

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.: 01</b>	<b>Page 1 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

**Shannon Foynes Port Company  
Child Safeguarding Policy  
&  
Guidelines for Staff**

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.: 01</b>	<b>Page 2 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

## Table of Contents

1.	Introduction: .....	4
1.1	General.....	4
1.2	Definitions & Acronyms .....	4
1.3	Standard Operations at SFPC .....	4
1.4	Scope & Commitment .....	5
2.	SFPC Child Safeguarding Policy Statement .....	6
3.	Role of the School & Student.....	6
3.1	School Roles & Responsibilities.....	6
3.2	Student Roles & Responsibilities.....	7
4.	Operational Activities, Hazards & Risks .....	7
4.1	Overview of Activities within the Port .....	7
4.2	Hazards & Risks within the Port .....	7
4.3	Event Risk Assessments.....	8
5.	Authorised Access to Port Facilities .....	8
5.1	Planned Group Educational Events .....	8
5.2	Student Work Placement .....	9
6.	Group Event Application Form.....	9
7.	Student Placement Application Form .....	10
Appendix 1:	SFPC Code of Behaviour in relation to Child Protection.....	12
A1.1	Good Practice Guidelines for SFPC staff:.....	12
A1.2	Protect and Promote Children's rights:.....	13
A1.3	Inappropriate Behaviour – Checklist for Staff .....	13
A1.4	Health and Safety at SFPC Facilities: .....	13
A1.5	Reporting Child Abuse - Procedure:.....	13
Appendix 2:	Role of Liaison Persons & Officers.....	14
A2.1	The Designated Liaison Person (DLP):.....	14
A2.2	SFPC Child Liaison Officer (CLO): .....	15
A2.3	Steps to be taken by Staff Member/s who are aware of and/or suspect child abuse: .....	15
A2.4	Steps to be taken by the Designated Liaison Person: .....	16
A2.5	Cases not reported to the HSE or An Garda Síochána: .....	16
A2.6	An Allegation of Abuse against a Staff Member: .....	16
Appendix 3:	Training.....	16
Appendix 4:	Group Visitor Approval Process.....	17
Appendix 5:	Work Placement Approval Process .....	18
Appendix 6:	Guidance for Student Work Placement.....	19
Appendix 7:	Community Festivals and Other Externally Organised Events .....	20
Appendix 8:	Recognising Child Neglect or Abuse .....	20
Appendix 9:	Procedures for Dealing with Lost/ Missing Children .....	21

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 3 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

Appendix 10:	Reasonable Grounds for Concern.....	22
Appendix 11:	Allegation of Abuse .....	22
Appendix 12:	Protection for Persons Reporting Child Abuse.....	23

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	Page <b>4</b> of <b>24</b>
<b>Issue Date:</b> 06.02.2018	<b>Written by:</b> M Geoghegan	<b>Approved by:</b> P Keating	

## 1. Introduction:

### 1.1 General

Consistent with the principles of Children First Act 2015 and Children First National Guidance for the Protection and Welfare of Children (Department of Children and Youth Affairs 2011), every organisation, both public and private, that is providing services for children, or that is in regular direct contact with children should develop guidance and procedures for staff who have reasonable grounds for concern about the safety and welfare of children involved with the organisation.

Organisations falling within scope include those whose employees and/or volunteers have access to children, or work directly with children, and where a child can attend without a parent or guardian will come under the proposed Children First legislation.

The underlying purpose of the legislation is to ensure that children are protected while present at, or availing of the services of, an organisation falling within its scope.

### 1.2 Definitions & Acronyms

<b>SFPC</b>	Shannon Foynes Port Company
<b>Child/young person</b>	For the purposes of this policy a child/young person means a person under the age of 18 years, excluding a person who is or has been married.
<b>CEO</b>	Chief Executive Officer
<b>DM</b>	Department Manager
<b>DLP</b>	Designated Liaison Person (In accordance with Children First: National Guidance)
<b>CLO</b>	Child Liaison Officer (In accordance with SFPC Internal appointment)
<b>EAS</b>	External Adult Supervision represents the number of adult persons external to SFPC i.e. school teachers, carers etc. to be present with the child/children at all times during an event
<b>IAS</b>	Internal Adult Supervision represents the number of adult persons internal and under the control of SFPC i.e. employees etc. to be present with the child/children at all times during the event

### 1.3 Standard Operations at SFPC

Standard operations at Shannon Foynes Port Company (SFPC) facilities do not include the provision of services directly to children. However in line with our commitment to corporate and social responsibility SFPC will in so far as is reasonable facilitate events where children may gain access to the port:

Access to SFPC premises is subject to consent from SFPC Management. Access may be permitted as part of "planned" events where such may include the presence of children either visiting as part of a planned educational group or as part of a larger organised social event.

Second level students (particularly transition year) and/or schools may on occasion apply to SFPC requesting an opportunity to attend work placement. Such work placement programs will normally afford the student the opportunity to gain work experience necessary as part of a chosen educational program etc.

Due to the nature, complexity and risks associated with operational activities within the port SFPC shall limit the number of events to be authorised in a calendar year.

The following table applies to the number of events to be authorised in a calendar year:

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.: 01</b>	<b>Page 5 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	
<b>Event</b>	<b>Max Number of Events Per Year</b>	<b>Max Number of Days Per Event</b>	<b>Max Number of Children Per Event</b>
<b>Group visit</b>	4	1	25
<b>Student placement</b>	4	5	1

#### **1.4 Scope & Commitment**

Consistent with the statutory duties imposed on organisations SFPC has adopted this Child Safeguarding Policy to underpin its commitment to the safety and welfare of children and young people who enter our premises.

This Child Safeguarding Policy applies to all SFPC staff. Unless otherwise stated, reference to staff includes the following:

- Staff employed directly by SFPC on permanent, fixed term and casual contracts,
- Staff employed by contractors or through a contract or agency arrangement who provide a service to SFPC,
- Self-employed or freelance staff,
- Volunteers.

Service providers to SFPC whose employees or volunteers may on occasion have to deal with children without a parent or guardian present will be advised of SFPCs Child Safeguarding Policy and be required to meet the policy requirements as part of contract terms and conditions.

Periodically SFPC may evaluate this Policy taking into account such items as feedback received and/or any changing legislation over that period and amend accordingly

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page</b> 6 of 24
<b>Issue Date:</b> 06.02.2018	<b>Written by:</b> M Geoghegan	<b>Approved by:</b> P Keating	

## 2. SFPC Child Safeguarding Policy Statement

Shannon Foynes Port Company is committed to a child-centred approach to our work with children. We undertake to provide a safe environment where the welfare of the child is paramount. As SFPC are committed to the following:

- A child-centred approach in any of its activities associated with children and young people. While ultimately, the primary responsibility for a child or young person's welfare rests with the primary carer, SFPC will ensure, in so far as is reasonably practicable, that children who interact with SFPC are safe and protected from harm.
- We will undertake to provide a safe environment where the welfare of the child is paramount. To achieve this, the relevant SFPC liaison officers will ensure appropriate planning is carried out and approved prior to any event involving the presence of children proceeding within the port.
- We will adhere to any associated statutory requirement under the Children's First Act 2015 and the recommendations of Children First: National Guidance for the Protection and Welfare of Children and the accompanying Child Protection and Welfare Practice Handbook published by the Department of Children and Youth Affairs.
- We will refer any child protection and welfare issue to the appropriate agencies. In particular, if SFPC encounters or has concerns or suspects abuse of a child or young person it will report these concerns to the Health Services Executive (HSE) and/or An Garda Síochána.
- Valuing children means valuing staff as well; insisting on safe practices, eliminating the necessity for staff to take risks and providing them with support will make for a healthier and safer organisation.
- Where required we will implement Garda Vetting for relevant employees and/or volunteers.

SFPC wishes to support and protect its staff, and the guidelines in this policy will ensure that there is no doubt about responsibilities, obligations and standards.

In addition this Child Safeguarding Policy will be made available to all staff through its intranet service. SFPC Management will ensure users of Port Facilities and services are communicated key elements of this policy.

### **Pat Keating**

Chief Executive Officer  
Shannon Foynes Port Company

## 3. Role of the School & Student

### 3.1 School Roles & Responsibilities

SFPC will liaise with the school in relation to fulfilling the application to provide the necessary work placement. As such the school will:

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 7 of 24</b>
<b>Issue Date:</b> 06.02.2018	<b>Written by:</b> M Geoghegan	<b>Approved by:</b> P Keating	

- Assess the suitability of students to partake in each placement.
- Ensure the work placement is suitable for the student in question and be satisfied that the student will not be exposed to foreseeable risks of injury or harm.
- Name a person who acts as the school's contact in supervising and coordinating the work placements.
- In advance of the work placement, brief students on:
  - the aims of the work placement
  - his/her responsibilities while on work placement
  - acceptable standards of behaviour
  - the types of activities he/she is not to partake in
  - the procedures to follow should he/she have any difficulties while on work placement
  - disciplinary procedures
- Define the learning outcomes of the placement in terms of knowledge, skills and competencies to be acquired and where necessary provide SFPC with information on objectives and requirements set for the placement.
- Ensure that action is taken immediately if a complaint has been made by SFPC or the student.
- Inform SFPC of any medical conditions which may affect the safety and health of the student while on work placement.
- Provide SFPC with emergency contact details.

### 3.2 Student Roles & Responsibilities

- Abide by the rules and regulations of SFPC, its normal working hours, code of conduct and rules of confidentiality, etc.
- Take care of your own safety and health, and that of others who may be affected by your actions.
- Ensure all relevant forms are completed in consultation with the school and SFPC.
- Not to partake in any activities that require specialist training and/or SFPC authorisation.
- Following instruction, use any safety equipment that has been provided and take part in relevant training.
- Raise any safety and health concerns with SFPC and school contact person and inform them about any accidents or illness which you think may be work related.

## 4. Operational Activities, Hazards & Risks

### 4.1 Overview of Activities within the Port

Shannon Foynes Port Company, Ireland's second largest port operation, has statutory jurisdiction over all marine activities on a 500km<sup>2</sup> area on the Shannon Estuary, stretching from Kerry/Loop Heads to Limerick City. The strategic location of our terminals offers access to the vibrant economy and population of a large part of Ireland.

The company provides a variety of services, from controlling navigation and marine safety, to warehousing, logistics and cargo handling. We handle the largest vessels entering Irish waters, up to 200,000 dwt, and have a track record of continuous growth and innovation. All our operations are accredited to international standards.

SFPC specialises in bulk cargoes, which constitute more than half the cargoes transiting Irish ports. SFPC accounts for more than 35% of all bulk cargoes in the Republic (CSO 2010). Typical cargoes include liquid fuels and chemicals, ores, coal and other energy products, agri-business inputs such as animal feedstuffs and fertilisers, recyclable materials and various project cargoes, including wind turbines for wind energy projects.

### 4.2 Hazards & Risks within the Port

The below is a non-exhaustive list of hazards and risks present within the port environment on a daily basis. SFPC will ensure that for any event the health and safety of the child will be the primary objective and therefore authorised access to certain areas or activities may be limited and/or restricted.

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 8 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

Non-exhaustive list of hazards and risks present within the port environment

- Slips, Trips
- Fall of Person From Height
- Fall of Material From Height
- Workplace Transport, high volume of HGV movement
- Working over or near water
- Work at Height
- Lifting Operations or lifting of materials overhead
- Ship/Shore Access
- Manual Handling
- Work in Ships' Holds
- Hazardous Cargoes
- Hazardous Atmosphere
- Confined Spaces
- Mooring Operations
- Cargo Handling Equipment,
- Housekeeping
- Vibration
- Dust
- Noise
- Lighting
- Weather, Wind and Tide
- Release of a Dangerous Substance

#### **4.3 Event Risk Assessments**

SFPC will as part of every planned event and/or student work placement ensure a written assessment is completed identifying risk of 'harm' to a child while availing of the service. This risk assessment will be incorporated into an event and/or work placement plan taking into consideration the proposed duration of the visit, planned activities and proposed locations to visit and the number of staff members required to comply with this policy. The CLO will retain copies of event / work placement plans and any associated documentation deemed necessary to support compliance with this policy.

## **5. Authorised Access to Port Facilities**

### **5.1 Planned Group Educational Events**

SFPC support and promote planned group educational events where children can view operational activities of the port in a safe and controlled manner. During these visits the primary responsibility for the welfare of children visiting SFPC rests with the parents, carers, group leaders and / or teachers.

In all cases planned visits which will on occasion include the presence of children must be approved by SFPC prior to any visit taking place. In this case the group visitor approval process must be complied with.

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 9 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

SFPC requires Primary Carers to ensure that they, and all children and young people in their care, meet standards of good conduct and behaviour and are courteous and cooperative while on SFPC premises.

Primary carers of children/young people are required to remain with their child/children/group at all times while on site.

SFPC is committed to being open with primary carers and undertakes to:

- Make our Child Safeguarding Policy available to primary carers;
- Make primary carers and schools aware of the type of activities, if any, that young people can participate in at SFPC sites;
- Comply with SFPC Environmental, Health and Safety practices;
- Advise primary carers of their responsibilities regarding the supervision of children/young people visiting SFPC facilities under their care.

Due to the nature, complexity and risks associated with operational activities within the port SFPC shall limit the number of events to be authorised in a calendar year. The following table applies to group events:

Event	Max Number of Events Per Year	Max Number of Days Per Event	Max Number of Children Per Event	Min Number of EAS Per Event	Min Number of IAS Per Event
Group Visit	4	1	25	2	1

## 5.2 Student Work Placement

SFPC recognise that work placements provide students with valuable experience of the work environment and help students gain practical experience to assist with their career choices. Work placements are most often the first time that many students experience the work environment and good preparation and organisation of placements is essential if these opportunities are to be rewarding and safe. This policy will provide guidance when preparing for work placement programmes to ensure the necessary risk management controls are in place.

Due to the nature, complexity and risks associated with operational activities within the port SFPC shall limit the number of student placements to be authorised in a calendar year. The following table applies to student placements:

Event	Max Number of placements Per Year	Max Number of Days Per placement	Max Number of Children Per placement	Min Number of EAS Per placement	Min Number of IAS Per placement
Student Placement	4	5	1	0	1/2*

\* **Note:** In so far as is reasonable a student will not be supervised by one adult however SFPC accept that there will be occasions where the SFPC CLO may be the sole adult supervisor present.

## 6. Group Event Application Form

Sections A, B to be completed by the school and completed version forwarded to SFPC.

Section C then to be completed by SFPC and returned to the school contact person directly.

SFPC will retain a completed version for records.

A. School Details	
<b>School Name:</b>	

SFPC POLICY		Child Safeguarding Policy & Guidelines	
Doc No. : PRO35		Rev No.: 01	Page 10 of 24
Issue Date: 06.02.2018	Written by: M Geoghegan	Approved by: P Keating	

School Address:			
General Contact Details for School:		Point of Contact for SFPC Child Liaison Officer:	
Phone:	Email:	Phone:	Email:
Designated Liaison Person: (tick here <input type="checkbox"/> if same as point of contact otherwise enter details below)		Deputy Designated Liaison Person:	
Phone:	Email:	Phone:	Email:

#### B. Visiting Party Details

Does the school have an up to date Child Safeguarding Policy compliant with Children First legislation and guidance (If yes copy to be included when returning this form to SFPC)		Yes <input type="checkbox"/>	No <input type="checkbox"/>
Confirm the estimated number of students proposed to attend visit:			
Name the External Adult Supervisor/s who will attend on the date of the visit:			
EAS 1:		EAS 2:	
Note any special needs SFPC should be aware of:			
Preferred arrival time:		Preferred departure time:	
For promotional purposes only SFPC may on occasion publish pictures and/or photos taken during events on company newsletters, company website etc. Please confirm if the school and primary carer approve the publication of such data.			Yes <input type="checkbox"/>
			No <input type="checkbox"/>

#### C. Shannon Foynes Port Company

Confirm date/s & time/s suitable to facilitate visit:	
Confirm if number of External Adult Supervision/s is sufficient to supervise during the visit:	
Where required confirm how SFPC will facilitate any special needs:	
Agreed arrival time:	Agreed departure time:

### 7. Student Placement Application Form

Sections A, B and C to be completed by the school, in consultation with the student and a completed version forwarded to SFPC.

Section D then to be completed by SFPC and returned to the school contact person directly or via the student. SFPC will retain a completed version for records.

A. Students Details	B. Parent/Guardian Details
Name:	Name:
Address:	Address:

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 11 of 24</b>
<b>Issue Date:</b> 06.02.2018	<b>Written by:</b> M Geoghegan	<b>Approved by:</b> P Keating	
<b>Parent / Guardian mobile contact number:</b>			
<b>Are there any medical and/or special conditions we should be aware of? Yes <input type="checkbox"/> No <input type="checkbox"/></b>			
<b>If yes please provide details:</b>			

<b>C. School Details</b>			
<b>School Name:</b>			
<b>School Address:</b>			
<b>General Contact Details for School:</b>		<b>Point of Contact for SFPC Child Liaison Officer:</b>	
Phone:	Email:	Phone:	Email:
<b>Designated Liaison Person:</b> (tick here <input type="checkbox"/> if same as point of contact otherwise enter details below)		<b>Deputy Designated Liaison Person:</b>	
Phone:	Email:	Phone:	Email:
<b>For promotional purposes only SFPC may on occasion publish pictures and/or photos taken during events on company newsletters, company website etc. Please confirm if the school and primary carer approve the publication of such data.</b>			<b>Yes <input type="checkbox"/> No <input type="checkbox"/></b>

<b>D. Shannon Foynes Port Company</b>	
<b>Placement program:</b>	
<b>Type of work Placement (TY, other etc.)</b>	<b>Hours of Work:</b>
<b>Description of tasks to be performed:</b>	

SFPC POLICY		Child Safeguarding Policy & Guidelines	
Doc No. : PRO35		Rev No.: 01	Page 12 of 24
Issue Date: 06.02.2018	Written by: M Geoghegan	Approved by: P Keating	

# SFPC Child Safeguarding Guidelines for Staff

## Appendix 1: SFPC Code of Behaviour in relation to Child Protection

The SFPC Child Safeguarding Policy aims to create an environment in which,

- Primary carers are aware of their responsibilities;
- Children are listened to and kept safe at all times;
- Staff potentially in contact with children and young people are informed, supported and protected.

In order to meet these aims, SFPC will follow a framework for good practice and code of behaviour as set out in this section.

### **A1.1 Good Practice Guidelines for SFPC staff:**

- Ensure primary carers, guides and others working with children and young people on SFPC premises are aware of, and accept, the SFPC Child Safeguarding Policy and Procedures;
- Ensure that primary carers, guides and others provide and maintain appropriate supervision of children in their care at all times;
- Ensure that staff are made aware of the possible signs of child abuse;
- Ensure that a ratio of at least 1 primary carer for every 20 children visiting SFPC Facilities is strictly adhered to;

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	Page <b>13</b> of <b>24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

- Be inclusive and provide appropriate resources to cater for children and young people with special needs;
- Report any concerns to the SFPC appointed Liaison Officer ensuring reporting procedures are followed;
- Enable children and young people to report any bullying, concerns or worries;
- Observe appropriate dress and behaviour;
- Provide appropriate guidelines for staff;
- Follow procedures for dealing with lost/ found children;
- If images of children are to be displayed, primary carers, parents and/or guardians must be informed and provide approval beforehand;
- Inform primary carers of any issues that concern children in their care;
- Respond promptly to concerns;
- Maintain awareness of child protection issues when engaging with children and young people in particular, around language used and comments made

#### **A1.2 Protect and Promote Children's rights:**

- Treat all children and young people with dignity, sensitivity and respect;
- Make sure that children know SFPC s rules about behaviour;
- Help children to be safe, happy while on site;
- Never favouring one child or children over others;
- Provide written information about SFPC Child Safeguarding Policy to primary carers who in turn will communicate to children / young person's;
- Know about the principles and practices of child protection including their legal duties;
- Never engaging in sexually provocative games or make suggestive comments, even in fun;
- Respect children's privacy in bathrooms or changing rooms;
- Always responding to complaints or allegations;
- Be sensitive to the fact that some children are more vulnerable and have special needs.

#### **A1.3 Inappropriate Behaviour – Checklist for Staff**

- Never hit or physically punish a child or young person;
- Prevent / avoid time alone with a child/young person;
- Never single out a child for favouritism, unfair criticism, ridicule or unwelcome focus or attention;
- Never make physical contact with a child/young person (except in an emergency or dangerous situation);
- Never reveal personal information about a child in any way, subject to child protection concerns.

#### **A1.4 Health and Safety at SFPC Facilities:**

- Children / young person's accessing SFPC facilities will be authorised to do so prior to the visit date.
- In so far as is reasonably practicable SFPC provide a safe working environment for employees, staff and port users. Visiting groups must be aware of and adhere to controls associated with planned visits
- Children authorised to access SFPC facilities must not be unattended or unsupervised at any time. Primary carers will ensure SFPC health & safety rules are enforced while on site and at all times.
- SFPC sites have extensive health and safety guidelines, specific to each site. Visitors will make themselves and their groups aware of and follow accordingly health and safety guidelines which are communicated through signage and information boards placed throughout each site.
- All staff are expected to be aware of guidelines and procedures appropriate to their site and enforce the controls accordingly.

#### **A1.5 Reporting Child Abuse - Procedure:**

The guiding principles in regard to reporting child abuse may be summarised as follows:

- The safety and well-being of the child must take priority;
- Reports should be made without delay to the HSE Children and Family Services;
- The principle of natural justice should apply, which means that a person is innocent until proven otherwise;

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	Page <b>14</b> of <b>24</b>
<b>Issue Date:</b> 06.02.2018	<b>Written by:</b> M Geoghegan	<b>Approved by:</b> P Keating	

- The principle of confidentiality should apply, whereby only those that need to know should be told of a suspicion/allegation/disclosure of abuse and the number that need to be kept informed should be kept to a minimum.
- Any person who suspects that a child is being abused, or is at risk of abuse, has a responsibility and a duty of care to report their concerns to the Health Service Executive, either directly or through a nominated Designated Liaison Person.

## Appendix 2: Role of Liaison Persons & Officers

### A2.1 The Designated Liaison Person (DLP):

Children First: Legislation and National Guidance recommends that all organisations providing services directly to children should have a designated person to act as a liaison with outside organisations. Because SFPC do not provide services directly to children the following will apply:

The Designated Liaison Person for each visiting group and/or student work placement will:

- Be identified in writing to SFPC prior to visits taking place
- Act as a source of advice on child protection matters;
- Liaise with the HSE and An Garda Síochána and other agencies about suspected or actual cases of child abuse;
- Be accessible to relevant SFPC staff.

The event organiser i.e. school etc. will ensure the Designated Liaison Person is knowledgeable about child protection and that s/he is competent to undertake duties assigned as part of the role.

If the Designated Liaison person is not available then the Deputy Designated Liaison person should be identified and contact details made available to SFPC. The Deputy Designated Liaison Person will take over the responsibilities of the Designated Liaison Person where required.

**Please note:** SFPC may, at their discretion, request documented evidence of competence and training prior to the approval of any planned event, externally organised event and/or student work placement.

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 15 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

### **A2.2 SFPC Child Liaison Officer (CLO):**

SFPC will appoint a Child Liaison Officer to act as a liaison with outside organisations. In cases where planned visits to SFPC facilities are requested the statutory role of the Designated Liaison Person (DLP) will remain the responsibility of the visiting applicant and/or organisation i.e. school. Because SFPC do not provide services directly to children the following will apply:

The SFPC Child Liaison Officer will:

- Be selected, approved and appointed by SFPC Management.
- Be a source of support on the implementation of the SFPC Child Safeguarding Policy
- Liaise with outside organisations to co-ordinate and plan events where children apply to access port facilities
- Act as point of contact with Designated Liaison Person (DLP) of external organisations
- Inform the CEO & or a member of Management where suspected or actual cases of child abuse are reported
- Undergo Garda Vetting as is deemed necessary
- Be known and accessible to SFPC staff

The SFPC CLO shall ensure that s/he is knowledgeable about child protection and that s/he undertakes any training considered necessary to keep updated on new development.

### **A2.3 Steps to be taken by Staff Member/s who are aware of and/or suspect child abuse:**

The following procedure should be followed where reasonable grounds exist for the reporting of suspected or actual child abuse. Issues that would constitute 'reasonable grounds' are explained in Appendix 10 of this policy document.

- A staff member who has a child protection concern will bring the concern to the attention of the relevant SFPC Child Liaison Officer at the earliest opportunity.
- The CLO will in turn assume responsibility to inform the Designated Liaison Person and/or Deputy Designated Liaison Person identified as the point of contact for the child concerned.
- In addition the CLO will inform the SFPC Company Secretary who will notify the CEO. Where this person is unavailable the CLO will inform the CEO directly and/or a nominated member of Management deputising in their absence.
- In all cases the CLO will be the point of contact between SFPC & the associated Designated Liaison Person
- A staff member who knows or suspects that a young person has been or is at risk of being harmed has a duty to report the matter. This can be achieved by conveying this concern to the SFPC Child Liaison Officer. The matter may have to be reported to HSE Children and Family Services who in turn may notify An Garda Síochána. In an emergency, a report must be made directly to An Garda Síochána. The SFPC CLO will at all times keep the Company Secretary and/or CEO up to date with reports of this nature.
- If the suspected abuser is another staff member, the matter should be brought to the attention of the CLO. In this regard SFPC should be sensitive to the fact that those with a need to know should be restricted to a minimum.
- It is important that SFPC staff is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred. That is a task for the HSE and An Garda Síochána. Under no circumstances should any staff member attempt to deal with the problem of abuse alone.
- The staff member who initially expresses concern may be required to complete a report, in consultation with the relevant Designated Liaison Person associated with the case, outlining the situation, including the date, time and people involved.
- A concern about a potential risk to children posed by a specific person, even if the children are unidentifiable, should be communicated to the HSE Children and Family Services by the Designated Liaison Person. This can be facilitated through the SFPC CLO.
- Any reasonable suspicion must elicit a response. Ignoring signals or failing to intervene may result in ongoing or further harm to the child. The HSE has a statutory obligation to identify children who are

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 16 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

not receiving adequate care and protection, to provide family support services and, where necessary, to take children into the care of the HSE.

- Staff who report concerns to the HSE are assured that they will not automatically trigger inappropriate child protection investigations. It is also important to note that staff that report concerns “reasonably and in good faith” are protected from civil liability under the Protection of Persons Reporting Child Abuse Act 1998 (refer to Appendix 12).
- Under no circumstances should a child be left in a situation that exposes him or her to harm or to risk of harm pending HSE intervention. In the event of an emergency where it is thought that a child is in immediate danger and the HSE cannot be contacted, then contact should be made directly with the Gardaí. This may be done through any Garda station.

**Note:** The CLO will at all times inform the CEO and/or a member of the Management team of any and all allegations of child abuse or similar.

#### **A2.4 Steps to be taken by the Designated Liaison Person:**

As SFPC do not assume the role of Designated Liaison Person (DLP) guidance relating to associated duties will be the responsibility of the event organiser i.e. school etc. The SFPC CLO will be regarded as the point of contact between SFPC & the associated Designated Liaison Person

#### **A2.5 Cases not reported to the HSE or An Garda Síochána:**

In some cases the DLP may take the decision not to report concerns to the HSE or An Garda Síochána. SFPC may if required request an explanation why no action was taken. As SFPC do not assume the role of Designated Liaison Person (DLP) guidance relating to reporting will remain the responsibility of the event organiser.

#### **A2.6 An Allegation of Abuse against a Staff Member:**

When an allegation of abuse against an SFPC staff member is received, it should be assessed promptly and carefully by SFPC. Action taken in reporting an allegation of child abuse against a staff member should be based on an opinion formed 'reasonably and in good faith'. It will be necessary to consult with the associated DLP who will decide whether a formal report should be made to the HSE Children and Family Services.

The first priority is to ensure that no child is exposed to unnecessary risk. SFPC should as a matter of urgency take any necessary protective measures as outlined in Appendix 11. The measures should be proportionate to the level of risk and should not unreasonably penalise the staff member, financially or otherwise, unless necessary to protect children. Where protective measures penalise the staff member, it is important that early consideration be given to the case.

Where the SFPC CLO is aware of such an allegation they will immediately inform the associated DLP

When SFPC become aware of an allegation of abuse of a child or children by a staff member during the execution of that staff member's duties, SFPC should privately inform the staff member of,

- a) The fact that an allegation has been made against him or her and
- b) The nature of the allegation.

The staff member should be afforded the opportunity to respond.

SFPC should take care to ensure that, where applicable, action taken by it does not undermine or frustrate the investigations/assessments conducted by the HSE Children and Family Services or An Garda Síochána. SFPC will endeavour to maintain a close liaison with the associated DLP and any statutory authorities to achieve this.

**Malicious Claims:** If it is found that a malicious claim has been made by a member of the public, the case will be referred to the necessary authorities or if such a claim is made by a staff member SFPC's disciplinary process may be invoked.

### **Appendix 3: Training**

Appointed Child Liaison Officer will be required to familiarise themselves with the standards of behaviour and procedures outlined in this Policy.

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 17 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

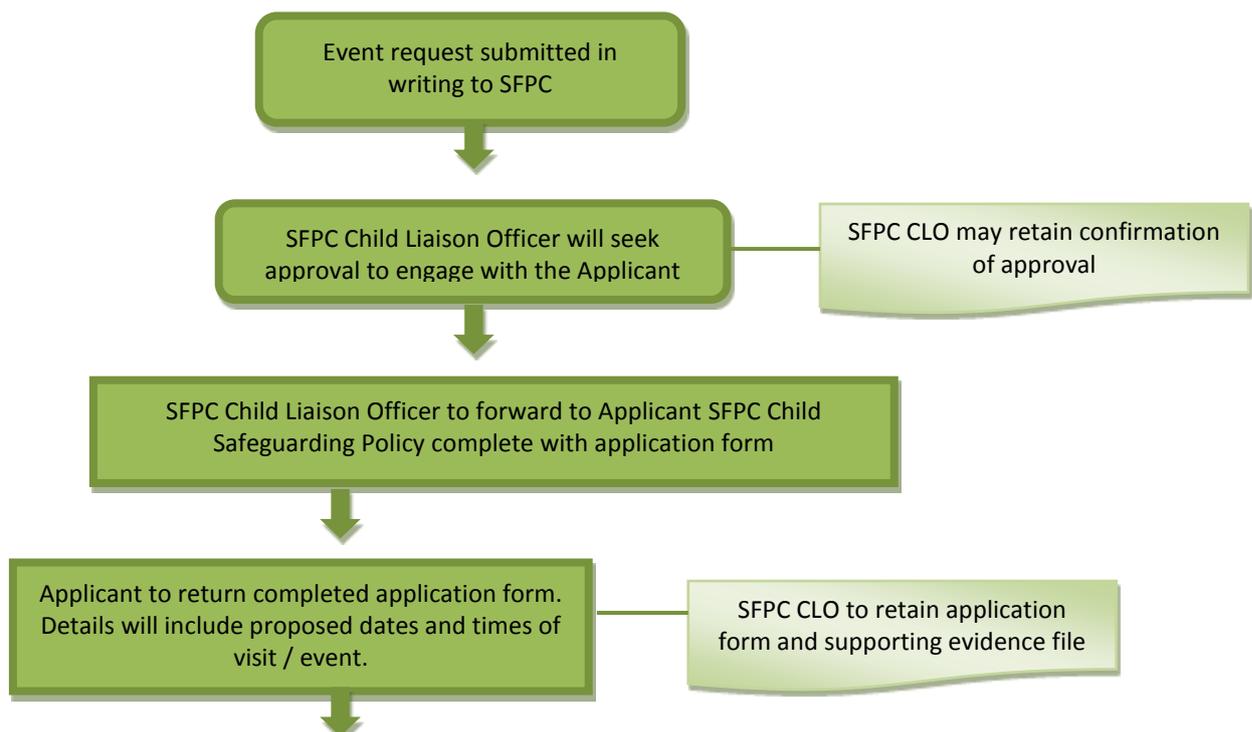
Induction Training for new SFPC staff will include training on SFPC Child Safeguarding Policy.

SFPC staff/volunteers whose duties may bring them into contact with children will have the appropriate level of training and/or guidance in the area of Child Protection consistent with their role at SFPC.

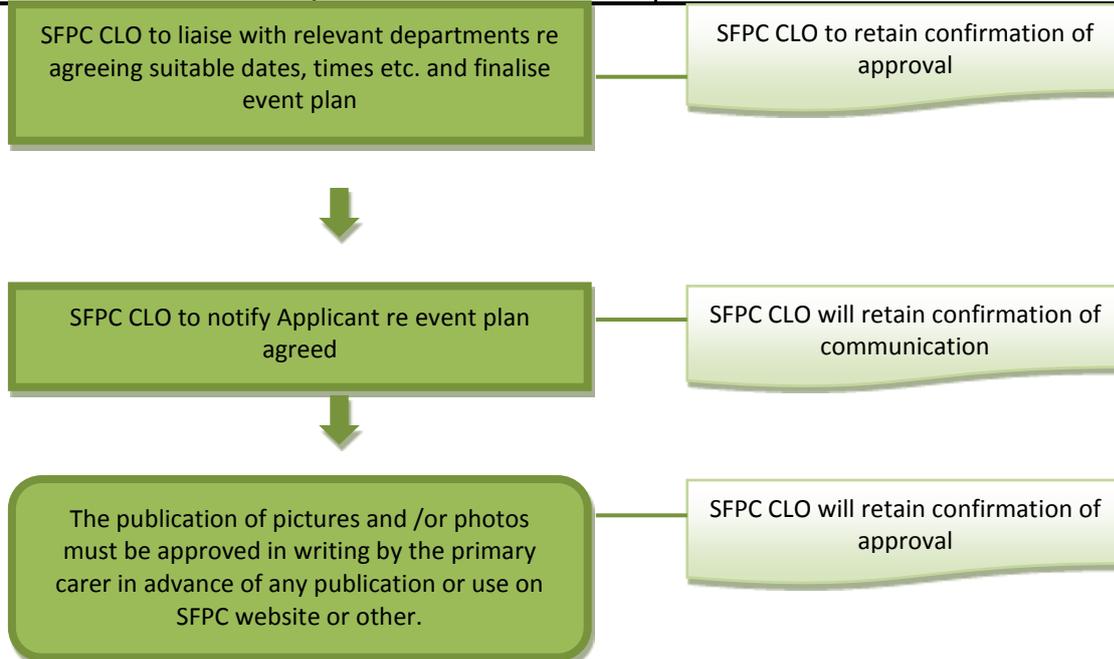
All SFPC employees will be communicated the principles of this policy.

SFPC will ensure this policy is communicated to contracted service providers and/or contractors who as part of their duties with SFPC may come into contact with children.

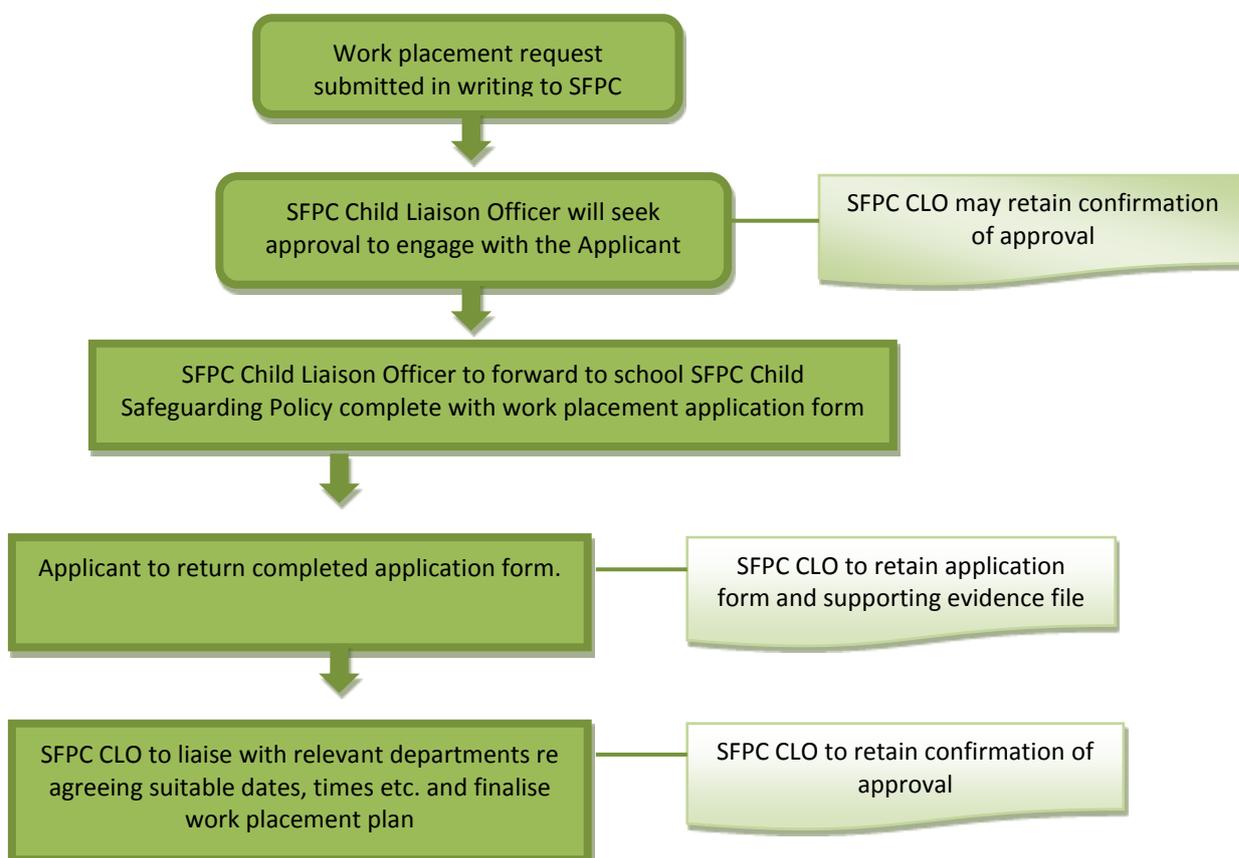
#### Appendix 4: Group Visitor Approval Process



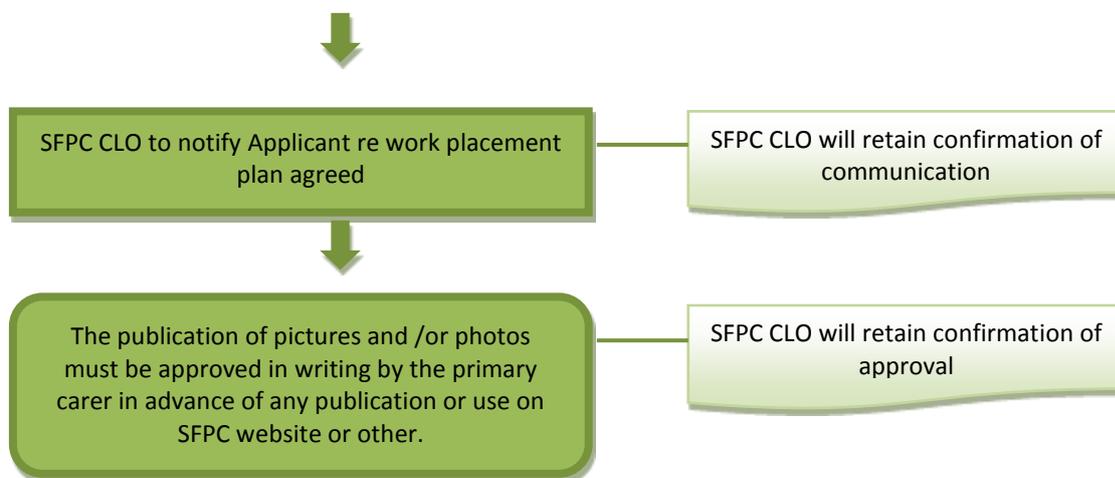
<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.: 01</b>	<b>Page 18 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	



**Appendix 5: Work Placement Approval Process**



<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 19 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	



## Appendix 6: Guidance for Student Work Placement

This guidance document will assist SFPC in preparing for work placement programmes to ensure the necessary risk management controls are in place.

Work placement programmes will provide students with an opportunity to:

- Observe a variety of tasks being completed in the workplace
- Enhance their knowledge and understanding and prepare them for the world of work ☐ Undertake supervised work appropriate to their skill level
- Evaluate industries that are of interest to them
- Explore potential career paths
- Develop skills for future employment Benefits to host employers

Participating in work placement programmes provides employers with an opportunity to:

- Participate in the education and career development of young people in the community
- Assist young people in evaluating potential career paths
- Identify young people with potential for their industry and develop future recruitment channels
- Strengthen their links with the community and raise their business profile
- Increase the supervisory, training and mentoring skills of their staff

Work placement programmes offered at SFPC

- Transition Year: Students partake in work placement as part of Transition Year. Some schools complete the placements over two weeks while others perform the placement one day per week over the course of the school year.
- Leaving Cert Vocational Programme (LCVP): LCVP is an additional intervention within the Leaving Certificate. It aims to foster in students a spirit of enterprise and initiative and to develop their interpersonal, vocational and technological skills. Work placement is as an optional module of LCVP and lasts for one week.

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 20 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

## **Appendix 7: Community Festivals and Other Externally Organised Events**

During Community Festivals the primary responsibility for the welfare of children accessing pre-approved port facilities rests with the festival organisers, event planners, primary carers, parents and group leaders.

Event organisers and /or planners will in all cases have and implement documented policies and procedures to ensure the welfare of the child / young person is protected at all times.

Documented evidence of event planning will be the responsibility of the event organiser and SFPC may on occasion or where deemed necessary request evidence that such plans exist and are implemented

Event organisers will ensure primary carers and all children and young people in their care, meet standards of good conduct and behaviour and are courteous and cooperative with SFPC staff.

During events primary carers of children/young people are required to remain with child/children/groups in their care at all times while on site.

In all cases and in accordance with the Children First legislation and National Guidance for the Protection and Welfare of Children it is the responsibility of the event organiser / planner to appoint a suitably competent *Designated Liaison Person* to act as a liaison with outside agencies and a resource person to any staff member or volunteer who has child protection concerns. The DLP will be responsible for reporting allegations or suspicions of child abuse to the HSE Children and Family Services or to An Garda Síochána.

## **Appendix 8: Recognising Child Neglect or Abuse**

Child abuse can be categorised into four different types: neglect, emotional abuse, physical abuse and sexual abuse. A child may be subjected to one or more forms of abuse at any given time. In the *Children First: National Guidance*, 'a child' means a person under the age of 18 years, excluding a person who is or has been married.

### *Recognising child neglect or abuse:*

Child neglect or abuse can often be difficult to identify and may present in many forms. A detailed list of indicators of child abuse is contained in *Children First National Guidance Document 2011*. No one indicator should be seen as conclusive in itself of abuse. It may indicate conditions other than child abuse. All signs and symptoms must be examined in the context of the child's situation and family circumstances.

### *Guidelines for recognition:*

The ability to recognise child abuse can depend as much on a person's willingness to accept the possibility of its existence as it does on their knowledge and information. There are commonly three stages in the identification of child neglect or abuse:

- considering the possibility;
- looking out for signs of neglect or abuse;
- Recording of information.

### *Stage 1: Considering the possibility:*

The possibility of child abuse should be considered if a child appears to have suffered a suspicious injury for which no reasonable explanation can be offered. It should also be considered if the child seems distressed without obvious reason or displays persistent or new behavioural problems. The possibility of child abuse should also be considered if the child displays unusual or fearful responses to parents/carers or older children. A pattern of ongoing neglect should also be considered even when there are short periods of improvement.

### *Stage 2: Looking out for signs of neglect or abuse:*

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	Page <b>21</b> of <b>24</b>
<b>Issue Date:</b> 06.02.2018	<b>Written by:</b> M Geoghegan	<b>Approved by:</b> P Keating	

Signs of neglect or abuse can be physical, behavioural or developmental. They can exist in the relationships between children and parents/carers or between children and other family members/other persons. A cluster or pattern of signs is more likely to be indicative of neglect or abuse. Children who are being abused may hint that they are being harmed and sometimes make direct disclosures. Disclosures should always be taken very seriously and should be acted upon, for example, by informing the HSE Children and Family Services. The child should not be interviewed in detail about the alleged abuse without first consulting with the HSE Children and Family Services. This may be more appropriately carried out by a social worker or An Garda Síochána. Less obvious signs could be gently explored with the child, *without direct questioning*. Play situations, such as drawing or story-telling, may reveal information.

*Some signs are more indicative of abuse than others. These include:*

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

Many signs of abuse are non-specific and must be considered in the child's social and family context.

It is important to be open to alternative explanations for physical or behavioural signs of abuse.

*Stage 3: Recording of information:*

If neglect or abuse is suspected and acted upon, for example, by informing the HSE Children and Family Services, it is important to establish the grounds for concern by obtaining as much information as possible.

Observations should be accurately recorded and should include dates, times, names, locations, context and any other information that may be relevant. Care should be taken as to how such information is stored and to whom it is made available.

## **Appendix 9: Procedures for Dealing with Lost/ Missing Children**

*Where a Child is Lost/ Left unattended:*

If it is determined that a child is lost or left unattended on an SFPC site, the following procedure will be adhered to by staff members:

Reassure the child and endeavour to obtain as much information about the child as possible:

- Name of Child;
- Age of Child;
- Address/ Name of School;
- Physical description of Child (Height, colour of hair, clothing etc.);
- Where the child was found.

If anyone else is with the child, ask them to remain with you until the primary carer has been located. If you are on your own with the child ensure that you are in a public area where you can be seen or heard and enlist the assistance of at least one other staff member immediately.

Make every effort to locate the primary carer by asking for assistance from other people in the area or using a mobile phone if available.

If the child is not claimed, contact the SFPC Child Liaison Officer and/or Designated Liaison Person who will then be responsible for initiating contact with An Garda Síochána.

Record in writing who found the lost child and give this record to the Designated Liaison Person for retention.

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	<b>Page 22 of 24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

*Where a Child is Reported Missing:*

If someone reports that a child is missing, the following information will be obtained by the staff member who receives the report:

- Name of Child;
- Age of Child;
- Address/ Name of School;
- Physical Description of Child (height, colour of hair, clothing etc.);
- Where the Child was last seen;
- The time the child was last seen.

The SFPC Child Liaison Officer and /or Department Manager will be notified immediately who in turn will contact the associated Designated Liaison Person.

All staff on site will be informed and a thorough check of all areas on site including bathrooms, offices and exits will be made.

Once a sufficient check is made, if the child is not found, the relevant Designated Liaison Person will be responsible for initiating contact with An Garda Síochána.

A written statement of events will be recorded by the staff member who initially received the report of the missing child. This statement will be retained by the associated Designated Liaison Person and a copy retained by the SFPC CLO.

#### **Appendix 10: Reasonable Grounds for Concern**

The HSE Children and Family Services should always be informed when a person has reasonable grounds for concern that a child may have been abused, or is being abused, or is at risk of abuse.

The following examples would constitute reasonable grounds for concern:

- a specific indication from the child that he or she was abused;
- an account by a person who saw the child being abused;
- evidence, such as an injury or behaviour, that is consistent with abuse and unlikely to be caused in another way;
- an injury or behaviour that is consistent both with abuse and with an innocent explanation, but where there are corroborative indicators supporting the concern that it may be a case of abuse. An example of this would be a pattern of injuries, an implausible explanation, other indications of abuse and/or dysfunctional behaviour;
- Consistent indication, over a period of time that a child is suffering from emotional or physical neglect.

A suspicion that is not supported by any objective indication of abuse or neglect would not constitute a reasonable suspicion or reasonable grounds for concern. However, these suspicions should be recorded or noted by the relevant Designated Liaison Person as future suspicions may lead to the decision to make a report and earlier suspicions may provide important information for the HSE Children and Family Services or An Garda Síochána.

#### **Appendix 11: Allegation of Abuse**

The HSE Children and Family Services receive allegations of abuse against people who have contact with children in their workplace or in a recreational setting. If the HSE considers that children are, or may be, at immediate risk from the alleged abuser, contact should be made with the institution or employer immediately. In this situation, it is not necessary to notify the alleged abuser in advance of the allegations against him or her.

Where the HSE proposes to notify an alleged abuser's employer or person-in-charge where he or she attends, and where there is no immediate danger to children, the alleged abuser must be notified in advance of the

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	Page <b>23</b> of <b>24</b>
<b>Issue Date:</b> 06.02.2018	<b>Written by:</b> M Geoghegan	<b>Approved by:</b> P Keating	

allegations against him or her. The approach to an employer or person-in-charge in such cases may take place at any stage in a wider investigation and it may be practical that such an approach does not occur until any criminal investigation or HSE assessment has concluded.

The HSE Children and Family Services should provide feedback to the employer or person-in-charge on the progress of a child abuse assessment/investigation involving an employee. The HSE should seek to complete its assessment as quickly as possible, bearing in mind the serious implications for innocent employees.

Employers or persons-in-charge should be notified of the outcome of the HSE assessment and/or the Garda investigation. This will assist them in reaching a decision about the action to be taken in the longer term concerning the employee.

## **Appendix 12: Protection for Persons Reporting Child Abuse**

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 HSE or An Garda Síochána. This means that even if a reported suspicion of child abuse proves unfounded a plaintiff who took action would have to prove that the reporter had not acted reasonably and in good faith in making the report.

This protection applies to organisations and to individuals. It is considered therefore that organisations should assume full responsibility for reporting suspected child abuse to the appropriate authorities. Reports to the HSE and to the Garda Síochána should be made as per SFPCs policy and guidelines.

*Section 3 (1) of the Act states:*

“3. (1) A person who apart from this section, would be so liable shall not be liable in damages in respect of the communication, whether in writing or otherwise, by him or her to an appropriate person of his or her opinion that -

- a) a child has been or is being assaulted, ill-treated, neglected or sexually abused, or
- b) a child's health development or welfare has been or is being avoidably impaired or neglected, unless it is proven that he or she has not acted reasonably and in good faith in forming that opinion and communicating it to the appropriate person”.

Under Section 4 of the same Act no employee will be penalised for making a report of child abuse in good faith to the HSE or to the Garda Síochána.

### **The Defence of Qualified Privilege**

A person who makes a report in good faith and in the child's best interests may also be protected under common law by the defence of qualified privilege.

The Common Law provides a defence, in particular circumstances, to individuals who make verbal or written statements of a kind, which could expose their author to a claim of defamation if such statements were made in different circumstances. The defence exists in recognition of the fact that there are circumstances in which individuals have to be able to speak freely without fear of adverse legal consequences.

In general, the privilege covers situations where the maker of the statement has a duty to speak or is obliged to protect some interest. The duty in question does not have to be a strictly legal one: a moral or social duty to make a statement or report is sufficient. The recipient of the statement must have a corresponding duty to

<b>SFPC POLICY</b>		<b>Child Safeguarding Policy &amp; Guidelines</b>	
<b>Doc No. : PRO35</b>		<b>Rev No.:</b> 01	Page <b>24</b> of <b>24</b>
<b>Issue Date: 06.02.2018</b>	<b>Written by: M Geoghegan</b>	<b>Approved by: P Keating</b>	

receive the statement. The defence only applies where the individual who makes the statement is not motivated by malice in making this statement.

In circumstances where an individual has a duty to speak and does so without malice, he can be assured that the defence of the qualified privilege will protect him from any defamation claim to which his statement could possibly give rise. The defence will apply, for example, when an employee reports to his line manager (or some specially designated person), his bona fide suspicion that a fellow employee may have committed an act of abuse in the course of the latter's employment.