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# SAFEGUARDING CHILDREN GUIDELINES

Republic of Ireland

# **Foreword**

Concern's Safeguarding Children Guidelines (ROI) have been developed to ensure that the welfare of children will always come first. The rights of children will be protected and children will be respected at all times.

These guidelines set out in detail the expected behaviour of staff and volunteers engaged by Concern in their dealings and management of activities involving children, primarily through Concern's Global Citizenship programme in the Republic of Ireland.

# **Contents**

# **CHAPTER 1**

Introduction	6
Context	6
Purpose of Guidance Document	6
Who are these Guidelines for	6
Concern Values	7
CHAPTER 2: Concern's work with children and youth in I	reland
Concern's schools programme	9
Concern All Island Debates	9
CHAPTER 3: Safe Management Practice and Code of Beha	aviour
What is child abuse or harm?	11
Risk Assessment	11
Child Safeguarding Statement	11
What the Child Safeguarding Statement should contain	12
Managing any risk identified	12
Child Safeguarding – Policies, Procedures and Practice	12
Safe Recruitment Procedures	13
Consultants, Contractors and others	13
Garda Vetting	13
Safeguarding Training	13
Who is safeguarding training for?	13
Roles and Responsibilities	13
Reporting and Protection	14
How to report	14
Guiding principles on reporting child abuse or neglect	15
Deciding Not to Make a Report to the Authorities	15
Disciplinary, complaints, and appeals of Code of Behaviour Breaches	15
Dealing with allegations	16
Retrospective Reporting	16
Provision of support	16

Confidentiality	6
Record Keeping	7
Victimisation and Retaliation	7
Malicious Complaints	7
CHAPTER 4: Information for Children, Parents and Teachers	
Information on Concern activities	9
Parental Permission and best practice working with schools and partners	
Incidents and Accidents procedures	
CHAPTER 5: Information for Volunteer Adjudicators	
Information for volunteers	1
Appendices	
Appendices	
Appendix 1: Recruitment procedure for staff who have contact with children	3
Appendix 2: Recruitment procedures for volunteers who have contact with children in ROI 2	5
Appendix 3: Safe management practices and code of behaviour	7
Appendix 4: Safe Management Practices and Code of Behaviour regarding photography, email and video recording and use of social media	9
Appendix 5: Information for parents/guardians, teachers and students	0
Appendix 6: Incident Record Form	3
Appendix 7: Child Protection Standard Report Form	5
Appendix 8: Contact details for TUSLA and Garda Síochána	0
Appendix 9: Zoom guidelines for Employees	1
Appendix 10: Checklist for Employees Facilitating a Talk or Workshop in School/ Youth Centre Premises with teacher/ youth worker present	4
Appendix 11: Checklist for Employees Facilitating an online talk/ webinar for schools/ youth centres with teachers/ youth workers present	5
Appendix 12: Checklist for Employees Facilitating a Talk or Workshop in External Venue 4	6
Appendix 13: Checklist for Employees Facilitating Online talk or workshop with no teachers or youth workers present	9
Appendix 14: Sample Consent Form	

# **Glossary**

**Child:** For the purpose of this guidance a child is any person under 18 years of age unless they are or have been married (Child Care Act 1991).

**Designated Liaison Person (DLP):** A person who is responsible for reporting allegations or suspicions of child abuse and welfare issues to the Statutory Authorities. This person will be a resource to anyone in Concern who has a child protection/welfare concern.

**Mandated Person**: The mandated person is a person named under schedule 2 of Children First Act 2015 (ROI). They have a legal responsibility to report concerns or allegations that reach or exceed the threshold of harm of abuse to TUSLA.

**Provider of Relevant Service:** As defined in the Children First Act 2015 (ROI), this means, in relation to a relevant service, a person-

- (a) who provides a relevant service, and
- (b) who in respect of the provision of such relevant service-
  - employs (whether under contract of employment or otherwise) one or more than one other person to undertake any work or activity that constitutes a relevant Service.
  - (ii) enters into a contract for services with one or more than one other person for the provision by the person of a relevant service, or
  - (iii) permits one or more than one other person (whether or not for commercial or other consideration and whether or not as part of a course of education or training, including an internship scheme) to undertake any work or activity, on behalf of the person, that constitutes a relevant service.

**Relevant Service:** As defined in the Children First Act 2015 (ROI), this means any work or activity specified in Schedule 1 [of that Act].

**Relevant Person:** As defined in the Children First Act 2015 (ROI), this means a person who is appointed by a provider of a relevant service to be the first point of contact in respect of the provider's Child Safeguarding Statement.

**Statutory Authorities:** The authorities who promote the protection and welfare of young people and who have the responsibility for the investigation and/or validation of suspected child abuse, in the ROI it is TUSLA & An Garda Siochána.

Statutory Authority Guidelines on Child Protection: In the Republic of Ireland - Children First: National Guidance for the Protection and Welfare of Children, Department of Health and Children 2017 (ROI).

# CHAPTER 1 Introduction



## 1.1 Context

Concern Worldwide is committed to ensuring that the best interests of children and young people participating in our Global Citizenship programme is of paramount importance.

Our guiding principles and this guidance document are underpinned by national policy and legislation in ROI Children First: National Guidance for the Protection and Welfare of Children 2017, and the requirements under The Children First Act 2015.

This guidance is also informed by TUSLAs Child Safeguarding: A Guide for Policy, Procedure and Practice, the United Nations Convention on the Rights of the Child, The Child Care Act 1991, The Protections for Persons Reporting Child Abuse Act 1998 and the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016.

# 1.2 What is the purpose of this Guidance Document?

The aim of this guidance document is to ensure that the welfare of children will always come first. The rights of children will be protected and children will be respected at all times.

Furthermore, this document supports the Concern Board of Directors and Senior Management Team to meet their child safeguarding and child protection responsibilities which are cognisant of, and in line with, requirements under policy/legislation and with best practice.

In addition, this document sets out in detail the expected behaviour of staff and volunteers engaged by Concern in their dealings with children and management of activities involving children. The guidelines also outline how Concern will manage and report concerns and allegations of child abuse, exploitation and neglect.

# 1.3 Who are these guidelines for?

These guidelines apply to all employees and volunteers holding positions in Concern Worldwide RoI that require or facilitate regular and/or unsupervised contact with children. These guidelines are also for managers, directors and trustees who are responsible for ensuring that policies, systems and processes are adhered to in accordance with the Children First Act 2015.

# 1.4 Values and Principles

As an integral part of our wider Public Engagement strategy, Concern recognises the importance of young people for who they are in the 'here and now', as people who can bring an energy, perspective and intellect in creating a world 'where no-one lives in poverty, fear or oppression'. Encouraging the involvement of young people with Concern and more broadly with the Sustainable Development Goals agenda includes a range of measures that inform, emotionally engage and encourage action for change in accordance with Concern's vision and mission.

All staff and volunteers engaged by Concern are required to respect the rights and dignity of the children, families and communities with whom we work and/or with whom we have contact, and always act in their best interest.

There are a number of key principles of child protection and welfare that inform both policy and best practice for those working with children. These are outlined in Children First 2017 and include the guiding principles that 'the safety and welfare of children is everyone's responsibility and the best interests of the child should be paramount', and these inform all of Concern's activities involving children.

Principles of equality are included in Concern's Child Safeguarding policy where all children are treated with respect, recognising that they all have equal right to protection regardless of any personal characteristic, including their age, gender, ability, family status, culture, ethnicity and racial origin, religious beliefs and sexual identity.



# **CONCERN'S VALUES**

# We focus on extreme poverty

We are driven by a clear focus on eliminating poverty in the most vulnerable places and responding to humanitarian crises.

## We are courageous

Taking necessary risks, balanced with sound judgement, allows us to work in the most challenging contexts.

## We believe in equality

People are equal in rights and must be treated with respect and dignity.

## We are committed

Going the extra mile to support communities in times of need and in the face of very difficult operating environments.

## We listen

Listening and partnership are key to empowering the poorest and most vulnerable to transform their own

## We are innovative

Finding effective solutions requires innovative thinking combined with a pragmatic approach.

## We respond rapidly

People affected by disasters are entitled to have their most basic needs met through rapid, effective, and principled responses.

## We are accountable

Accountability and transparency are central to all of our actions and use of resources.

# **CHAPTER 2**

# Concern's work with children and youth in Ireland



# 2.1 Concern Schools and Youth Programme

Concern's Global Citizenship programme engages over 12,000 children and young people under the age of 18 on an annual basis through a mix of in person and online activities and programmes. Students involved in Concern activities come from primary schools, secondary schools youth centres and Youth Reach centres.

Whilst many engagements are with class groups in school settings, there are a significant number of engagements which take place without a teacher or youth worker present. All school engagements are done in conformity with Department of Education Child Safeguarding procedures and in the presence of teachers or other school staff. Any out of school or extracurricular activities without a teacher or youth worker present are undertaken with the full permission of teachers and parents/guardians.

A number of engagements (for example webinars, workshops or events) with young people are online using the video communications software Zoom. Any online workshops without a teacher or youth worker present require permission from parents/guardians.

Occasionally students are involved in fundraising activities for Concern Worldwide. In such instances it is the responsibility of the school to ensure that all Child Safeguarding measures, including supervision and parent/guardian permission have been put in place.



## 2.2 Concern All Island Debates

Concern's largest schools based activity is the all-Island Concern Debates Programme at both primary and secondary level. Each year up to 200 volunteer adjudicators are involved in the programme.

The majority of the Concern Debates programme is now facilitated online. Schools debate over an online platform, upload their video to the debates platform (Awards Force) and a volunteer adjudicator is assigned to watch the debate remotely. Permission from parents/guardians is sought for the online Concern Debates programme.

The programme moves to in-person debates at the quarter final stage. Debates are arranged in mid-way venues or schools in discussion with the teachers involved. A teacher expected to be present at all in-person debates, and consent is sought at the start of the year for any photographs or video that Concern takes for the purposes of promoting and celebrating the programme.

# **CHAPTER 3**

# Safe Management Practice and Code of Behaviour



## 3.1 What is child abuse or harm?

Child harm and abuse falls into four categories: physical abuse, sexual abuse, emotional abuse and neglect. It can occour within the family, in the community or in an institutional setting such as a school or a hospital. The abuser may be a stranger, or more often, someone a child knows. The abuser can be an adult or another child. Child abuse is not always obvious and the signs of abuse can be physical, behavioural or developmental. A child may make a disclosure to a trusted adult, or you may see something or a pattern which raises a concern. Disclosures should always be taken very seriously and must be reported immediately to the Designated Liaison Officer (DLP). See p14: Reporting Procedures for Known or Suspected cases of Child Abuse.

All employees with roles involving work with children must complete the TUSLA Child Protection training which trains people to understand the different forms of abuse; identify the signs of abuse; and to know how to respond if abuse is suspected or disclosed, identify the indicators, understand and appropriately respond to what child abuse is, the types of abuse, neglect and exploitation that exists and our collective duty to respond. The TUSLA training can be accessed here: <a href="https://www.tusla.ie/children-first/children-first-e-learning-programme/">https://www.tusla.ie/children-first/children-first-e-learning-programme/</a>

All staff must also take the Concern safeguarding module on the staff training portal and also undertake training by the National Youth Council of Ireland (NYCI) specific to the Irish context. The latter will be organised by the Schools Programme Manager every three years.

The welfare of the child is paramount in any activities involving children. Concern staff will employ safe management practices and adhere to a code of behaviour in order to minimise the possibility of harm or accidents happening to children and to protect workers from the necessity to take risks. Staff will be aware of the safe management practices and code of behaviour and agree to conduct themselves accordingly. See Appendix three.

## 3.2 Risk Assessments

Children First National Guidance 2017 (ROI) states clearly that organisations that provide services to children must ensure that they prevent, as far as practicable, deliberate harm or abuse to the children while availing of their services.

The risk assessment considers the potential for harm to come to children whilst they are in the relevant organisation's care. This risk assessment precedes the Child Safeguarding Statement (Section 11 (1b) Children First Act 2015 (ROI)) and informs the development of safeguarding policies and procedures to manage the risk identified. In accordance with Children First the risk is of abuse and not general health and safety.

Under the Children First Act 2015 (ROI), if your organisation is providing a relevant, service, you must:

- Keep children safe from harm while they are using your service.
- Carry out a risk assessment to identify whether a child or young person could be harmed while receiving your services.
- Develop a Child Safeguarding Statement that outlines the policies and procedures which are in place to manage the risks that have been identified.
- Appoint a relevant person to be the first point of contact in respect of the organisation's Child Safeguarding Statement.

A risk assessment is an exercise where your organisation examines all aspects of your service from a safeguarding perspective to establish whether there are any practices or features of your service that have the potential to put children at risk of harm.

The risk assessment process is intended to enable your organisation to:

- ✓ Identify potential risk.
- Develop policies and procedures to minimise risk by responding in a timely manner to potential risks.
- Review whether adequate precautions have been taken to eliminate or reduce these risks.

As stated in the Children First Act 2015 (ROI) the risk assessment is a legal requirement that must be undertaken by the providers of relevant services who engage with children and young people in Ireland.

# 3.3 Child Safeguarding Statement

The Children First Act 2015 (ROI) requires organisations in Ireland that are providers of relevant services to prepare a Child Safeguarding Statement.

The Child Safeguarding Statement is a written statement that specifies the service being provided and the principles, that a child availing of the service is safe from harm. Concern's service will ensure that our Child Safeguarding Statement has due regard to the Children First Guidance or equivalent and any other child protection guidelines issued by the relevant government departments or any guidelines issued by statutory authorities concerning Child Safeguarding Statements.

# What the Child Safeguarding Statement Contains:

As outlined above, the Children First Act 2015 (ROI) places obligations on organisations that provide relevant services to children. These obligations are:

- To keep children safe from harm while they are using the service (section 10) and promote the paramountcy principle that the welfare of the child is core
- 2. To carry out a risk assessment to identify whether a child or young person could be harmed while using the service
- 3. To develop a Child Safeguarding Statement (section 11.3) which must include both the written risk assessment and the procedures that are in place to appoint a relevant person to be the first point of contact in respect of the organisation's Child Safeguarding Statement

## Managing any risk identified

- Investigate an allegation against any staff/ volunteer member about any act, omission or circumstance in respect of a child availing of the service.
- Select and recruit staff /volunteer members who are suitable to work with children.
- Provide information and training to staff / volunteer members on child protection and safeguarding issues.



- Enabling staff/volunteer members in ROI, whether mandated persons or otherwise, to make a report to TUSLA in accordance with the Act or any guidelines issued by the statutory authorities. In NI reports are made to the Health and Social Care Trust in accordance with their guidance.
- Maintain a list of persons in the organisation who are mandated persons under the Act.
- Appoint a relevant person in the organisation for the purposes of the Act.

# 3.4 Child Safeguarding – Policies, Procedures and Practice

By carrying out a risk assessment and producing a Child Safeguarding Statement Concern is required to have in place detailed policies and procedures outlining how the organisation safeguards children and young people and addresses any potential risks identified.

The policies and procedures include the roles and responsibilities of the people within the organisation, safe recruitment and selection of people, and the procedures to follow in relation to identifying and reporting child welfare or child protection concerns, and responding to allegations against someone within the organisation.

## 3.4.1 Safe Recruitment Procedures

Concern will endeavour to recruit employees and volunteers who act in accordance with the standards held in Concern's Code of Conduct and Associated Policies. See Appendix one and two.

# **3.4.2** Consultants, contractors and others engaged on behalf of Concern

Consultants or short term events professionals, such as photographers, do not have an ongoing involvement; a necessary and regular part of which consists mainly of the person having access to, or contact with, children or vulnerable adults and so will not require Garda Vetting or be provided with any formal child protection related training by Concern. They will be given a copy of the Concern Code of Conduct and Associated Policies which they will be required to read, understand, sign and adhere to during the course of their involvement and this would form part of the agreement to engage their services.

## 3.4.3 Garda Vetting

Staff members in the Global Citizenship (GC) Unit will require satisfactory Garda Vetting prior to commencing in the role. See *Appendix one.* GC staff will renew the Garda Vetting process every three years.



Concern will comply with the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016. This Act provides a legislative requirement for the vetting of any person who is carrying out work or activity, a necessary and regular part of which consists mainly of the person having access to, or contact with, children or vulnerable adults.

The selection and screening process for volunteers includes an online application form, informal interview and Garda vetting. Training and induction sessions are facilitated so that people know and understand the expectations and desired behaviours. All volunteers and employees will be made aware of and comply with Concern's Safeguarding Children Guidelines along with the already mentioned Concern Code of Conduct and Associated Policies, will receive regular supervision and support from their designated supervisor.

## 3.4.4 Safeguarding Training

## Who is Safeguarding Training for?

Managers of staff whose jobs require the person having access to, or contact with, children or vulnerable adults will ensure staff are trained on all aspects of the Concern Code of Conduct with Associated Policies and Concern's Safeguarding Children Guidelines, including the Child Safeguarding Statement.

In addition, the employees of Concern working with young people will attend the Child Protection Awareness Programme (CPAP) which is the child protection training programme run by the National Youth Council of Ireland (NYCI) and the Children First E-Learning programme provided by TUSLA.

## What this training should include:

- A basic awareness and understanding of safeguarding issues and roles within Concern.
- Establishing minimum standards of best practice and codes of conduct.
- Exercises to identify, respond and report concerns.
- Signposting for further information and sources of support.

## 3.4.5 Roles and Responsibilities

In Concern, the Director of Protection and Safeguarding will hold the role of Designated Liaison Person (DLP) and the Head of Global Citizenship, the Schools Programme Manager and Safeguarding Advisor will hold the role of Deputy Designated Liaison Persons (DDLP). The DLP and DDLPs are knowledgeable on areas of child protection and will ensure that the standard reporting procedures are followed.

All complaints, allegations or suspicions of child abuse should be made to the DLP in the first instance without delay. If it's an emergency, you can contact An Garda Síochána.

It is not the responsibility of anyone working in a paid or voluntary capacity, or those working in affiliated organisations, to take responsibility or to decide whether or not child abuse is taking place. However there is a responsibility to protect children in order that appropriate agencies can then make enquiries and take any necessary action to protect the young person.



## 3.4.6 Reporting and Protection

The procedure in ROI for reporting child protection or welfare concerns to TUSLA is a specified procedure under the Children First Act 2015 (ROI) and should be done online following a discussion with TUSLA staff.

Staff and volunteers should be alert to the possibility that children with whom they are in contact may be being abused or at risk of being abused. They should know how to recognise and respond to the possibility of abuse or neglect, so as to ensure that the most effective steps are taken to protect a child and to contribute to the ongoing safety of children.

## **HOW TO REPORT**



**STEP 1:** The person making the allegation or reporting a reasonable grounds of concern must complete the Child Protection Standard Report Form for or with the DLP, including as much detail as possible with regard to the grounds for concern they have in relation to the child. Observations should include dates, times, names, locations, context and any other information that may be relevant. *See Appendix seven*.



**STEP 2:** The person making the report will meet with the DLP to go through the complaint in detail. If the DLP is unavailable, the Deputy DLP will take their place.



**STEP 3:** The DLP will consider whether there are reasonable grounds to report the matter to the Child and Family Agency (TUSLA) or An Garda Síochána. If there is some doubt about whether to report the matter formally, the DLP will call the Child and Family Agency/An Garda Síochána for advice without disclosing any names of the people involved. *See Appendix eight.* 

## Reasonable grounds for concern:

You should always inform TUSLA when you have reasonable grounds for concern that a child may have been, is being, or is at risk of being abused or neglected. If you ignore what may be symptoms of abuse, it could result in ongoing harm to the child. It is not necessary for you to prove that abuse has occurred to report a concern to TUSLA. All that is required is that you have reasonable grounds for concern. It is TUSLA's role to assess concerns that are reported to it. If you report a concern, you can be assured that your information will be carefully considered with any other information available and a child protection assessment will be carried out where sufficient risk is identified.

# Reasonable grounds for a child protection or welfare concern include:

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

# The guiding principles on reporting child abuse or neglect may be summarised as follows:

- 1. The safety and well-being of the child must take priority over concerns about adults against whom an allegation may be made. Parents will be notified that a report is being made, unless there is a risk to the child, the investigation or the reporting party. In the event of any potential or actual risk of harm to any party involved, advice and guidance will be sought immediately from TUSLA duty social workers or/and An Garda Síochána
- Reports of concerns should be made without delay to TUSLA

The above procedure will be followed for all allegations/complaints of child abuse including allegations/complaints made against employees, volunteers, consultants or other third parties.

The DLP will remain in contact with the authorities during any investigations that they are conducting until the external processes are concluded.

These procedures will be conducted in accordance with the Children First National Guidance for the Protection and Welfare of Children 2017.

Under no circumstances should any individual be left with a worry or concern about a child and feel they are unable to discuss it with Concern's Designated Liaison Person (DLP).

Any individual can contact TUSLA to discuss or report a child protection/welfare concern. Please see link to TUSLA website below.

If you think the child is in immediate danger and you cannot contact TUSLA, you should contact the Gardaí without delay.

# 3.4.7 Deciding Not to Make a Report to the Authorities

If in doubt, the DLP will seek advice from the Child and Family Agency on whether or not to report a complaint to the authorities. Following this, the DLP may decide that reasonable grounds for reporting the incident or suspicion to the authorities are not met and the DLP will then provide a statement to the person making the report stating clearly the reason why the organisation is not reporting the matter to the authorities.

The person making the report will also be advised that if they remain concerned about the situation, they are free to consult with, or report to, the Child and Family Agency or An Garda Síochána themselves. The provisions of the Protections for Persons Reporting Child Abuse Act, 1998 apply once the matter is reported 'reasonably and in good faith'.

# 3.4.8 Disciplinary, Complaints, and Appeals of Code of Behaviour Breaches

It is important to note that the investigation of suspected child abuse is the responsibility of the Statutory Authorities and should not be undertaken by the Protection and Safeguarding Unit/Mandated Persons or Designated Liason Persons.

The standard reporting procedure outlined in the Statutory Authorities guidelines should be followed and adhered to.

Only following advice from statutory agencies about suspected child abuse cases should Concern begin their own internal disciplinary procedures to ensure they do not impact on any statutory investigation.

## 3.4.9 Dealing with Allegations

Concern will follow the best practice guidelines as outlined in the 'Child Safeguarding: A Guide for Policy, Procedure and Practice', as follows:

Reported allegations/suspicions of child abuse will be investigated externally by the relevant authorities including the Child and Family Agency and An Garda Síochána. Concern will cooperate fully with an external investigation as required.

If the allegation/complaint relates to a Concern employee or volunteer, they will be informed of the allegation/complaint or suspicion against them and that the matter has been reported to the authorities (so long as informing the staff member does not compromise the safety of the child, guidance will sought from the Child and Family Agency or An Garda Síochána).

The employee/volunteer will be informed of any decision to remove or suspend them from any or all duties or solely duties that involve working with children. This decision will be made using the guiding principle that the safety of the child is always the most important consideration.

Concern has investigation procedures in place to ensure an internal administrative investigation is conducted in a thorough and fair manner. Any corrective action will be taken under Concern's disciplinary procedures up to and including dismissal of an employee or end of involvement for volunteers or consultants and (sub-)contractors.



Having an external investigation and an internal administrative investigation under way at the same time may compromise the external investigation and so it may be appropriate to delay the internal administrative investigation. Guidance will be taken from the relevant authorities as to whether an internal and external investigation can run simultaneously.

Concern does not have the right to interview any child or other external parties with regard to a complaint of child abuse in any internal investigation procedure.

## 3.4.10 Retrospective Reporting

In the case of receiving a retrospective disclosure from an adult, consideration will be given to the current or potential risk to any child who may be in contact with the alleged abuser. Adult reporters should be encouraged and supported to report their abuse. Investigations of disclosures by adult victims of past abuse frequently uncover current incidences of abuse. This is therefore an effective means of stopping the cycle of abuse. Concern has a duty to report any concerns they have. Advice will be sought from TUSLA on reporting retrospective disclosures.

## 3.4.11 Provision of Support

If an alleged incident of child abuse takes place in connection with Concern activities, Concern undertakes to provide support for the alleged victims and the alleged abuser whilst any investigation is on-going, either by the civil authorities or internally.

## 3.4.12 Confidentiality

All complaints/reports will be handled with the strictest confidentiality and the information will only be shared with relevant parties (The Child and Family Agency, An Garda Síochána, Parents/ Guardians, staff of Concern Worldwide) on a need-to-know basis. Sharing information with the statutory authorities and other relevant parties will not be regarded as a breach of confidentiality. Advice will be taken from the statutory authorities with regard to sharing information with any other relevant parties. Those involved in any internal investigation will be required to sign a pledge of confidentiality. Breach of confidentiality will result in disciplinary action up to and including dismissal or the ending of the volunteer placement.

## 3.4.13 Record Keeping

The Internal Audit and Investigations Unit will keep a record of all child safeguarding complaints received and note whether or not the matter was reported to the Child and Family Agency/ An Garda Síochána. The rationale for not making a report to the authorities will also be noted. Records will be stored with perpetuity in a secure location.

## 3.4.14 Victimisation and Retaliation

Anyone reporting allegations or suspicions of child abuse and/or involved in resulting investigations will be protected against any form of intimidation, threats, reprisal or retaliation resulting from the alleged incident.

Victimisation and retaliation will be taken very seriously by Concern and will not be tolerated. Anyone who is being subjected to any form of victimisation should report it immediately to the Protection and Safeguarding Unit. Such reports will be investigated and if the investigation confirms that the witness has experienced victimisation and the perpetrator is an employee of Concern, the normal disciplinary proceedings will be instigated against the perpetrator. Employees are also protected under the 1998 'Protection for Persons Reporting Act' if the report was made reasonably and in good faith.

## 3.4.15 Malicious Complaints

The Concern Code of Conduct and Associated Policies require that employees and volunteers report any incident, abuse or concern that they have witnessed, been made aware of or suspect. So long as a complaint has been made in good faith, there will not be any recrimination against the complainant. The 'Protection for Persons Reporting Child Abuse Act, 1998' provides immunity from civil liability to persons who report child abuse 'reasonably and in good faith' to the Child and Family Agency or An Garda Síochána.

Investigation findings may prove that an allegation or complaint was intentionally false and made maliciously or in bad faith. In such a case, disciplinary procedures will be initiated against the complainant where they are an employee and a similar procedure would apply to volunteers where they would be afforded the principles of natural justice, however should the claim be substantiated, it may result in dismissal or the end of the volunteer placement.

It should be noted that just because a complaint is found to be unsubstantiated or untrue, it does not automatically mean that the complaint was made maliciously.

# 3.5 Implementation, Monitoring and Review

Concern has a long established practice to ensure that all of its policies, procedures and practices are fully implemented, which requires an implementation plan. This plan sets out the tasks required to fully realise all procedures, and to ensure that these are regularly reviewed and updated in line with ongoing risk assessments, developments in best practice and any changes to policy and legislation.

# **CHAPTER 4**

# Information for Children, Parents and Teachers



## 4.1 Information on Concern activities

Information on Concern activities with children is made available on Concern's website. This information includes Concern's safe management practices, code of conduct and associated policies and our complaints procedure.

See Appendix five.

# 4.2 Parental Permission and Best Practice working with schools and partners

Consent forms will not be sought for any school based activities, but will be sought by Concern for any external (off site) engagements. Consent forms will not be sought for online engagements if teachers/ youth worker are on the call with their students. Schools/ youth centres participating in off-site activities organised by Concern Worldwide will fall under the Concern's Safeguarding Children Guidelines.

Parents/Guardians will be asked to sign consent forms for students attending online or in person events if a teacher or youth worker is not present, and to inform Concern of any medical, dietary or other educational or access needs of the child.

It is our practice to discuss and agree with the organising teacher of the school which child safeguarding principles apply; that of the school or Concern.

Typically, it will be that of the school/youth centre where a Concern staff member is on school/youth centre premises. The DLP would be that of the school/youth centre in this instance.

Employees arranging such events should refer to the *Appendix ten* checklist to establish agreement with the school on applicable safeguarding framework.

There is also a check list for employees facilitating a talk or workshop in the Concern office or an external venue (Appendix 12). This checklist should be used by Concern staff organising the event to ensure that all guidelines and procedures have been followed and there is a clear understanding of which safeguarding framework is to apply.

For overseas trips, parent/guardians will be asked to sign a permission form to give their child permission to travel with Concern.

For activities out of school where children sign up

as individuals rather than through their teachers (for example TY Academy), permission will be sought from the child's parents/guardians, who will be informed of Concern's Safeguarding Children Guidelines, Concern Code of Conduct and Associated Policies and our complaints procedure (as outlined earlier).

# 4.3 Incidents and Accidents Procedures

An incident log for non-school based engagements organised by Concern and led by Concern staff will be maintained. Staff will record any accidents or incidents as soon as possible after the event occurs by completing the Incident Record Form (Appendix six). On return to the Concern office, the staff member will report the incident to the Schools Programme Manager and log the incident in the central Incident log. Incidents of a potential or actual safeguarding matter will be shared with the Director of Protection and Safeguarding/DLP as soon as it is possible to raise the Concern.

In the event that a child is injured during a Concern event, the parents will be contacted immediately; either directly or through the school where the school has arranged relevant permissions.

In the event of any incident involving children engaging in bullying or any form of abuse, the incident will be reported to the school or parent where appropriate and to the Concern Protection and Safeguarding Unit or DLP. At least one staff member on any non-school based activity will be trained in basic first aid procedures and will ensure that a first aid box is readily available.

Emergency numbers will also be on hand for nonschool based activities.

# **CHAPTER 5**

# Information for Volunteer Adjudicators with the Concern Debates Programme



# **Volunteer Adjudicators**

Concern's largest schools based activity is the All Island Concern Debates programme and the Concern Primary Debates Programme. The Debates are educational programmes which are facilitated initially online, before moving to in person debates in the latter stages. The debates are judged by volunteers who act as adjudicators. All adjudicators must be Garda Vetted every three years (Appendix Two) and interviewed by one of the debates programme officers. Volunteer Adjudicators must complete safeguarding training as part of their induction, and attend a refresher each year they volunteer. A record of volunteers attending training will be kept in Concern's Debates Database.

Concern has developed the following procedures that volunteer adjudicators and staff are obliged to follow when coming into contact with children (any person under the age of 18 years) in the course of their volunteer activity. By adhering to these procedures, children will be safe from abuse by employees and volunteers of Concern and the possibility of misunderstanding, or the potential for allegations of misconduct will be minimised.

# All volunteers adjudicating <u>in person</u> Debates <u>must;</u>

- Endeavour to never be alone with a student.
   If greeted alone by a single student when
   entering a school premises, adjudicators
   should remain the reception area and ask
   student to return with another student or a
   member of staff.
- Interact with children in a respectful and appropriate manner.
- Safeguard children and avoid situations that could be misinterpreted or lead to false allegations of child abuse. For example offering lifts to children to or from debates.
- Report any known or suspected cases of child abuse to the Designated Liaison Officer (see below for details) in Concern.
- Respect a child's right to personal privacy.
- Behave in a way that sets a good example for children.
- Challenge inappropriate behaviour among children such as bullying.
- Create an environment which encourages children to raise any issues regarding poor behaviours or attitudes in others.

- Avoid inappropriate physical or verbal contact with children, particularly when delivering feedback.
- be mindful that caution is required in one-toone situations, even in sensitive situations such as dealing with an upset child.
- avoid showing favouritism to any individual.

# All volunteers adjudicating an online debate (live or pre recorded);

- Must not take photos or screenshots when adjudicating an online debate.
- Must not post photos or screenshots to social media.
- Must not attempt to contact students through chat feature (live debates).
- Must not attempt to contact teacher or school through chat feature.
- Make sure all feedback delivered either in person or written is appropriate and respectful.



# Appendices





# Recruitment Procedures for Staff who have Contact with Children in Concern ROI

## **Background:**

Concern Worldwide will comply with the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016. This Act provides a legislative requirement for the vetting of persons who seek positions of employment relating to children or vulnerable persons.

Any position that requires or facilitates regular and/or unsupervised contact with children will require Garda Vetting prior to commencement.

## **Vetting in the Recruitment Process:**

In recruitment for positions of employment roles that work with young people, Concern will

- Look at a safeguarding risk assessment of the role
- 2. Make sure job description/ volunteer role includes safeguarding competencies
- Ensure permission is sought and understood around self declaration of criminal convictions, reference and qualifications checking
- 4. Assess safeguarding awareness at interview
- 5. Share CCoC and APs (Signed)
- 6. Ensure successful applicants to complete Learning 365 module
- Ensure successful volunteer applicants to complete safeguarding training on annual basis
- 8. Ensure safeguarding is standing agenda item when meeting with staff and volunteers

Where Garda Vetting is required for a particular role, the following process will apply:

- Job descriptions/ volunteer roles will state that Garda Vetting is required as part of the recruitment process.
- Candidates who meet the criteria of the role will be progressed in the recruitment process which, depending on the position, may include a presentation and face-to-face or skype interview.

- At interview, the candidate will be asked to produce photographic evidence as proof of identification (in person or by skype call) and to confirm that they are eligible to be employed in Ireland as part of the recruitment process (the latter for employees only).
- They will also be required to provide proof of address. HR will take a copy of the photographic evidence and verify that they have seen the original. This documentation must be obtained before a candidate can be appointed.
- Following interview, reference checks will be conducted for the shortlisted candidate. Two references (minimum) will be secured for each candidate (employee). Referees will be nominated by the candidate and will be requested to complete the reference questionnaire form.
- Referees will be specifically asked about the candidate's suitability to work with children and vulnerable people and if they know of any matter related to the character, integrity or personal behaviour of the candidate that should prevent Concern from offering them a job or volunteer placement.
- Referees must be previous supervisors in an employment or volunteering relationship.
   Should candidates have limited employment or volunteering experience, references from academic institutions in which they attended or members of standing within the community can provide character references but it is preferable that previous employment references are obtained, ideally from the latest employer.
- After the normal selection process (interviews, technical tests and references checks etc.) the shortlisted candidate will be asked to complete a Garda Vetting Application form. Concern will submit the Garda Vetting Application form to the National Vetting Bureau. This can be done online and the candidate should be advised to check their email account to progress this.
- The Garda Vetting Disclosure will be received by Concern prior to taking any decision to extend a job or volunteer offer to a candidate.

# **Garda Vetting for Existing Staff**

Garda vetting for existing staff will be conducted every three years.

Concern reserves the right to re-vet employees at their discretion should any new information come to their attention.

# Storage and Retention of Garda Vetting Disclosures

Garda Vetting Disclosures will be stored in line with GDPR requirements.

Garda Vetting Disclosure will be kept in Concern's employee file and will store a copy of the vetting disclosure which will only be accessible to HR or designated staff.

Garda Vetting Disclosures of unsuccessful candidates will be stored with the interview notes and destroyed after 12 months in compliance with GDPR.

# Sharing of Garda Vetting Disclosures

All data received from the National Vetting Bureau is for the sole use of Concern Worldwide and will not be shared with anyone outside of the organisation.

A copy of the Garda Vetting Disclosure form will be made available to the candidate on request if within the retention period.

# **Dispute Resolution**

A Garda Vetting subject who disputes the findings of the Garda Vetting Disclosure may wish to activate the dispute resolution procedures. They can do this by indicating the basis of their dispute in writing to the authorized signatory in Concern who received the Garda Vetting Disclosure. The authorised signatory then resubmits the complete application file to the National Vetting Bureau who will conduct further checks. The authorised signatory contact details are available from line managers or the ROI HR Department.

# Deciding on the suitability of candidates to work in positions that require contact with children

Concern Worldwide is committed to the principles of being an equal opportunities employer and recognises that many potential employees and

volunteers may be ex-offenders and/or have criminal records, and might be reluctant to apply for roles that would involve the disclosure of this. We understand that people are often ashamed and embarrassed about their cautions and convictions, and fear they will not be treated fairly because of them. We also understand that obtaining gainful employment or voluntary work can enable people who have put their criminal past behind them to become productive, financially independent members of society. We would like to reassure all our potential employees that we judge everybody first and foremost on their skills, experience and merits.

Details of Garda Vetting Disclosures will be verified with the Vetting Subject in advance of a decision being made which may adversely affect them. This will be done in a face to face meeting. Following this discussion, the line manager and a member of the Protection and Safeguarding Unit team will conduct a risk assessment as outlined below prior to making the decision to extend a job role offer.

Decisions will be made on an individual basis using the following risk assessment;

- Concern's Code of Conduct and Associated Policies
- The nature and seriousness of the crime
- · When it happened
- · The circumstances involved
- The sentence
- If there are any convictions, the age, pattern and number of convictions
- The conduct of the individual in the time elapsed since any such offence was committed
- Relevance of the conviction(s) to the post
- · Safeguards against offending at work
- Possible reactions of employees, families, funders etc

(Reasonable measures must be taken to ensure the candidates suitability; this may include contacting the relevant Gardaí with the candidate's consent.)

Permission will be sought from the Director of Protection and Safeguarding or the Chief Operations Officer to employ or continue to employ a person who has been the subject of previous criminal charges or who has a previous criminal convictions record.

If the person is already employed they will be given the opportunity to clarify the circumstances around their conviction. Appendix 2

# **Recruitment Procedures for Volunteers who have contact with children in Concern ROI**

## **Background:**

Concern Worldwide will comply with the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016. This Act provides a legislative requirement for the vetting of persons who seek positions of employment relating to children or vulnerable persons. Any position that requires or facilitates regular and/or unsupervised contact with children will require Garda Vetting prior to commencement.

# **Vetting in the Recruitment Process:**

In recruitment for volunteer roles that work with young people, Concern will

- Look at a safeguarding risk assessment of the role
- 2. Make sure volunteer role includes safeguarding competencies
- 3. Assess safeguarding awareness at interview
- Share CCoC and APs through volunteer registration
- 5. Ensure successful volunteer applicants to complete safeguarding training on annual basis with Concern and recommend that all volunteers undertake the Túsla children first e-learning module.

Where Garda Vetting is required for a volunteering role the following process will apply:

- The role description will state that Garda Vetting is required as part of the recruitment process.
- Candidates who meet the criteria of the role will be progressed in the recruitment process which will include phone or zoom interview.
- At interview, the candidate will be asked to produce photographic evidence as proof of identification (in person or by skype call).
   Volunteers may also email documents after interview

- Concern staff will assess interview answers and decide if candidate is suitable and successful.
- After selection process (application form and interview) the person who wants to volunteer will be asked to complete a Garda Vetting application form. Concern will submit the Garda Vetting Application form to the National Vetting Bureau. This can be done online and the candidate should be advised to check their email account to progress this.
- The Garda Vetting Disclosure will be received by Concern prior to taking any decision to extend a job or volunteer offer to a candidate.

# Garda Vetting for Existing Volunteers

Garda vetting for volunteers will be conducted every three years.

Concern reserves the right to re-vet volunteers at their discretion should any new information come to their attention.

Concern will ask volunteers to register each year and refresh their training.

# Storage and Retention of Garda Vetting Disclosures

Garda Vetting Disclosures will be stored in line with GDPR requirements.

Garda Vetting Disclosure will be kept in Concern's volunteer and will store a copy of the vetting disclosure which will only be accessible to designated staff.

Garda Vetting Disclosures of unsuccessful candidates will be stored with the interview notes and destroyed after 12 months in compliance with GDPR.

# Sharing of Garda Vetting Disclosures

All data received from the National Vetting Bureau is for the sole use of Concern Worldwide and will not be shared with anyone outside of the organisation.

A copy of the Garda Vetting Disclosure form will be made available to the candidate on request if within the retention period.

## **Dispute Resolution**

A Garda Vetting subject who disputes the findings of the Garda Vetting Disclosure may wish to activate the dispute resolution procedures. They can do this by indicating the basis of their dispute in writing to the authorised signatory in Concern who received the Garda Vetting Disclosure. The authorised signatory then resubmits the complete application file to the National Vetting Bureau who will conduct further checks. The authorised signatory contact details are available from line managers or the ROI HR Department.

# Deciding on the suitability of candidates to work in positions that require contact with children

Concern Worldwide is committed to the principles of being an equal opportunities employer and recognises that potential employees and volunteers may be ex-offenders and/or have criminal records, and might be reluctant to apply for roles that would involve the disclosure of them. We understand that people are often ashamed and embarrassed about their cautions and convictions, and fear they will not be treated fairly because of them. We also understand that obtaining gainful employment or voluntary work can enable people who have put their criminal past behind them to become productive, financially independent members of society. We would like to reassure all our potential volunteers that we judge everybody first and foremost on their skills, experience and merits.

Details of Garda Vetting Disclosures will be verified with the Vetting Subject in advance of a decision being made which may adversely affect them. This will be done in a face to face meeting. Following this discussion, the line manager and a member of the HR team will conduct a risk assessment as outlined below prior to making the decision to extend a job or volunteer role offer.

Decisions will be made on an individual basis using the following risk assessment;

- Concern's Code of Conduct and Associated Policies
  - The nature and seriousness of the crime
  - When it happened
  - · The circumstances involved
  - The sentence
  - If there are any convictions, the age, pattern and number of convictions
  - The conduct of the individual in the time elapsed since any such offence was committed
  - Relevance of the conviction(s) to the post
  - · Safeguards against offending at work
  - Possible reactions of employees, families, funders etc.

(Reasonable measures must be taken to ensure the candidates suitability; this may include contacting the relevant Gardaí with the candidate's consent.)

Permission will be sought from the Director of Human Resources or the Chief Operations Officer to employ or continue to recruit the person who has been the subject of previous criminal charges or who has a previous criminal convictions record.

If the person is already in a volunteer position they will be given the opportunity to clarify the circumstances around their conviction.

Note: Due to the limited nature of interaction of volunteers and children in the Concern Debates Programme, references will not be required for volunteer adjudicators.



# Safe Management Practices and Code of Behaviour for Safeguarding Children for in person and online engagements

## **Safe Management Practices**

Children are less likely to experience harm or accidents if they are supervised properly. Activities will be organised so that they maximise participation, fun and learning but also safety.

## Concern Staff Attending Schools/ Youth Centres

Concern staff will:

- Attend a school only if invited by a teacher/ youth worker for a specific purpose;
- Sign into the reception area where possible;
- Request that a teacher/worker remains present in the classroom or hall at all times during the engagement;
- Request name of DLP on school premises.
- Fill in relevant checklist (Appendix 10).



# Concern Staff Facilitating Online engagements with teachers/youth workers present on call

Concern staff will:

- Set up zoom call as per guidelines (Appendix nine)
- Ensure that the teacher/youth worker remain present on the call at all times
- Fill in relevant checklist (Appendix 11)
- No consent forms are needed if teacher is present

# Concern Staff Facilitating and engagement in the Concern office or an external venue

Concern staff will:

- Ensure a ratio of one adult for every 15 children with a minimum of two Concern staff present at all times
- Obtain consent forms for children (Appendix 14)
- Maintain attendance list and note any late arrivals, no shows or early departures.
   Teachers/youth workers and parent/ guardians to be contacted if a child fails to turn up
- Ensure students wear name tags with colour codes to indicate consent around photography
- Endeavour never to alone with a child except in exceptional circumstances such as bringing a late comer to the group/ medical emergency
- Have content /trigger warnings included at the start of the session if some of the engagement deals with sensitive issues
- Follow and fill in checklist as per Appendix 12

# Concern Staff Facilitating an online engagement with no teacher or youth worker present

Concern staff will:

- Set up zoom call as per guidelines (Appendix nine)
- Ensure there are at least two staff present on the call
- Maintain attendance list and note any late arrivals, no shows or early departures. Teachers and youth workers are to be contacted if a child fails to turn up
- Have content /trigger warnings included at the start of the session if some of the engagement deals with sensitive issues
- Ensure consent forms obtained for all children attending (Appendix 14)
- Fill in relevant checklist (Appendix 13)

# Concern Staff taking children on an overseas trip with their teacher present

Concern staff will:

- Ensure consent is obtained from parents/ guardians
- Have pre departure meeting with parents/ guardians and children
- · Have debriefing meeting after trip if necessary
- Ensure that the child will have participated in security briefing sessions with Concern staff including the Concern Health Officer and have fulfilled any medical requirements prior to departing
- Ensure at least one staff member on the trip is trained in basic first aid procedures and that a first aid box is readily available, and that emergency contact numbers are available
- Ensure the students and accompanying staff receive a security briefing on arrival by the security focal point in country (Concern Programme Country only) and sign that they have attended this briefing
- Make sure children and parents understand and sign the behaviour guidelines



- Make sure children sign Concern Code of Conduct and Associated Policies.
- Give children a 'help me' card and contact details for leaders
- Be responsible to support visa applications.
   It is the responsibility of the parent / guardian that the child has an in-date passport
- The lead staff member will keep printed copies of the travel documents for all trip participants for the duration of the trip, and a digital copy accessible to staff in the office
- Ensure insurance cover for all aspects of traveling
- Share detailed travel itinerary shared with students and parents

Ensure children are aware of the options available to provide feedback or complain, and what the expected and prohibited behaviours of Concern staff and associated personnel.



# Safe Management Practices and Code of Behaviour regarding photography, email and video recording and use of social media

# Photographs, Social Media and Communication

Where social media and/or photographs are a feature of any Concern activity, staff will:

- Ensure that consent is obtained from parent/ guardians in advance of the event, and by asking the participant themselves on the day before to taking any photos/videos
- Ensure children wear name tags at events with colour coded sticker to indicate consent re photography
- Ensure that photographs taken focus on the event itself rather than focusing on a particular child
- Protect the identity of a child by naming the school but not necessarily give the name of a child in the picture (unless explicit permission is given by a teacher or parent/guardian)
- Only use images of students in suitable attire
- Not contact children privately through on-line chat-rooms or personal social media accounts such as Facebook, Twitter and Instagram
- Not give children access to personal social network accounts or send 'friend requests' of any kind



- Not individually 'tag' photographs of students on social media sites without the expressed permission of a teacher or the child's parent/ guardian
- Communication with children only takes place when prior consent has been obtained from parent / guardian and always in relation to specific programme / activities that the child is already engaged in. When emails are received by Concern Worldwide, they are verified with the teacher or parent/guardian copied into any email correspondence.

# Concern Code of Conduct and Associated Policies

Concern takes all reasonable steps to protect beneficiaries from harassment and will endeavour to prevent abuse being perpetrated by Concern staff, our partner organisations or others involved with our work, such as consultants, volunteers, interns or visitors.

Our Concern Code of Conduct and Associated Policies; the Programme Participant Protection Policy, Child Safeguarding Policy and the Anti-Trafficking in Persons Policy have been developed to ensure the maximum protection of programme participants from exploitation and to clarify the responsibilities of Concern staff and the standards of behaviour expected of them.

The associated policies of Anti Trafficking and Child Safeguarding and Programme Participant Protection Policy form part of our overall Concern Code of Conduct. . In this context, staff are expected to behave in an acceptable way when carrying out duties on behalf of the organisation. Staff should seek to obtain the highest standards in their work and be mindful of the public profile of the organisation.

You are required to adhere to the Concern Code of Conduct and Associated Policies at all times. Any breach of the Concern Code of Conduct and Associated Policies will result in disciplinary action up to and including dismissal or termination of the volunteer placement. You can find the full Concern Code of Conduct and Associated Policies at https://www.concern.net/accountability/codes-and-policies/safeguarding or through relevant line manager or supervisor.



# Information for Parents and Teachers whose Children/Students will be attending a Concern Worldwide event or activity

## Introduction

Concern is committed to ensuring the welfare of children involved in any of our events or activities. This document lays out the key points from our Safeguarding Children Guidelines which parents, guardians and teachers need to be aware of if their children/students under 18 years of age are taking part in a Concern Worldwide event or activity in the Republic of Ireland.

Concern will provide this information to all teachers whose students are taking part in Concern events, and to parents/guardians and children when children are taking part in events organised independently of the school or when children are participating on overnight activities and/or trips abroad.

# **Background**

Concern organises various educational activities to encourage young people to play an active part in shaping a more equal and just world. These activities include the Concern Debates, and a range of workshops, talks and events specifically for young people. Occasionally as part of these activities Concern staff accompany students on overnight stays on trips overseas to Europe, the USA and Concern's programme areas in Africa, Asia and the Caribbean. Concern occasionally facilitates students on work experience placements in our office in Dublin. This guide applies to all of these activities.

The Concern's policy on Child Protection is provided as part of this document, the management practices Concern uses to ensure the safety of children taking part in our activities, and the Concern Code of Conduct and Associated Policies which all our staff and volunteers who work with children must adhere to. It also explains the process parents or guardians, teachers and school administration, and children themselves can use to make a complaint regarding any aspect of a Concern activity. Specifically it outlines the complaints process a person should follow if they have any concerns relating to the safety and welfare of a child engaged in Concern activities. It also covers the behavior expected by a child taking part in Concern's activities.

## **Concern - Safeguarding Children**

Concern has a document called Concern Safeguarding Children Guidelines which lays out our child protection guidelines for the Republic of Ireland. These guidelines are in line with the Children First Legislation and National Vetting Bureau (Children and Vulnerable Persons) Act. All Concern ROI staff and volunteers whose roles require or facilitate regular and/or unsupervised contact with children must read and adhere to these guidelines. The Concern Safeguarding Children Guidelines build on the existing Concern Code of Conduct and Associated Policies; namely the the Programme Participant Protection Policy, Child Safeguarding Policy and the Anti-Trafficking in Persons Policy which all Concern staff must adhere to. In addition any staff members employed in a role in the Republic of Ireland working directly with children undergo Garda Vetting and reference checking.

If you would like to read either of these documents in full you can request a copy by phoning 01 417 8078 or emailing schools@concern.net.

## **Code of Behaviour for Students**

At our events Concern wishes to create an atmosphere in which children feel safe to express their views, ask questions, enjoy and actively engage in activities. Our events and workshops are intended to be fun and engaging as well as educational. We hope students will go away feeling that they can make a difference in the world. To make sure this happens, all participants must uphold a certain level of behaviour. Students are asked to:

- Behave in a manner which is respectful to all other participants, event organizers and facilitators;
- Engage in group activities and exercises in a way that is constructive and meaningful;
- Take their turn in activities, and allow others to also take their turn;
- Listen to others and be willing to consider other points of view;

- Not cause any damage to property or the venue, including making sure to put rubbish in bins or take it away with them;
- Be on time for activities:
- Remember that on trips they are representing both their school and Concern and should behave appropriately;
- Tell Concern staff at an event immediately if they are ill, feel uncomfortable about any situation, or have a problem;
- Follow instructions of Concern staff with regard to health and safety, and security on overseas trips;
- Abstain from drugs or alcohol, before and during a Concern event.

Concern reserves the right to remove children from activities or send them home from trips if they are behaving in a disruptive manner, or causing potential danger to other participants. This is especially relevant on overseas trips to Concern field programmes where their behaviour could have an impact on Concern's reputation in a particular country.

## **Accidents and Incidents**

Concern staff will maintain a log of any accidents or incidents which take place at any events or activities organized by Concern.

If a child is injured during a Concern event, contact will be made immediately with the child's school (if the activity was arranged through the school) or parent (if the activity was arranged directly with them).

Any other incidents, for example bullying, will be reported to the school or parent as above.

Incidents or suspicions of child abuse witnessed by, or reported to Concern staff or volunteers will be reported to the Concern Designated Liaison Person who will decide on the best course of action including reporting to An Garda Síochána, the Child and Family Agency, schools and parents.

# **Complaints process**

Any child involved in Concern's events and activities, their parents or guardians, and their teachers or school management, have the right to make a complaint to Concern about the organisation or content of our schools programme activities and events, the behavior of our staff involved in such events and activities, and any suspected or reported incidents of child abuse regarding any child participating in a Concern run activity or event.

Concern will make all students, teachers and parents aware of the right to make a complaint, and the procedures for doing so. This information is also available on the Concern website.

There are three levels of complaint you can make about one of Concern's educational activities.

## a. Making a complaint to Concern's Global Citizenship team

You can complain directly to Concern's Global Citizenship team if you think there was a problem with any of our activities or events. For example, if you had a complaint about something that happened at a Concern Debate or a workshop, if you thought our competition rules were unfair, or if you were unhappy about the venue for an event, you should contact us directly by telephone or email. We are happy to talk through complaints but we will request that you put your complaint in writing, so that we have a full record of it, and can investigate it thoroughly. The complaint will be followed up by the Global Citizenship team, and a written response will be issued within two weeks. If a complaint involves a specific member of staff, it will be handled by that person's line manager through the applicable procedure.

We also accept positive feedback! So if your child really enjoyed taking part in Concern's activities or learnt a lot from the experience, please do let us know.

- By post to: Concern Global Citizenship Team, Concern Worldwide, 52-55 Lower Camden Street, Dublin 2
- Phone: 01 417 7733;
- Email: schools@concern.net
   (or debates@concern.net for complaints
   or feedback specifically related to the
   Concern Debates competition).

# b. Making a complaint to Concern's head office complaints management group

If you are not satisfied with the response you receive from the Global Citizenship team, you can make a direct and formal complaint to Concern's Head Office Complaints Management Group, through Concern's official Complaints Response Mechanism (CRM). This might also be a relevant option to take if it relates to a legal or health and safety issue, or if you think your complaint is of a child safeguarding nature, or if your complaint relates to the behavior of a member of staff. You can find further details about this on Concern's website at https://www.concern.net/contact-us/complaints or contact

the Complaints Management Group using the following methods:

- By post marked "Private & Confidential" to: HO Complaints Management Group, Concern Worldwide, 52-55 Lower Camden Street, Dublin 2.
- Email: complaints@concern.net
- Phone: 01 417 7700 and state you wish to make a complaint

# c. Reporting abuse or making a complaint regarding the safety and welfare of a child

If you have a complaint specifically related to the welfare of a child, or believe you have information about an incident of child abuse involving a child taking part in Concern's educational activities, or a Concern staff member or volunteer you can report it directly to Concern's Designated Liaison Officer (DLP). The DLP is the Head of Safeguarding who has been trained in Child Protection issues. Depending on the level of seriousness of the incident, Concern's DLP may then refer the matter to the Child and Family Agency or An Garda Síochána.

## Designated Liaison Person (DLP):

## **David Jones**

Director of Protection and Safeguarding

Email: david.jones@concern.net or safeguarding@concern.net

Phone: 00447900766642

# Deputy Designated Liaison Person (DDPP): Lauren Wright

Head of Global Citizenship Work Phone: 01 417 7748 Mobile: 087 9555979

Email: lauren.wright@concern.net



All complaints are investigated regardless of the source or date of occurence. The quality and nature of information available in anonymous complaints may impact on the capacity to investigate and respond appropriately. Regarding historical complaints, the welfare and wishes of the person and the potential for ongoing risk will guide the response. Any person who is identified in the complaint whether historical or current, made anonymously or otherwise has a right to be made aware of the information received (retrospective disclosure).

## **Permission**

When children still in formal second level education take part in Concern engagements and activities without teacher supervision, Concern seeks permission directly from the child's parents/guardian and school. This includes overnight trips, travel and external events (not on the school/youth centre site or online without teacher/youth worker supervision).

In cases where the child's involvement is being arranged through the school with a teacher in attendance, it is expected that the school will follow its own child protection procedures and permission procedures. This includes attendance at workshops, talks, collections, fairs, and any other Concern events taking place outside the school premises. In this case, Concern will not seek permission forms; however we will ask for information about any medical requirements, allergies, dietary requirements, or other special needs (where relevant to the activities taking place) of students attending to ensure that all students can access the engagement in a safe and meaningful way.

# **Emailing Young People under 18**

If a young person emails Concern staff member, the Concern staff member will

- 1. Thank the young person for their email
- 2. Ask young person to cc in teacher/youth worker or parent guardian
- Once young person has cc'd adult in email communication, Concern staff member will respond
- 4. Concern staff will not communicate with young people via email without parent/ guardian/teacher/youth worker cc'd OR without prior consent

If young person emails Concern staff member in which communication consent has been obtained by parent/guardian, Concern staff member will email young person as per consent preferences ( with or without parent/guardian cc'd)

# Appendix Child Protection Standard Incident Record Form

## **Incident Record Form**

This record sheet is to be used to log any accidents or incidents which take place in the course of, or directly related to, Concern Worldwide events (both in person and online) or activities involving children under the age of 18. Incidences should be taken to include any accidents or injuries, or any inappropriate behaviour.

This form should be completed by the Concern staff member who witnessed the incident involved within 24 hours of the incident occurring. The Concern DLP or DDLP should be notified of the incident prior to completing this form. On return to the Concern office, the incident should be reported to the Schools Programme Manager and logged in the Incident Log.

Name of Concern staff member filling out this log:	
Other Concern staff present at the incident:	
Date and Time of incident:	
Location of incident:	
Name(s) and school(s) of children involved:	
Name(s) and school(s) of teachers involved:	
Details of any other witnesses:	
Description of the incident:	

Did you intervene in the incident, and if so how?	
Has the incident been reported to Parents/ Guardians and or a teacher? If so, please provide details	
Include date and time.	
Are there any follow up actions required on behalf of Concern?	
Any other relevant information:	
Has the incident been reported to any other agency / person – Please state details of this report i.e. to whom , date, time, and provide full their contact details.	
Concern Staff member signature and date and time form completed:	
Name of DLP or DDLP and contact Details	



# **Child Protection and Welfare Report Form**

# Use block letters when filling out this form. Fields marked with an \* are mandatory.

1. Tusla Area (	this is where the child resid	es)*					
2. Date of Rep	ort*						
3. Details of Cl	aild						
First Name*	iitu	Surna	mo*				
		Fema					
Male*	Ш						
Address*			of Birth*				
		Estim	ated Age*				
		Schoo	l Name				
		Schoo	l Address				
Eircode							
4. Details of concerns*  Please complete the following section with as much detail about the specific child protection or welfare concern or allegation as possible. Include dates, times, incident details and names of anyone who observed any incident. Please include the parents and child's view, if known. Please attach additional sheets, if necessary.  Please see 'Tusla Children First – A Guide for the Reporting of Child Protection and Welfare Concerns' for additional assistance on the steps to consider in making a report to Tusla							
5. Type of Concern							
Child Welfare	Concern						
Emotional Abu	ise		Physical Abu	ise			
Neglect			Sexual Abus	e			

#### 6. Details of Reporter

First Name		Surna	ame						
Address If reportin	g	Orgai	nisati	on					
in a professional capacity, please use	2	Posit	ion H	eld					
your professional		Mobi	e No.	,					
address		Telep	hone	No.					
Eircode		Emai	l Add	ress					
Is this a Mandate Act 2015?*	d Report made under Sec 14, Childr	en First	Y	'es			No		
Mandated Person	's Type								
7. Details of Other	Persons Where a Joint Report is Be	ing Made							
First Name		Surna	me						
Address If reporting	5	Organ	isatio	on					
in a professional capacity, please use		Positi	on He	eld					
your professional address		Mobil	e No.						
address		Telep	hone	No.					
Eircode		Email	Addr	ess					
First Name		Surna	me						
Address If reporting in a professional	5	Organ	isatio	on					
capacity, please use		Positi	on He	eld					
your professional address		Mobil	e No.						
444,666		Telep	hone	No.					
Eircode		Email	Addı	ress					
8. Parents Aware o	of Report								
	rents/carers aware that this eported to Tusla?*	Yes					No		
If the parent/care reasons:	r does not know, please indicate								
9. Relationships									
<b>Details of Mother</b>									
First Name		Surnam	е						
Address		Mobile I	No.						
		Telepho	ne No	0.					
		Email A	ddres	SS					
Eircode									
Is the Mother a Le	gal Guardian?*	Yes		Γ			No		

Details of Father	<u> </u>						
First Name			Surname				
Address			Mobile No.				
			Telephone No.				
			Email Address				
Eircode							
						. 1	
Is the Father a L	egal Guardian?	*	Yes		N	lo	
10. Household Co	omposition						
First Name	Surname	Relationship	Date of Birth	Estimate	d Age	Addition Information e.g. scoccupa	nation
11. Details of Per	rson(s) Allegedi	v Causing Harm					
First Name*	Jon(3) Attegedt	y causing nam	Surname*				
Male*			Female*				
Address			Date of Birth				
			Estimated Age	•			
			Mobile No.				
			Telephone No.				
Eircode			Email Address	;			
Occupation			Organisation				
Position Held							
Relationship to Child							
Address at time							
If name unknown please indicate reason							

First Name*				Surname*		
Male*				Female*		
Address				Date of Birth		
				Estimated Age		
				Mobile No.		
				Telephone No.		
Eircode				Email Address		
Occupation				Organisation		
Position Held						
Relationship to Ch						
Address at time of						
If name unknown	please indicate reaso	on				
12. Name and Addı Previously with the	ress of Other Organis Family	ation	s, Person	nel or Agencies Kn	own to be Invo	olved Currently or
Profession	First Name	Surr	name	Address	Contact Number	Recent Contact e.g. 3/6/9 months ago
Social Worker						
Public Health Nurs	е					
GP						
Hospital						
School						
Gardaí						
Pre-school/ crèche						
Other						
13. Any Other Rela	evant Information, In	clud	ing any Pi	revious Contact wi	th the Child or	Family

Please ensure you have indicated if this is a mandated report in section 6.

Thank you for completing the report form.

In completing this report form you are providing details on yourself and on others. Details such as name, address and date of birth fall under the definition of 'Personal Data' in the Data Protection Acts, 1988 & 2003. Tusla has a responsibility under these Acts in its capacity as a Data Controller to, amongst other things, obtain and process this data fairly; keep it safe and secure; and to keep it for a specified lawful purpose. That purpose is to fulfil our statutory responsibility under the Child Care Act 1991 to promote the protection and welfare of children. Tusla may, during the course of the assessment of this report disclose such Personal Data to other agencies including An Garda Síochána. Further details about Tusla's responsibilities as a Data Controller and your rights as a Data Subject can be found on our website, www. tusla.ie. As you are providing Personal Data on others, you are a Data Processor. We ask that you only provide those details that are necessary for the report and that you keep this report and the Personal Data contained in it secure from unauthorised access, disclosure, destruction or accidental loss.

#### 14. For Completion by Tusla Authorised Person on Receipt of Report

Report Received by								
First Name	Surname		Date					
Mandated Report Ackno	owledgement by							
First Name	Surname		Date Sent					
Authorised Person Sign	ature*							
Date*								
Child Previously Known Yes No								
Allocated Case No								



## Contact Details for The Child & Family Agency (TUSLA) and An Garda Síochána

#### 1. TUSLA The Child and Family Agency

Concerns about a child will be reported to the Child and Family Agency in the first instance. Reports should be made to the local social work duty service in the area where the child lives.

Web: www.tusla.ie Phone: 01 7718500 Email: info@tusla.ie

Contact numbers for each county can be found at: www.tusla.ie/services/child-protection-welfare/contact-a-social-worker

#### 2. An Garda Síochána

Any serious concerns in relation to children out of hours should be reported immediately to An Garda Síochana. Contact details for Garda stations can be found at: http://www.garda.ie/Stations/Default.aspx

In the event of an emergency where a child is in immediate danger, An Garda Síochána can be reached at 999 or 112



## **Zoom Guidelines for Employees when running** an **AC** event

## Running Sessions over Zoom with Under 18s

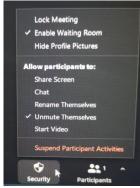
- Familiarise yourself with the Zoom Security settings in advance of the session starting and then once the zoom session has started check the options available are correct
- If some options are missing, go to the zoom settings on the website
- In some cases, settings need to be established before the meeting link has been sent
- Registration links should be used for sessions where appropriate

# In the first image below all settings are enabled we must edit these before a session begins

Default Settings





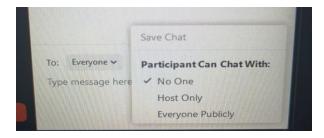


## General Settings to be used on Zoom Sessions

- · A Waiting Room must be used
- Allow Participants to unmute themselves
- Only allow Screen Share at Specific Times e.g. during presentations etc.



- · Don't allow renaming unless required
- Only Allow chat at specific times, otherwise chat should be set to host only See below:



#### **Checking Attendance**

 Tick off attendance while the attendees are in the waiting room where possible and admit once their name is ticked off the list

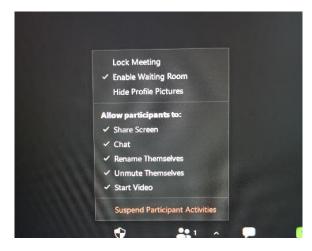
## Unsure of Identity/Incorrect naming of Zoom Account

- If unsure of a person's identity keep them in the waiting room
- It's possible to send the waiting room a message
- You can allow a person into the session if you think there is a low risk if they are incorrectly named but they must be messaged immediately once they enter the zoom session and asked to identify themselves. They should be ejected from the session if not part of it.
- In this case, an incident report form should be completed.

#### Once a Session has begun

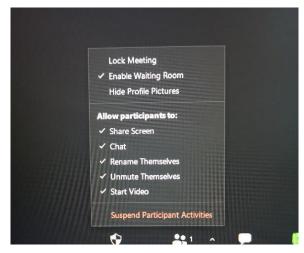
• Lock the Session (In Security Settings)

## Inappropriate behaviour on camera/audio



- Suspend Participants Activities (in red)
- Message the person who has committed the offence saying they are in violation of the code of conduct and you will eject them from the session as a result
- Eject from the session or place in meeting room (if it's an option)
- Once ejected from the session follow up with parent/guardian details of the incident
- Fill in Incident report form in the child safeguarding policy

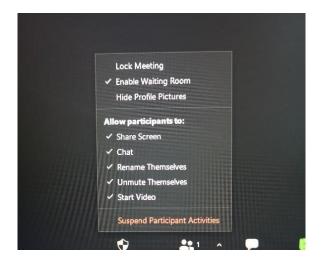
#### **Inappropriate chat**



- Disable Chat by unticking the CHAT option
- Is possible take a screenshot of the chat that was written/or download the chat afterwards

- Send message to that person saying that they will be either ejected/placed in the waiting room
- Place in the waiting room/eject.
- Follow up with call/email to the parent/ guardian detailing the incident
- Fill in incident form in the Children Safeguarding procedures and follow the enclosed procedures.

## Displays an inappropriate image on screen



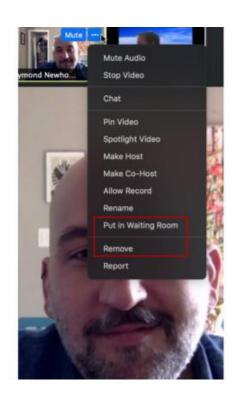
- Disable Screen Share by unticking the *Share Screen* option
- Is possible take a screenshot of the chat that was written/or download the chat afterwards
- Send message to that person saying that they will be either ejected/placed in the waiting room
- Place in the waiting room/eject.
- Follow up with call/email to the parent/ guardian detailing the incident
- Fill in incident form in the Children Safeguarding procedures and follow the enclosed procedures.

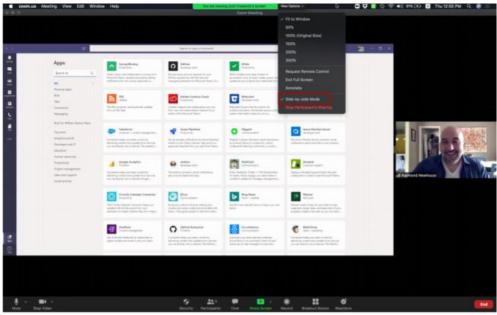
#### **Zoom Bombing**

- Eject Immediately Remove Participant Option (See image below)
- Fill in incident form in the Children Safeguarding procedures and follow the enclosed procedures.
- Follow up with call/email to the parent/guardians and teachers detailing the incident
- Anyone found to be sharing links will be ejected from TY Academy and not allowed to attend future AC events

#### **Sharing the Wrong Screen**

- If an approved presenter shares the wrong screen you can stop the share
- Click 'View Options' at the top of the Screen Share screen
- Select 'Stop Participants Sharing' (will be in red writing)







# Checklist for Employees Facilitating a Talk or Workshop on School/ Youth Centre Premises with teacher/ youth worker present

School	oi/ Youth Centre:		
Staff	Member:		
Date:		<del></del>	
		ed between organisations working in partnership about which to commencing work with children.	
1.	Both/all parties shared their ch	ld safeguarding statements and risk assessment.	
	Yes	□ No	
2.	Is it agreed the guiding principly youth centre.	es and child safeguarding procedures will be that of the hosting scho	00
	Yes	No	
3.	Is the Designated Liaison Person	n (DLP) named and agreed?	
	Yes	□ No	
4.	Is the role of the DLP clearly ou	tlined?	
	Yes	□ No	
5.	Are mandated persons identified	d and their responsibilities understood by both organisations?	
	Yes	□ No	
6.		een agreed for information sharing between DLPs of both organisation decisions to report or not report and the recording of all child protect	
	Yes	No	
7.	Have you agreed how you will i procedures?	nplement and operate your guiding principles and child safeguarding	g
	Yes	No	



# Checklist for Employees Facilitating an online Talk or Workshop with teacher(s)/ youth worker(s) on the call

Scno	oi/ Youth Centre:	
Staff	Member:	
Date:	<u></u>	
	essential that agreement is reached betw guarding framework applies prior to comr	een organisations working in partnership about which nencing work with children.
1.	Concern staff member has followed zoo settings for call	om guidelines (see appendix nine) when setting up security
	Yes	No
2.		guarding statements and risk assessment.
	Yes	∐ No
3.	Is it agreed the guiding principles and c youth centre.	hild safeguarding procedures will be that of the hosting school/
	Yes	No
4.	Is the Designated Liaison Person (DLP)	
	Yes	∐ No
5.	Is the role of the DLP clearly outlined?  Yes	□No
	1 163	
6.	Are mandated persons identified and the	neir responsibilities understood by both organisations?
7.		eed for information sharing between DLPs of both organisations ons to report or not report and the recording of all child
	Yes	No
8.	Have you agreed how you will impleme procedures?	nt and operate your guiding principles and child safeguarding
	Yes	No



## **Checklist for Employees Facilitating a Talk** or Workshop in External Venue

#### Child protection checklist for Global Citizenship projects and events

The following checklist must be completed in the planning stages of any project or event involving children under the age of 18. If a question is not applicable to a particular event please write n/a.

Please fill in before each engagement and save in the relevant SharePoint folder.

#### Applicable events:

- World Day Workshops
- Debates Workshops (external)
- Campaign Academy
- TY Academy
- Project Us / 1Planet events (If under 18's attending)
- Quarter, semi and final debates

Before the engagement - Communication	Checklist- Tick if completed or add details
Permission has been sought from parents/guardians (using a consent form) for attendance and for images.	
Consent forms have been saved in the relevant folder in SharePoint and details added to any relevant excel sheet	
Any hard copies of consent forms are scanned in and shredded afterwards.	
Schools/parents or guardians have been sent an online link to the Child Safeguarding Document, Safe Guarding Statement and Risk Assessment.	
Behavior expectations have been communicated to participants or to teacher (see paragraph below)	
Expectations for young people and key information for parents/guardians and schools:	
We want everyone to enjoyable and safe experience at XXX so we expect participants to treat one another with respect and follow the instructions of staff.	
We have a zero tolerance policy on behaviour such as bullying, intimidation, harassment, discrimination or behaviour that brings Concern into disrepute. If you do not follow these rules of conduct, we reserve the right to ask you to leave the programme.	
Please also find a copy of our child safeguarding statement here: Safeguarding   Concern Worldwide and a copy of our safeguarding guidelines here.	

Planning considerations	Checklist- Tick if completed or add details
One of the members of staff present is First Aid trained.	
There is a First Aid kit on the premises.	
The venue has a Health and Safety Policy/Public Liability Insurance in place or I have contacted Concern's corporate services to add the engagement to the policy.	
All staff involved are Garda Vetted (if not, please provide details).	
A member of the Global Citizenship Team will be present with students during activities (except for agreed unsupervised lunch when parents/guardians have consented).	
Other GC staff, external facilitators, other Concern staff and visitors briefed before the event.	
All staff involved are aware of the role(s) that they have on the day	
I have a plan for social media content for the engagement as agreed with the GC Digital Content Editor	
I have a copy of parent/guardian contact details printed out in hard copy for easy access if needed	
I have considered and aware of the access, dietary and medical needs of students so that they can participate fully	

At the engagement:	Checklist- Tick if completed or add details
Participants signed in and received a name badge indicating photo consents.	
Any late comers were noted on the sign in sheet and parents/guardians and teachers contacted if 15 minutes or more late.	
I mentioned health and safety procedures.	
We created a group agreement and discussed accepted behaviors.	
I explained how students can make a complaint and created a safe space so students could approach staff if there was a problem.	
We asked students if we could take their photograph.	

Post event:	Checklist- Tick if completed or add details
I have logged any incidents	
I have discussed with my manager/team how the day went and reflected on any improvements to ensure participants got the best experience from the engagement	
I followed up with the teacher to check in on how the students found the day	

Appendix 13

# **Child protection checklist for Online Global Citizenship projects and events**

EVENT:	DATE:
Checklist	Checklist - Tick if completed / Add relevant information
Online Platform  Online platform set up in line with GC security settings for youth event	
• Who is the focal person/ persons (lead) for this event? • List of other Global Citizenship staff attending	
<ul> <li>Staff and volunteers:</li> <li>Are all staff and volunteers involved Garda Vetted?</li> <li>If not give details: (e.g. a staff member from another department who attends an event on a one-off basis and does not have unsupervised access to children)</li> </ul>	
Permission:  Permission must be sought from parents/guardian for their child's involvement in any event taking place externally to the child's school premises. Consent forms must be saved in relevant folder of your programme. Forms should be deleted in July of academic year (keep relevant consent forms for images)  Schools will be sent an online link to the Child Safe Guarding Document, Safe Guarding Statement and Risk Assessment	
<ul> <li>Application form/ Invite to event:</li> <li>Have you considered special needs/access issues and spoken to a teacher/parent/guardian or youth worker about this?</li> <li>Have you mentioned how participants can contact Concern if having difficulties logging on to online call/event?</li> <li>Have you mentioned use of photos taken at the event on the application form?</li> </ul>	

to you?

#### Photos and video: • Has permission been sought from the school/parents to use photos/video on web/in publications? • Photos are to be stored on storydesk. Have you noted and saved the relevant consent forms to be saved for three years? • Photos needed: One group shot. One close up of small group of students with branding or 'working shot'. • Do not identify students- simply name 'Participants in Campaign Academy 2018/19' Social media: • Will social media be used at/during the event/ project? • Are all staff and volunteers aware of Concern's social media policy regarding minors? (i.e consent must be given from parent/guardian) At the event: Three key slides - how to use platform, behavior and complaints process 1. Did you get participants to sign in? 2. Did you note any latecomers/early leavers? 3. Do you have the list of participants securely held in a folder or safe mechanism? 4. Did you mention behavior expected of all participants in the event? 5. Did you mention use of photographs taken at the event? 6. Did you explain how participants are to <u>use/engage</u> with online platform (I.e zoom or teams)? 7. Did you mention Complaints Process? Post event: • Have you logged any accidents/incidents? • Have you logged any complaints made directly to you and informed line manager? • Have you logged any positive feedback made directly



#### **Sample Consent Form**

#### **STUDENT EVENT: Student Consent form (sample)**

This form is to be signed by a parent/guardian and school of any child under 18 who is attending an event organised by the Global Citizenship team. This form must be completed and signed by the parent/guardian.

Important information:

- Events run from X to X on their designated days.
- Please note, snacks maybe provided but lunch isn't.
- If you do not give permission for the young person to leave the location, then they must bring a packed lunch

Please contact the school's team on <u>schools@concern.net</u> if you have any questions about the form or the activity.

#### 1. Young person's details:

*Student name			
*School			
*Please tick to indicate wh	ich event the young perso	n is attending:	
[Insert date and loca	ution]		
[Insert date and loca	ution]		
[Insert date and loca	ution]		
[Insert date and loca	ution]		
2. Parent/guardian details	5:		
*Name of parent/guardian			
*Emergency Contact Numb	per		
Contact Email Address			
	·		

#### 3. Information we need to know

This information is to ensure that the week is safe as safe and inclusive as possible for all students

*Are there any medical conditions that we need to be aware of?	
*Are there any additional education needs that we need to be aware of?	
*Are there any access requirements that we need to put in place?	
*Core Purpose (please tick to indic	ate consent):
	amed above has permission to the indicated event(s) above
	sion for them to leave the event during lunch time to get lunch off site (a e brought with the young person if no consent given)
	sion for Concern to use photographs/video footage of my child taken at the ial media or schools resources produced by the Active Citizenship team
I give permission for the stu	dent named above to receive Concern Active's Youth E-Newsletter
If yes, please provide student <b>and</b> p	arental email for newsletter:
Note: We cannot take photos or vid below) – this is a legal requirement	eos of the named young person if you do not consent (even if they do
4. *For the young person to com	plete
I agree to:	
Attend and take part in the	indicated event(s)
Concern keeping a record of the activity	of this form, so they have the information they need to keep me safe during
Receiving the Concern You	h E-Newsletter
	ned during the activity. I understand that the photographs or film might be bout what Concern does. (We will always ask on the day before we take cline then too)
I understand that enjoying safety rules.	the activity and being safe means, I need to follow the behaviour code and
Note: We take your consent serious we will take it as a no unless you co	sly - even if your parent has given permission for photos or the newsletter, ensent too.
Cianad Bananta	Cidenal construction

Signed young person: Signed Parent:

Concern processes this personal data for the specific purposes described and based on the student's and parent's/guardian's consent which can be withdrawn at any time without affecting Concern's use prior to that withdrawal. For more information on Concern's commitment to data protection, your rights and contact information, please visit our privacy policy at <u>www.concern.net/about/privacy</u>



