid box so that it can be replaced at the earliest opportunity. Under no circumstances should any medication be given to a Child;
3. As soon as possible after the accident, write up a report using an accident/incident report form (see following page). Once completed, this form should be stored in a safe place, in line with data protection, and treated as a confidential document;
4. Always inform parents/guardians of any accident that has occurred involving their Child, regardless of how minor you consider it to be. It is good practice to give a copy of the accident/incident report form to parents/guardians;
5. It is good practice to keep blank copies of the accident/incident form with the first aid box so that one can be easily filled out in the event of an emergency.

1.4B Template 1: Form for Dealing with Accidents/Incidents

Group Details

Name of Group: _____

Name of Group Leader: _____

Names of Others Present: _____

Accident Details

Date and Time of Accident/Incident: _____

Name of Person Involved: _____

Date of Birth of Person Involved: _____

Emergency Contact Details for the Person Involved (usually Parent/Guardian)

Name: _____

Telephone Number: _____

Please describe the Accident/Incident that Occurred (continue on separate sheet if necessary).

Action taken During and Following the Accident/Incident.

People Contacted (include dates and times) _____

If medical attention was required, please note the name and address of the medical facility and the people who treated the person involved in the accident/incident.

Please Detail any Follow-up Action Required.

Name of Person completing this Form (Print Name): _____

Signed: _____ Date: _____

1.4C Guidance on Maintaining Adequate Supervision Ratios

In planning a trip or activity, it is critically important to consider how many adults are needed to supervise Children in a safe manner. It is recommended that a certain number of adults be available to supervise a certain number of Children; however, this is also dependent on whether the Children have specific needs or requirements, and on the duration of the activity.

At a Minimum, Two Adults are Required for Each Activity

In addition, the minimum following ratios should be applied, depending on the number of Children:

- ✧ Zero to One years = one member of staff to three Children
- ✧ One to Two years = one member of staff to five Children
- ✧ Two to Three years = one member of staff to six Children
- ✧ Three to Six years = one member of staff to eight Children
- ✧ Seven to Twelve years = one member of staff to eight Children
- ✧ Thirteen to Eighteen years = one member of staff to ten Children

If it is an overnight activity, additional staff should be considered. If the group is mixed, a gender balance should be maintained.

1.4D Guidance on One-to-One Contact with Children and Young People

In general, activities carried out by the Sisters of Mercy should not involve one-to-one contact, and should usually be supervised by at least two adults (Guidance 1.4C). However, there may be two circumstances where this may occur:

1. In a reactive situation, for example, when a young person requests a one-to-one meeting with you without warning, or where a young person has had to be removed from a group as part of a Code of Behaviour (Guidance 1.3A);
2. As part of a planned and structured piece of work (for example, one-to-one music tuition).

The points below provide some guidance in relation to these situations.

Reactive Situations

- If you need to talk to a young person alone, try to do so in an open environment, in view of others.
- If this is not possible, try to meet in rooms with visual access, or with the door open, or in a room/area where other people are nearby. You should advise another adult that such a meeting is taking place and the reason for it. A record should be kept of these meetings – including names, dates, times, location, reason for the meeting and outcome – and stored appropriately and securely (Appendix B).
- Avoid meetings with individual Children where they are on their own in a building.
- One-to-one meetings should take place at an appropriate time, e.g. not late at night, and in an appropriate venue.

Planned and Structured Pieces of Work

- The particular activity should have a clear rationale and aims for involving one-to-one work.
- Parents/guardians must be fully informed as to the nature and purpose of this work, and must give written consent (Guidance 1.4A Template 3).
- A clear Code of Behaviour must be agreed and adhered to by both parties. This should include limits of confidentiality and safeguarding procedures (Guidance 1.3A)

1.4F Guidance on the Participation of Children with Specific Needs

Some Children have specific needs⁸ that place additional responsibilities on those who care for and work with them. It is often the situational and environmental factors that disable the Child, rather than the physical or intellectual difficulty the Child experiences. Where possible, the environmental factors should be adapted to the Child's needs. Prohibitive attitudes need to be addressed through education and information.

Children who have a disability have the same rights as any other Child, in line with the UN Convention on the Rights of the Child.

Points to Consider When Including a Child with Specific Needs in Your Group:

- ✧ Work in partnership with the Child, parents/guardians and any professionals involved to establish how the Child can be included;
- ✧ Make sure inclusion is possible before bringing the Child into the group;
- ✧ Make reasonable adjustments;
- ✧ Be interested in the Child and build a rapport with them;
- ✧ If the Child has a communication impairment, acquiring some key skills in their communication method will be useful;
- ✧ Some specific training may be useful or required, e.g. the autistic spectrum, epilepsy and others;
- ✧ Risk assessments may be necessary to ensure the safety of some Children with specific needs;
- ✧ Higher staff ratios may be required if the Child has additional needs or behavioural problems;
- ✧ Intimate care issues: when introducing a Child with specific needs into an activity, it is important to establish if they have intimate care needs, and who should provide or assist with this if it is necessary. It is important to remember that not every Child with a disability has intimate care needs. Intimate care is, to some extent, individually defined and varies according to personal experience, cultural expectations and gender. It may be described as help with anything of a personal or private nature that the individual is unable to do themselves;
- ✧ Children with specific needs may be more likely than other Children to be bullied or subjected to other forms of abuse, and they may also be less clear about physical and emotional boundaries;
- ✧ It is particularly important that Children with specific needs are carefully listened to, in recognition of the fact that they may have difficulty expressing their concerns, and so that the importance of what they say is not underestimated.

⁸ Specific needs mean the specific, or unique, out-of-the-ordinary concerns created by a person's medical, physical, mental or developmental condition or disability. Additional services are usually needed to help a person in one or more of the following areas: thinking, communication, movement, getting along with others, and personal care.

Generally, personnel of the Sisters of Mercy are not expected to be involved in the provision of intimate care of Children. This should be undertaken by suitably qualified people. Decisions regarding who provides intimate care for a Child should be discussed and agreed by everyone concerned: the Child's views should be ascertained; parents/guardians should be consulted and their consent sought; a rota of carers of the same sex as the Child should be agreed; and the age, stage of development and ethnicity of the Child will need to be considered. Most importantly, it should be agreed in advance who will carry out intimate care and how it should be done. Guidelines to be borne in mind when providing intimate care include: the sensitive nature of such tasks; the need to treat every Child with dignity and respect; the need to ensure an appropriate degree of privacy; the need to involve the Child as much as possible in their own care; and trying to ensure consistency in who provides care.

If a Child appears distressed or unhappy, this should be discussed with parents/guardians, if appropriate, and the activity leader. Any concerns or allegations should be reported following the procedures outlined in the safeguarding policy and procedures adopted by the Congregation of the Sisters of Mercy.

1.4G Guidance on Trips Away with Young people

Trips away that involve Young people can be an extremely rewarding and fulfilling experience for adults and Children/Young people involved in them. However, to do this safely and in a way that safeguards all concerned requires careful planning and consideration. Listed below are a number of areas that should be considered in planning a trip away.

Considerations for Planning Trips Away

Have you:

- Identified the aim and outcomes of the programme?
- Followed the Congregation of the Sisters of Mercy's Child Safeguarding Policy and Procedures?
- Carried out a hazard assessment (Guidance 1.8A)?
- Recruited and selected staff/volunteers using safe practice procedures (Guidance 1.1A)?
- Selected a key staff member who has overall responsibility for the trip?
- Selected staff for the trip who are appropriately trained, qualified and vetted (if appropriate) (Guidance 1.1B)?
- Nominated a staff member who is responsible for first aid (Guidance 1.4B)?
- Ensured that you have adequate and gender-based supervision in line with the safeguarding policies and procedures of the Congregation of the Sisters of Mercy (Guidance 1.4C)?
- Appointed a contact person at home who has access to all information and contact details?
- Checked your own insurance and ensured that you have coverage for all activities?
- Checked that the transport has appropriate insurance, qualified drivers and seatbelts?
- Carried out an equipment safety check?
- Checked the first aid kit?
- Ensured there is a contingency plan?
- Made provisions for returning home early?
- Allocated a budget and contingency fund?
- Checked out the locations and accommodation of the trip away to ensure they have:
 - Appropriate safeguarding policy, practices and procedures in place?
 - Insurance cover?
 - Appropriately trained and qualified staff?
 - Changing areas for boys and girls (if required)?
 - Disability access (if required)?

Have the Young People/Participants:

- Been involved as much as possible in the planning of the trip?
- Agreed a Code of Behaviour (Guidance 1.3A)?
- Agreed boundaries around unstructured time?
- Been given information on appropriate clothing, and contact details for leaders?
- Consented to the trip away (Guidance 1.4A Template 3)?

Have Parents/Carers:

- Met with leaders and been informed of the programme?
- Been given a copy of the Congregation of the Sisters of Mercy's Child safeguarding policy and procedures?
- Consented in writing (Guidance 1.4A Template 3)?
- Given contact details, medical details including allergies, illnesses, medications and dietary requirements (Guidance 1.4A Template 3)?
- Been given contact details of the leaders and centre?
- Been given details for pick up and drop off of Young people/participants?

Have Staff:

- Been trained on the Congregation of the Sisters of Mercy's Code of Behaviour and Child safeguarding policy, on how to deal with a disclosure, and on dealing with challenging behaviour (Guidance 1.2A, Guidance 2.1C, Guidance 1.3B)?
- Been assigned responsibilities and scheduled for breaks?
- Been made aware of how to handle an emergency, and who to contact in an emergency (Guidance 2.1A)?
- Worked with Young people to evaluate the success of the activity?

If Staying Overnight, Have you Checked:

- If there is 24/7 access to centre staff?
- If there are appropriate sleeping arrangements for Young people, i.e. separate provision for boys and girls, and separate provision for leaders (within ear shot of Young people)?
- The centre's supervision and security?

1.5A Guidance on External Groups who Use Church Property

It is a requirement that all groups working with Children through the Sisters of Mercy and/or using facilities owned by the Sisters of Mercy are insured, and that they have a Child safeguarding policy in place.

The general principle is that the obligation to comply with requirements relating to insurance and Child safeguarding rests with the group using the property of the Sisters of Mercy, and not with the Congregation.

1. It is the responsibility of any group using property of the Sisters of Mercy to run activities involving Children to ensure that they comply with all applicable Child safeguarding and protection legislation and guidelines.
2. The group should have their own Child safeguarding policy and procedures. The group is also responsible for liaising with Tusla/HSCT (Health and Social Care Trust) (as appropriate), to ensure that the policy and procedures meet the statutory requirements.
3. The group should have appropriate insurance for the activity they are running.
4. The Congregation of the Sisters of Mercy will at no stage assist any outside group in developing a Child safeguarding policy.
5. The Congregation of the Sisters of Mercy require confirmation in writing from the group that they have a Child safeguarding policy in place. It is not the role of the Sisters of Mercy to validate the adequacy of the policy; that is the responsibility of Tusla/HSCT.
6. The Congregation of the Sisters of Mercy require confirmation in writing from the group that they have appropriate insurance in place, which includes the following:
 - The name of their insurers;
 - The policy number;
 - The period of cover of the policy;
 - The limit of indemnity.

External Organisations that offer Advice and Support Regarding Child Safeguarding Policies

The following organisations may prove helpful in providing training and assisting external groups to create their own safeguarding policy.

Republic of Ireland

- Tusla Information and Advice Officers
<http://www.tusla.ie/Children-first/roles-and-responsibilities/organisations/Children-first-training>
- Barnardos
<http://www.barnardos.ie/what-we-do/training/training-and-consultancy.html>
- National Youth Council of Ireland
<http://www.nycitraining.org>
- Dublin Rape Crisis Centre
<http://www.drcc.ie/training-and-development/>

Northern Ireland

- Children in Northern Ireland
<http://www.ci-ni.org.uk/training-schedule>
- Youth Action Northern Ireland
<http://www.youthaction.org/dynamic/programmemain.aspx?Author=TR&prog=101&ParCat=22&pid=5>
- NSPCC
<http://www.nspcc.org.uk/what-you-can-do/get-expert-training/introduction-Child-protection-training/>

1.5A Template 1: Form for Use of Church Property by External Groups

As Sisters of Mercy, we welcome other organisations/groups/ individuals within the community using our facilities. While using the facilities of the Sisters of Mercy, we want to be assured that all reasonable steps have been taken to safeguard Children⁹ and Young people. The responsibility for complying with good safeguarding practice (including safe recruitment and vetting) rests with the group using the Sisters of Mercy property and not with the Congregation of the Sisters of Mercy.

The Congregation of the Sisters of Mercy has its own policies and procedures in relation to safeguarding Children. Any group operating under the name/auspice of the Congregation of the Sisters of Mercy will comply with these requirements.

As an outside body, the Sisters of Mercy requires detailed information in respect of your application to ensure that the safety and well-being of the Children, Young people and adults that work with them are maintained at all times.

Conditions of use of the Sisters of Mercy's property by outside bodies:

1. It is the responsibility of any group using the Sisters of Mercy's property to run activities involving Children to ensure that they comply with all applicable Child safeguarding and protection legislation and guidelines.
2. The group should have their own Child safeguarding policy and procedures. The group is also responsible for liaising with Tusla/HSCT to ensure that the policy and procedures meet the statutory requirements. The Sisters of Mercy cannot assist any outside group in developing a Child safeguarding policy.
3. The Sisters of Mercy require confirmation in writing from the group that they have a Child safeguarding policy and appropriate insurance.

We would ask that you complete the following questionnaire. If any response is not applicable (N/A), please provide details of why this does not apply to your organisation.

If you feel your application requires further information, please attach on an additional page. Please indicate when additional information is provided in support of your application.

⁹The term 'Child' refers to a Person under the Age of Eighteen Years.

The Congregation of the Sisters of Mercy

Name of Group/Organisation _____

Purpose or Proposed Activities _____

User Group, e.g. Children, Adults _____

Facilities Required _____

Date of Commencement of Use _____

Date of Completion of Use _____

Frequency of Use _____

Hours of Use:

1) Commence at _____ (a.m./p.m.)

2) Finish at _____ (a.m./p.m.)

Names and Addresses of Persons who will be in Charge During Use:

(1) _____ Telephone Number _____

(2) _____ Telephone Number _____

Do you have your own Child safeguarding policy and procedures? Yes No

Do you have appropriate (public liability and/or employer’s liability and professional indemnity if appropriate) insurance cover for the activity? Yes No

Name of Insurance Company _____

Policy Number _____

Period of Cover _____

Limit of Indemnity _____

To be Signed by Official/Coordinator of the Organisation/Group

Signed: _____

Print Name: _____

Position: _____

Date: _____

1.5B Guidance on Church Property and Hire for Private Functions

Individual adults (parents/guardians/family members) approaching the Sisters of Mercy to use their property for a private function do not meet the requirement for vetting by the Congregation of the Sisters of Mercy.

The Sisters of Mercy are insured to cover one-off private events, and it is the sole responsibility of the parents/guardians to organise and supervise all Children attending. As such, they are not required to confirm in writing that they have a safeguarding policy or appropriate insurance.

However, as a matter of good practice, each local Leader should ensure that key health and safety measures are covered prior to agreeing the property for use. For example, it would be good practice to draw up an agreement with a potential user (e.g. in the case of a Child's private birthday party), highlighting the terms and conditions for the use of the Sisters of Mercy's property, which should include:

- That the Sisters of Mercy will ensure the property is safe to use, including how accidents resulting from the condition of the property should be reported;
- That the Sisters of Mercy are not responsible for the organisation, supervision or conduct of the Children or adults involved in the event;
- That the safeguarding policy of the Congregation of the Sisters of Mercy does not apply to the private party, and, as such, all safeguards are the responsibility of the organiser of the event and not the Congregation of the Sisters of Mercy.

What is Excluded as Part of this Guidance

This guidance is specifically for events that involve Children, and is not designed for non-Child-related events. Additionally, this guidance does not cover the following situations:

- Ministry with Children that is organised by the Sisters of Mercy as part of sacramental celebrations (for example a Communion/Confirmation celebration involving a number of Children). In these situations, the responsibility for safeguarding rests with the Sisters of Mercy;
- Use of the property of the Sisters of Mercy for other parish-related or community-related activities such as funeral receptions and other such activities, which fall outside the remit of safeguarding Children;
- Schools using the property of the Sisters of Mercy for sacramental celebrations. In these situations it is advisable that the school and the Sisters of Mercy agree who is responsible for safeguarding using Guidance 2.1J.

1.5C Guidance for Religious whose Church is Used for Public Masses

Where the Sisters of Mercy facilitates Mass on its property, which may be attended by members of the public, including Children, the following safeguards are required:

- The Sisters of Mercy will ensure that the visiting Priest shows his celebret/letter of good standing, and a record is kept to this effect (Guidance 1.1C);
- The Priest agrees to follow his own Diocesan/Religious order's Child Safeguarding Procedures.

1.5D Guidance on Religious who Facilitate Groups of Children on Church Property

The Sisters of Mercy, may open their property for example to groups of Children as part of their faith development. Responsibility for the Children rests with the organisers of the visit (the school, those involved with sacramental preparation, etc.).

If a member of the Sisters of Mercy **is directly involved with the Children, this is classed as ministry with Children**, and the applicable indicators in Table 1 of the policy apply.

If a member of the Sisters of Mercy **is not directly involved with the Children, this is not classed as ministry with Children**. In this situation, as part of Indicator 1.5, the following safeguards must be in place:

- The adult leader organising the visit is advised that the safeguarding procedures of the Church body/school to which they belong apply during the period of the visit;
- The organiser is asked to complete a form for use of Sisters of Mercy property by external groups (Guidance 1.5A Template 1), and this is retained by the Sisters of Mercy as part of record-keeping requirements (Appendix B).

1.6A Guidance on Whistle-Blowing

All Sisters, staff and volunteers within the context and agency of the Congregation of the Sisters of Mercy must acknowledge their individual responsibility to bring matters of concern to the attention of their supervisor/ local Leader/manager.

This could be the local Leader, Designated Liaison Person, (D.L.P). Provincial Leader and/or relevant line managers. Although this can be difficult to do, it is particularly important where the welfare of Children may be at risk.

You may be the first to recognise that something is wrong, but you may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues, or you may fear harassment or victimisation. These feelings, however natural, **must never result in a Child or young person continuing to be unnecessarily at risk**. Remember, it is often the most vulnerable Children or Young people who are targeted. These Children need an advocate to safeguard their welfare.

Don't think, 'what if I'm wrong?' Think, 'what if I'm right!'

Reasons for Whistle-Blowing

- Each individual has a responsibility to raise concerns about unacceptable practice or behaviour.
- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent yourself from becoming implicated.

What Stops People From Whistle-Blowing

- Fear of starting a chain of events that spirals out of control.
- Disrupting the work or project.
- Fear of getting it wrong.
- Fear of repercussions or damaging careers.
- Fear of not being believed.

How to Raise a Concern

Whistle-blowing can be about a range of concerns, not just safeguarding.

It is important to:

- Voice any concerns, suspicions or uneasiness as soon as possible. The earlier a concern is expressed the sooner and easier action can be taken;
- Try to pinpoint exactly what practice is concerning and why;
- Approach your immediate local Leader/supervisor/manager;
- If your concern is about your immediate local Leader/supervisor/manager, please contact your DLP, the statutory services or the NBSCCCI;
- Make sure a satisfactory response is secured – don't let matters rest;
- Ideally, concerns should be placed in writing, outlining the background and history, giving names, dates, locations and any other relevant information;
- You are not expected to prove the truth of your complaint, but you need to demonstrate sufficient grounds for concern.

What Happens Next?

- You should be given information on the nature and progress of any enquiries resulting from your concern.
- Your Supervisor/Local Leader/Manager has a responsibility to protect you from harassment or victimisation.
- No action will be taken against you if the concern proves to be unfounded and was raised in good faith.
- Malicious allegations will be considered a disciplinary offence.
- Follow up if the person to whom you reported has not responded within a reasonable period of time, and if that follow up is not acted upon, report the matter to the relevant statutory authorities.

Self-Reporting

There may be occasions when a Sister, member of staff or a volunteer has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Sisters, Staff and volunteers have a responsibility to discuss such a situation with their line Supervisor/Local Leader/Manager so that professional and personal support can be offered to the member concerned.

Whilst reporting will remain confidential, in most instances this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of Children.

1.7A Guidance on Complaints Procedure for Safeguarding Concerns that are not Allegations of Abuse

Introduction

A complaint is defined as a grievance and/or the raising of a concern about breaches of codes of behaviour. Allegations or suspicions of Child abuse do not fall into this category of general complaints, and should always be dealt with in accordance with Guidance 2.1H. This complaints procedure is not for use by personnel of the Sisters of Mercy who would use the whistle-blowing procedure to raise their complaint (Guidance 1.6A).

All complaints will be taken seriously and dealt with fairly and confidentially. Efforts will be made to quickly and informally resolve complaints through discussion with the parents/guardians, Children/Young people, volunteers/members of staff and Sisters, as appropriate.

Parents/guardians, Young people/Children, volunteers, members of staff and Sisters will be made aware that there is a complaints procedure. A copy of the complaints form is available in Guidance 1.7A Template 1.

If a parent/guardian, young person or Child is not satisfied with any aspect of the running of a particular activity, or the behaviour of any individual involved in that activity, the following steps should be taken:

First Step

All complaints of this nature should be resolved using an open dialogue with the personnel of the Sisters of Mercy involved. If resolution is not possible, the following step should be taken.

Second Step

1. The Provincial Leader or her delegate should be contacted by completing a complaints form (Guidance 1.7A Template 1). The Provincial Leader/delegate has eight weeks to consider the complaint.
2. A letter acknowledging receipt of the complaint should be sent within seven calendar days, enclosing a copy of the complaints procedure.
3. All complaints must be thoroughly investigated.
4. The Provincial Leader or her delegate may organise a meeting to discuss and hopefully resolve the complaint. This communication may also take place by telephone if a meeting is not possible. They will do this within fourteen calendar days of sending the acknowledgement letter to the complainant.
5. Within seven days of the meeting or discussion, the Provincial Leader or her delegate will write to the complainant to confirm what took place and to set out any solutions that were agreed upon.

6. If a meeting is not agreeable or possible, the Provincial Leader or her delegate will issue a detailed written reply to the complainant, setting out their suggestions for resolving the matter within twenty- one calendar days of sending the acknowledgement letter to them.
7. If the complainant is still not satisfied at this point, they should contact the Provincial Leader again.

At the conclusion of this step, the Provincial Leader may decide to take further action on the complaint. If, however, the Church authority decides not to take further action, the process is completed.

1.7A Template 1: Complaints Form

All complaints arising during an activity related to the Sisters of Mercy activity (with the exception of complaints about Child abuse) should attempt to be resolved by discussion between the parties involved. If this is not possible, this form should be completed and sent to the Provincial Leader.

Name _____

Address _____

Email _____ Telephone Number _____

Details of Complaint (continue on separate sheet if necessary).

Signature _____

Date _____

1.8A Guidance on Hazard Assessment of Activities with Children

Introduction

Hazard assessment is an important part of working with Children. It assists with managing both health and safety issues, and the welfare of Children.

As adults we assess hazards throughout our lives, but when working with Children it is important to consider potential hazards that may lead to risk to Children and to the adults who work with them. Consideration of how to control or manage hazard is critical. It is important to identify acceptable levels of hazards, as all risk cannot be removed.

Whilst this guidance is concerned primarily with hazards associated with failure to follow effective safeguarding practice, it must be understood alongside the health and safety regulation and policy of the Congregation of the Sisters of Mercy. Whilst the focus on hazard assessment should be on groups of Children with whom you are working, as opposed to the physical venue, if a problem with the venue is discovered during the course of assessing (e.g. broken glass, electrical cabling, etc.) this needs to be raised with the appropriate authority in charge of health and safety for the Sisters of Mercy.

What Does the Term 'Hazard' Mean?

A hazard is a potential source of harm or adverse health effect on a person or persons. This may include areas such as:

- Failure to comply with effective safeguarding practice, such as lack of supervision ratios or consent forms;
- Medical hazards, such as failure to take medication, or inappropriate intimate care practice;
- Physical hazards, such as dangerous electrical cabling, or proximity to water.

Assessing Hazards

1. Identify the hazards: look for hazards in the nature of the activity, and in the place where you are holding the activity.
2. Identify who is at risk: decide who may be harmed and how. Everyone, or perhaps only certain people, may be at risk. Some groups may need special consideration as they may be more vulnerable to certain hazards.
3. Identify what the likelihood of harm may be.
4. Identify the consequences of injury or harm: the consequences could range from trivial to severe or even fatal. The most severe hazards need the most urgent attention.
5. Identify the controls that need to be put in place to limit the hazard.

These steps should be used to complete a hazard assessment form (Guidance 1.8A Template 1). If no hazard exists, you don't need to note it on the form.

Reviews

Risk should be periodically reviewed, especially in circumstances when a venue changes, a new activity takes place or the members of the group change.

1.8A Template 1: Hazard Assessment Form

Name of Group _____

Date of Hazard Assessment _____

Person Completing the Hazard Assessment _____

Hazard	Who is at risk?	Likelihood of harm	Consequences	Controls needed

Signed _____

Date _____

1.9A Guidance on Use of Technology

The Congregation of the Sisters of Mercy assess the benefits of technology and how this can be used safely and effectively, in line with rules that respect the dignity and rights of all users, particularly Children.

Detailed policies and procedures should be provided on the use of technology, including digital and online systems such as:

- The Internet (Guidance 1.9B);
- Texting and Emailing (Guidance 1.9C);
- Photography (Guidance 1.9D);
- CCTV and webcams (Guidance 1.9E).

The majority of occasions when people use mobile phones, computers or take photographs of Children do not provide any cause for concern. However, there are occasions when this is not the case.

At the outset it is important to identify the risks associated with the use of technology, and then to minimise the risks by putting in place measures outlined below.

Consent

The consent of Parents/Guardians and Children should always be sought prior to engaging in any activity that involves the use of IT equipment, such as those outlined above.

The Congregation of the Sisters of Mercy may seek overall consent from its members/ leaders (1.4A Template 3), or may ask for permission for set occasions (1.9A Template 1).

When seeking consent for the use of images or videos for purposes of the Sisters of Mercy, the following should be considered:

- The issue of consent for photography/videoing for the Sisters of Mercy purposes should be addressed with parents/guardians and Children prior to the sacramental day, and the policy should be explained to all families who will be attending;
- In seeking consent for photography/videos, Children and families should be reminded about the rights to privacy and data protection of other Children, their families and the wider community;
- Those organising an event for the Sisters of Mercy purposes, and who are seeking consent for photography/video usage, should be sensitive to the fact that many parents/guardians are reluctant to allow the general viewing of their Children, or of Children in their care, on sites such as YouTube, Facebook, etc.

Purpose

Guidelines should be clear as to the reason and purpose of the use of the particular form of technology:

- Provide a clear brief about what is considered appropriate in terms of content and behaviour and use of equipment;
- Provide guidance on acceptable language;
- Provide guidance on storage of information;
- Provide guidance on use of photography: if using an external photographer/videographer, seek confirmation about any publications that will be made by them after the event, and ensure that they have been vetted, have identification and do not have any unsupervised access to Children or one-to-one photo sessions at events;
- Images of Children should never be taken that capture them in what are commonly understood as 'non-public' activities. Children should be fully and appropriately dressed and related images should always be about the activity and not focused on any individual Child;
- Images should not allow the identification of a Child or their whereabouts. The full name of a Child should not be used;
- Children in vulnerable circumstances (e.g. those in care or victims of any type of abuse) should not be photographed without the consent of those who hold parental responsibility;
- Provide guidance on the use of mobile phones, and especially on the use of mobile phone cameras, which can be easily used for offensive actions without the subject being aware of their use;
- Provide guidance on how to communicate this policy with parents/guardians and Young people.

1.9A Template 1: Media Permission Form

Data Protection

This form will be held on file in accordance with the data protection policy of the Congregation of the Sisters of Mercy. The data entered will be used only for the purpose indicated on this form. It may only be accessed by those who have responsibility for managing files or activities.

Child's/Young Person's Consent

I _____ (Insert First Name and Surname) would like to take part in _____ (Name of Event) on _____ (date of event).

(If relevant please tick the boxes below)

- I understand that photographs may be taken during the event, and I give my permission for these to be used in any hard copy/online (delete as appropriate) publications by the Sisters of Mercy.
- I understand that videos may be taken during the event, and I give my permission for these to be used in any hard copy/online (delete as appropriate) publications by the Congregation of the Sisters of Mercy.
- I understand that updates may be posted on the Congregational/Provincial website and/or social network sites during the event, and I give my permission for my images/videos of me (delete as appropriate) to be used.

Guardian's Consent

I agree to allow the above-named Child/Young Person to attend this event during the period _____ (insert start date and time) to _____ (insert end date and time),

in accordance with the permission granted by _____
(insert name of Child/Young Person).

Signed: _____
(Guardian)

Name (block letters): _____
(Guardian)

Relationship to Child/Young Person: _____

Signed: _____
(Child/Young Person)

1.9B Guidance on Use of the Internet

It is recognised that the internet is valuable and widely used. Within the Congregational context, clear guidelines have been developed and inserted into the Code of Behaviour for each Church activity involving Children (Guidance 1.3A).

The following are deemed unacceptable behaviours, and must be avoided in every situation:

- Visiting internet sites that contain offensive, obscene, pornographic or illegal material;
- Using a computer to perpetrate any form of fraud or piracy;
- Using the internet or email systems to send offensive and harassing material to others;
- Using obscene or racist language in computer-assisted communications;
- Publishing defamatory or otherwise false material generated by oneself or by others through social networking;
- Introducing any form of malicious software into the used network;
- Intentionally damaging any information communication technology equipment;
- Using another user's password, or giving that password to a third party.

It is important that the following are made clear to all who use the internet:

- All Sisters of Mercy personnel/volunteers/group leaders must be made aware of their responsibility, and sign up to appropriate use of the internet as part of a Code of Behaviour (Guidance 1.3A);
- Responsibility is about safeguarding Children, taking care of oneself, one's co-workers and group leaders;
- Anyone using a shared computer requires their own individual password;
- Training in appropriate and responsible internet and computer use is imperative in order to follow best practice in all activities that concern Children, co-workers and volunteers.

1.9C Guidance on Use of Texting and Email

Texting and email are very quick and effective methods of communication for those involved in Mercy Congregational activities, usually this does not include Mercy personnel contacting young people directly, as contact is usually made via their parents/guardians. However there are certain circumstances where contacting young people directly may be necessary (i.e in an emergency or on a trip away), any personnel of the Sisters of Mercy using this method of communication with young people should ensure appropriate safeguards are in place as there are certain risks associated with their safe and appropriate use of texting and email, which must be managed.

The risks of text and email messaging for Children and Young people are:

- Inappropriate access to, use of, or sharing of personal details (names, numbers, email addresses);
- Unwanted contact with Children/Young people by adults with bad intent, text bullying by peers etc.;
- Being sent offensive or otherwise inappropriate materials;
- Grooming for sexual abuse;
- Direct contact and actual abuse.

The Risks for Adults Include:

- Misinterpretation of their communication with Young people;
- Potential investigation (internal or by statutory agencies);
- Potential disciplinary action.

Using Bulk (or bundled) Text and Email Messaging

A way to minimise the risks above is to use bulk text messages. This is where the same text or email message is sent to several Young people involved with a particular activity or group. The advantage of this approach is that it presents fewer opportunities for misuse and abuse than personal, one-to-one texting or emailing arrangements between staff or volunteers and Children/ Young people. Therefore, one-to-one texting or emailing should be strongly discouraged and should only occur in exceptional circumstances. The same applies to emailing Young people.

The Following Guidance is Provided to Minimise Risk to All:

1. Consent must be obtained from young people and their parents/guardians prior to sending Young people text or email messages. Parents/ guardians should be offered the option to be copied on texts and emails that their Child will be sent.
2. The Young people's mobile phone numbers or email addresses should be stored safely and securely (Appendix B), with access only available to the specific identified personnel of the Sisters of Mercy. The numbers or details should not be shared with anyone else, and should only be used for the purposes of the text and email messaging system regarding the Congregational activity;
3. All text and email messages must be sent via a bundle to a group of Young people, i.e. the same standard text message is sent to every member of the group. The text and email messaging system should never be used to send text or email messages on an individual basis (i.e. to just one person);
4. All text and email messages sent must make it clear to the Young people receiving them who has sent the message;
5. Young people should not be given the opportunity to text or email back to the system. It should only be used as a one-way communication channel;
6. The text and email messages that are sent must never contain any offensive, abusive or inappropriate language;
7. When this guidance is being provided in relation to Congregational-related activities, all of the text or email messages sent must be directly related to Congregational activities. The text or email messaging system and mobile phone numbers must never be used for any other reason or in any other way;
8. All of the text and email messages sent should include a sentence at the bottom that provides Young people with the opportunity to unsubscribe from receiving further text and email messages.

1.9D Guidance on Use of Photography

The use of photos on websites and in other online/hard copy publications can pose direct and indirect risks to Children and Young people. Sisters of Mercy wishing to use images of the Children they work with, or are otherwise in contact with, should consider these guidelines.

The Sisters of Mercy only has responsibility for safeguarding and the use of photography if it plans to use the photographs for Congregational purposes. Photographs taken at events organised by family and schools such as Communions, weddings or Confirmations do not fall under the responsibility of the Sisters of Mercy, unless they are being taken for Congregational purposes.

Risks to Children

Even if the Child's personal identity (full name, address) is kept confidential, other details accompanying the photo can make them identifiable and therefore vulnerable to individuals looking to groom Children for abuse. There is also a risk that the photo itself will be used inappropriately by others. Photos can easily be copied and adapted, perhaps to create images of Child abuse, which can then find their way on to other websites.

How to Minimise Risks

- Establish the type of images that appropriately represent the activity and think carefully about any images showing Children and Young people on the Congregational / Provincial website or publication;
- Never supply the full name(s) of the Child or Children along with the image(s);
- Only use images of Children in suitable dress and focused on the activity, rather than one particular Child;
- Obtain permission: the permission of parents/guardians and Children should always be sought when using an image of a young person. Parents/guardians should be aware of the policy of the Congregation of the Sisters of Mercy on using Children's images and of the way these represent the Sisters of Mercy or the activity. This must be recorded on a joint consent form for use of images of Children. The Child's permission to use their image must also be recorded if they are under eighteen years of age. This ensures that they are aware of the way the image is to be used to represent the activity (1.9A Template 1).

Using Photographers

The Sisters of Mercy often employs photographers for certain school or Church activities.

When Using a Photographer, it is Important to Do The Following:

- Provide a clear brief about what is considered appropriate in terms of content and behaviour;
- Ascertain if the photographer requires vetting and, if they do, put them through the process;
- Provide the photographer with a form of identification that must be worn at all times;
- Do not allow unsupervised access to Children or one-to-one photo sessions at events;
- Do not allow photo sessions to take place away from the event, for instance, at a young person's home;
- Inform parents/guardians and Children that a photographer will be in attendance, and ensure that they consent to both the taking and publication of photos or films;
- Seek confirmation on the extent of any publications that will be made by the photographer after the event.

If parents/guardians are intending to photograph or video at an organised event, they should also be made aware of what is permitted and what is not.

Responding to Concerns

Children and parents/guardians should be informed that if they have any concerns regarding inappropriate or intrusive photography, these should be reported to the Provincial Leader to ensure that any reported concerns are dealt with in the same way as any other Child protection or Child safeguarding issue.

1.9E Guidance on Use of CCTV and Webcams

The increasing use of CCTV and the internet has wide implications, and unless such systems are used with proper care and consideration they can give rise to concern that the individual's 'private space' is being unreasonably invaded or eroded. The Congregation of the Sisters of Mercy must have an appropriate data protection policy in place that covers the use of webcam and CCTV images.

Section 2 (1) c (iii) of the Data Protection Act requires that data are 'adequate, relevant and not excessive' and fit for purpose for which they are collected.

If a data controller is satisfied that it can justify the installation of a CCTV system, it must carefully consider what it will be used for and if these uses are deemed reasonable in the circumstances.

Security of premises or other property is probably the most common use of a CCTV system and, as such, will typically be intended to capture images of intruders, or of individuals damaging property or removing goods without permission.

Using a CCTV to constantly monitor employees is highly intrusive and would need to be justified by reference to special circumstances. The retail sector is one example where there is evidence to suggest that money or goods could be removed without authorisation.

The location of CCTV is a key consideration, and its use within areas where individuals would have a reasonable expectation of privacy, e.g. toilets and changing rooms, would be difficult to justify.

Cameras placed so as to record external areas should be positioned in such a way as to prevent or minimise recording of passers-by, or of another person's private property.

Having acknowledged the positive and sometimes negative aspect of CCTV, The Congregation of the Sisters of Mercy should draw up a policy and guidelines in order to maximise the benefit of such installations and minimise the possibility of a person's privacy being infringed.

The Following Should be Considered:

- If CCTV cameras are in place, it is important to have very obvious signs informing Sisters of Mercy personnel, volunteers and the public that this is the case;
- All uses of CCTV must be appropriate and fit for a specific purpose. As CCTV infringes the privacy of persons captured in the images, there must be a genuine reason for installing such a system;
- If installing such a system, the purpose for doing so must be displayed in a prominent place and preferably behind a locked noticeboard where it will not be damaged or removed. An obvious place would be within the porch or at entrances;
- Images captured should be retained for a maximum of twenty-eight days (see Section 2 [1] c [iv] of the Data Protection Act). An exception for a longer duration would be where images need to be retained specifically in the context of an investigation;
- Tapes should be stored in a secure environment, along with a log of access to tapes. Access should be restricted to authorised personnel. Similar measures should be in place when using disc storage, with the creation of automatic logs of access to the images.

Web broadcasting

There are a number of data protection issues that must be met in relation to broadcasting on the internet. The policy should be reflective of these:

- Recording people via a web camera, and the subsequent displaying of such images over the internet, is regarded as the processing of personal data. It is imperative that it must be done with the consent of the individual;
- Camera shots (images) should be wide shots, minimising the possibility of easily identifying individuals with close-up images;
- Signs should be placed at all entrances to Sisters of Mercy premises and in other prominent locations, informing those attending ceremonies or visiting that web cameras are in operation;
- Sisters of Mercy personnel should give written consent to their image being used for web broadcasting during the course of their regular duties. Copies of this written consent should be kept in a safe and locked place;
- If the Congregational activity being recorded involves children(for example ministers of the word, choirs etc), then their written consent and that of their parents/guardians is required;
- Service providers should be able to give regular and accurate information regarding the number of people who actually log in online to view. This information is important for future planning and assessing the value of web broadcasting;
- Ensure that the broadband package has unlimited usage for uploading, or else there is a risk of incurring significant costs from the provider;
- It is imperative that live broadcasts can be terminated to stop transmission. This should be done by accessing the control panel of the system. Someone should be delegated to break transmission if required.

1.10A Guidance on Ensuring All Sisters of Mercy who are Ministering with Children in an External Organisation/Church Body, Agree to Follow Effective Safeguarding Practice

It is important that where Sisters of Mercy are ministering with Children in an external organisation or Church body, the Provincial Leader has confirmation that the external organisation or Church body has effective safeguarding policies and procedures in place.

To do this, the Provincial leader will have written confirmation from every Sister who is ministering with Children in an external organisation or Church body. This confirmation will include:

- That the organisation for whom the Sister of Mercy is ministering has Safeguarding Policies and Procedures in place;
- That the Sister of Mercy ministering in this external organisation understands that while she is working for that organisation, she must adhere to the Safeguarding Policies and Procedures of that organisation.

