

# Child Protection Policy

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## Child Protection Policy

### **1. Statement**

- 1.1 Travel Ireland Ltd (“the Company”) is fully committed to the care, support and welfare of each child and young person participating in our programmes and events. We strive to promote awareness in best practice in child welfare and protection within the company.
- 1.2 We implement best practice in all areas of our child protection policy in adherence with “Children First: National Guidance for Protection and Welfare of Children” the guidelines produced by the Department of Children and Youth Affairs. We also work in partnership with the HSE and An Garda Síochána in all matters that pertain to the protection of children, where possible.
- 1.3 This document sets out our Child Protection guidelines and will be reviewed and updated as necessary to reflect changes in national guidelines and legislation.

### **2. Definitions**

- 2.2 For the purposes of this document a “child” means someone under the age of 18 years, ` excluding a person who is or has been married.
- 2.3 “Concern” means information which would lead a person to suspect that a child is being abused.
- 2.4 Child Abuse can be categorised into four different types:
  - Neglect
  - Emotional Abuse
  - Physical Abuse
  - Sexual Abuse
- 2.5 “Neglect” is an omission, where a child suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults and/or medical care.

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- 2.6 “Harm” is the ill-treatment or impairment of the health or development of a child. Whether it is significant is determined by the child’s health and development as compared to that which could be reasonably of a child of a similar age. The threshold of significant harm is reached when the child’s needs are neglected to the extent that his or her well-being and/or development are severely affected.
- 2.7 “Emotional Abuse” is normally found in the relationship between a parent/carer and a child rather than in a specific event or pattern of events. It occurs when a child’s developmental need for affection, approval, consistency and security are not met.
- 2.8 “Physical Abuse” results in actual or potential physical harm from an interaction or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents.
- 2.9 “Sexual Abuse” occurs when a child is used by another person for his or her gratification or sexual arousal, or for that of others.
- 2.10 “Local Organiser” Local Organisers are an independent businesses or individuals which recruit host families directly in their geographical area.
- 2.11 “Our Host Families” are the families which are directly recruited by the Company
- 2.12 “Teachers” refers to the teachers directly recruited by the company.

## **3. Good Practice Guidelines**

- 3.1 All local organisers, our host families and teachers assisting the Company in our work are aware of the good practice guidelines and are familiar with the overall child protection policy of the office. The Local Organisers will sign an Acceptance of the Child Protection Policy Form; see Appendix 1.
- 3.2 The Company has appointed a “Child Protection Officer” to deal with any complaints or issues arising which concerns the safety or welfare of any participating child.
- 3.3 The Company has put in place an anti-bullying policy; see Appendix 2
- 3.4 The Company has put in place a complaints register; see Appendix 3, and complaints procedure; see Appendix 4.
- 3.5 An appropriate ratio of adults to young people is put in place for activities organised by the Company. The ratio may vary depending on the particular situation, the age of the participants and their disability or other special needs.

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- 3.6 Staff and host families show respect and understanding for the rights, safety and welfare of the children and young people;
- 3.7 Where an adult needs to meet with a child alone, the door should be left open and another adult informed of the meeting. Staff should not spend an excessive amount of time alone with a child.
- 3.8 There should be no unnecessary physical contact between an adult and a young person. Physical contact should only be in response to the needs of the child and should be appropriate to the age and the level of development of the child.
- 3.9 Any incidents or accidents that occur while the child is in the care of the Company shall be recorded and records shall be kept in Accident/Incident Forms; see Appendix 5.
- 3.10 There are clear channels of communication and access to staff in the office if client agencies, group leaders, host families, parents/guardians or children wish to voice their concerns if there is something they are not happy about.

## **4. Host Families & Teachers**

### **Recruitment**

- 4.1 The Company ensures best practice in the recruitment of staff, teachers and host families, which includes Garda vetting where such vetting is made available by Gardaí, researching references, good HR practices in interviewing, training, and on-going supervision and management.
- 4.2 All applicants should be asked to supply in writing information in the application form see Appendix 6, the following:
  - appropriate personal details
  - a resumé of past and current work/volunteering experience, indicating relevant qualifications or skills acquired (teaching applicants)
  - at least two written references – verification of references should be sought through making verbal contact with the referees. (teaching applicants)
  - All of our host families shall receive Garda vetting prior to engagement of their role, if such vetting is available. The Garda vetting forms are to be retained for record keeping; see Appendix 7.
- 4.3 The Company will hold record of the contact name and address, and any other relevant information, of local organisers, teachers or host families. This information may be made available to the HSE by the Child Protection Officer on request.

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- 4.4 Host families shall be visited once every 2 years on an on-going basis to continue to assess suitability for the role; See Appendix 8.
- 4.5 Local Organisers who recruit host families independently of the company shall be responsible for ensuring best practice in the area of Child Protection in compliance with their statutory obligations.
- 4.6 Teachers will be required to fill out an Inter-Organisational Garda Vetting form as set out in Appendix 9 unless Garda Vetting is to be carried out by the Company.

## **Guidance and Procedures**

- 4.7 The Company provides guidance and procedures for staff and hosts who may have reasonable grounds for concern about the safety and welfare of children involved with the organisation.

## **Training**

- 4.8 Local Organisers shall be offered training in child protection to maintain high standards and good practice.
- 4.9 Our host families and teachers shall be aware of how to recognise signs of child abuse or neglect.

## **5. Accommodation**

- 5.1 The client agency will be given full contact details of accommodation and also an emergency contact number.
- 5.2 The norm is for 2 or 3 children to be accommodated with each host family, however on occasion there may be 1 student placed in a host family.
- 5.3 Children in the short stay and school tours are always placed with a minimum of 2 per host family.

## **6. Course Activities**

- 6.1 Parent/guardian consent will be obtained for each participant booking a stay directly with the Company, prior to the course, including information on each participant about the following, see Appendix 10:
- Contact details of parent/guardian and another person named by the parent/guardian in the event of the parent/guardian not being available in an emergency

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- All relevant medical information for the participant and consent for medical intervention, if necessary
  - Any special needs which the participant may have, including diet, medical needs, support needs, etc;
- 6.2 Where students are booked through an agency, Parent/guardian consent issues are dealt with by the sending agency.
- 6.3 All staff will show respect and understanding for the children involved;
- 6.4 A list of rules will be drawn up for each summer course, and these will be distributed to all participants . See Appendix 11.

## **7. Disruptive Behaviour**

- 7.1 The Company ensures that the safety and welfare of the children is a priority and that staff will deal sensitively and professionally with any difficult issues that may arise.
- 7.2 Where instances of challenging or disruptive behaviour occur with child, a record will be kept of this where the instance requires the intervention of one of our host families, or a teacher or where the safety and well-being of others are at risk.
- 7.3 In this instance, our host family, or member of staff are required to request an Incident/Accident report form, the report of the incident will be recorded in the Incident/Accident Form; see Appendix 5. This form will then be returned to the Child Protection Officer.

## **8. Child Protection Officer**

### **Appointment**

- 8.1 The Company shall appoint one director as the Child Protection Officer. This is to be made in writing. This person shall hold responsibility relating to child safeguarding within the organisation, and ensure proper implementation of relevant legislation. The person currently appointed to this position is Mary Cadogan.

### **Functions**

- 8.2 The role of the Child Protection Officer involves the following duties:
- To be familiar with “Children First, National Guidelines for the Protection and Welfare of Children and “Our Duty to Care”, the principles of good practice for the



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protection of children & young people and to have responsibility for the implementation and monitoring of the child protection; see Appendix 12.

- To receive reports of alleged/suspected or actual child abuse and act on these in accordance with the guidelines;
- To ensure that training is provided for where necessary
- To build a working relationship with the HSE, An Garda Síochána and other agencies, as appropriate;
- To keep up to date and undertake relevant training on child protection policy and practice.
- To review the Company's policy and procedures on child protection on an annual basis and amend as appropriate;
- To ensure that systems are in place for recording and retaining all relevant documentation in relation to child protection issues.

8.3 Should the Child Protection Officer decide not to report a concern or allegation of child abuse brought to him or her they must report, at the time of making the decision not to report, his/her reasons for not reporting and any action s/he takes in relation to the case.

8.4 The Child Protection Officer is responsible for attending meetings with the HSE if and as required, assisting the HSE in providing information regarding assessment of risk to the child and assisting in any related matter.

8.5 The Child Protection Officer shall assist the HSE in

(i) assessment of risk;

(ii) investigation of concerns or allegations of child abuse being undertaken by the HSE, and

(iii) any related matter including the provision of additional written reports when requested by the HSE ;

8.6 The Child Protection Officer must keep a copy of the Child Protection Policy on the premises and it should be made available to a parent or guardian of child availing of the services of the Company if requested.

## **9. Annual Internal Audit**

9.1 The Child Protection Officer shall appoint an internal audit committee, consisting of 2 persons, which acts independently of the Child Protection Officer;

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- 9.2 At least one member of the internal Audit Committee is to have experience of working with children;
- 9.3 The internal audit committee is to conduct an annual review of the effectiveness of the implementation, within the organisation, of both the Keeping Children Safe Plan, and to report their findings to the Child Protection Officer together with their recommendations. The Audit Committee is to have a particular focus on managing any safety or welfare risks to children who avail of the services provided by the organisation;
- 9.4 The Designated Officer is to implement the recommendations of the internal audit committee made in accordance with 9.3 above.
- 9.5 If the Audit Committee has concerns that it believes should be brought to the attention of the HSE, it should do so

## **10. Recognising Child Neglect or Abuse**

- 10.1 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. See Appendix 13 for Guidelines to Recognising Child Abuse.
- 10.2 In the event of a child disclosing an incident of abuse it is essential that this is dealt with sensitively and professionally by the host family, teacher or local organiser involved. The following are guidelines to support the worker/volunteer in this:
- React calmly;
  - Listen carefully and attentively; take the young person seriously;;
  - Check back with the child/young person that what you have heard is correct and understood;
  - Record the conversation as soon as possible, in as much detail as possible. Sign and date the record;
  - Ensure that the child/young person understands the procedures which will follow;
  - Pass the information to the Child Protection Officer, do not attempt to deal with the problem alone;
  - Treat the information confidentially.

## **11. Reporting Child Abuse**

- 11.1 All teachers, host families and **local organisers** are obliged to report to the Child Protection Officer any concerns or allegations of child abuse which come to their attention in the course of their employment.
- 11.2 Any director, staff, teacher or our host families may report concerns or allegations directly to the HSE without informing the Child Protection Officer, if he/she believes that it would be in the best interest of the child to do so.

### **Responsibility to Report Child Abuse**

- 11.3 Everyone must be alert to the possibility that children with whom they are in contact may be experiencing abuse or have been abused in the past..
- 11.4 The guiding principles in regard to reporting children abuse are summarised as follows:
- The safety and well-being of the child or young person must take priority
  - Reports should be made without delay to the HSE
  - While the basis for concern must be established as comprehensively as possible, children or parents should not be interviewed in detail about the suspected abuse.
- 11.5 In making a report on suspected or actual child abuse, the individual must ensure that the first priority is always for the safety and welfare of the young person and that no young person is ever left in an un-safe situation.
- 11.6 Parents/guardians of the child will be informed of the allegation, concern or disclosure unless doing so is likely to endanger the child.
- 11.7 In matters of child abuse, an employee/volunteer should never promise to keep secret, any information which is divulged. It should be explained to the young person that this information cannot be kept secret but only those who need to know will be told.
- 11.8 It is essential in reporting any case of alleged/suspected abuse that the principle of confidentiality applies. The number of people that need to be informed should be kept to a minimum.

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11.9 The management of child protection concerns that arise in relation to activities that are not the company related and do not involve its personnel is a matter for the HSE and An Garda Siochana. The responsibility of the company in such situations is to make sure that any information it has on these matters is relayed to the relevant agency as quickly and as comprehensively as possible.

## **12. Allegations against Local Organisers, Host Families or Teachers**

12.1 Where an allegation of abuse is made against **local organiser** our host family or teacher involved with the company, there are two procedures that the company will put in place:

- The reporting procedure in respect of the child; see Appendix 14
- Procedure for dealing with the Accused; see Appendix 15.

12.2 The Child Protection Officer will follow the normal reporting procedure in the company, found in Appendix 14. It will be the responsibility of the Directors of the company to deal with a staff member against whom an allegation has been made.

12.3 If there is an allegation or suspicion in relation to the Child Protection Officer, another Director of the company will deal with all aspects of the case, including the reporting procedure.

## **13. Complaints**

13.1 The company is committed to ensuring the safety and welfare of all children with whom we work directly.

13.2 The company has a complaints procedure, see appendix 4, to cover any situations when children or their parents/guardians are not happy with the way the children were treated by the company.

13.2 Complaints regarding the safety and welfare of children should be directed to the Child Protection Officer in the company.

13.3 Any complaints shall be recorded in the Complaints Register; see Appendix 3.

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## **14. Record Keeping**

14.1 The Child Protection Officer and the Directors are responsible for keeping the following records related to Child Protection. The Child Protection Officer and the directors are the only people who have access to these records:

- The complaints register about the safety and welfare of children;
- Any disclosures, concerns or allegations of child abuse;
- The follow up to any complaints, disclosure, concerns or allegations, including informal advice from the HSE, reports to the HSE and informing parents/guardians;
- Signed acceptance forms of the Child Protection Policy;

14.2 The Child Protection Officer, the Deputy Child Protection Officer and the Directors of the company are the only officers who have access to these records:

- Garda Vetting Forms;
- All Parental/Guardian Consent Forms.

## **15. Conclusion**

15.1 The foregoing Child Protection Policy has been adopted by the Company in pursuance of its statutory obligations and in contemplation of the new legislative requirements in the Children First Bill 2012.

**Dated:**

**Signed on behalf of the Company:**

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## Appendix 2

### Anti-Bullying Policy

Bullying behaviour can be defined as repeated aggression which is conducted by an individual or group against others.

The company will not tolerate any bullying behaviour.

- All children and adults who participate in activities run by the company will be treated with dignity and respect by adults and by other children and will not be subject to bullying.
- All children and adults who participate in activities run by the company have a responsibility to treat other children and adults with dignity and respect and refrain from bullying behaviour.
- If a local organiser, host family or teacher witnesses bullying or suspects that bullying is taking place he/she will follow the procedure outlined below.
- If a child witnesses bullying or suspects that bullying is taking place, he/she should report it to the company. The company will follow the procedure outlined below.
- If a child is the victim of bullying he/she should report it to the company who will follow the procedure outlined below.

#### Procedure for dealing with bullying

- All reports of bullying will be recorded, investigated and dealt with.
- The local organiser, teacher or host family who has received the complaint or witnessed the bullying will consult with the Child Protection Office, if present, or another Director of the company present to decide who is the most appropriate person to follow up on the complaint.

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- Those dealing with the complaint will keep a record of the alleged bullying incident/s and the investigation and action taken.
- Those dealing with the complaint will speak separately to all involved in order to get all sides of the story. They should also speak to others who may have witnessed the incident/s, if appropriate. The staff member will interview all involved in a calm manner and will seek answers to what, where, when, who and why.
- If the victim of the alleged bullying is a child, their parent/guardian/group leader will be informed of the complaint and the outcome of the investigation.
- If the perpetrator of the alleged bullying is a child their parent/guardian/group leader will be informed of the complaint and the outcome of the investigation.
- If the staff member dealing with the complaint concludes that bullying has not taken place, the following action will be taken:
  - The complainant, alleged victim and alleged perpetrator/s will be informed of the outcome of the investigation and the reasons why it was concluded that bullying did not take place;
  - A meeting will be arranged between the alleged victim and alleged perpetrator to discuss the issues involved if both are agreeable and it is deemed appropriate
- If the staff member dealing with the complaint concludes that bullying has taken place, the following action will be taken:
  - The complainant, alleged victim and alleged perpetrator/s will be informed of the outcome of the investigation and the reasons why it was concluded that bullying took place;
  - A meeting will be arranged between the alleged victim and alleged perpetrator to discuss the issues involved if both are agreeable and it is deemed appropriate;
  - A meeting will be held with the perpetrator to discuss the bullying behaviour. They will be informed of the disciplinary action, which will be taken as a result of this bullying behaviour.

## Appendix 4

### **Complaints Procedure in relation to working with children/young people**

The company is committed to ensuring the safety and welfare of all children/young people with whom we work.

This complaints procedure aims to cover any situation which may arise, when children or their parents/guardians/leaders are not happy with the way children were treated while attending a programme.

#### **Who can make a complaint?**

Complaints can be made by:

- Children;
- Their parents/guardians;
- Staff members of the sending organisation;
- Other advocates on behalf of children/young people.

#### **How to make a complaint**

1. If the complaint is in relation to the safety and welfare of children/young people the complaint should be made to the Child Protection Officer.
2. Other complaints should be made to the person with whom the child/young person dealt.

#### **Information you need to provide**

Complaints must be made in writing. By providing the following information you can help to speed up the investigation of your complaint.

- The name and address of the child affected and the programme on which they were enrolled;
- If the complaint is being made by a parent/guardian or other adult, the name and address of that person;
- Exactly what you are dissatisfied with;
- The name of the person(s) who dealt with you.



## **Our standards for dealing with complaints**

- If the complaint relates to the safety and welfare of a child/young person, it will be examined in accordance with good practice in relation to the safety and welfare of children;
- The complaint will be recorded in the Complaints Register;
- We will treat your complaint properly, fairly and impartially and in the best interests of the child/young person;
- A person other than those originally involved will examine your complaint;
- We will apologise for any mistreatment of the child, explain what happened and put it right wherever possible;
- We will change the way we do things to avoid making the same mistake in future.

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## Appendix 13

### Staff and Host Family Guidelines for Recognition of Child Abuse

#### 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;
- The child seems distressed without obvious reason or displays persistent or new behavioural problems;
- The child displays unusual or fearful responses to parents/carers or older children

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

The signs of neglect or abuse can be physical, behavioural or developmental. A cluster or pattern of signs is more likely to be indicative of neglect or abuse.

Direct disclosures regarding abuse should always be taken very seriously and should be acted upon.

The child should not be interviewed in detail about the alleged abuse without first consulting with the HSE Children & Family Services. This is more appropriately done by a

Social worker or Garda Síochána.

#### Stage 3: Recording of Information

If neglect or abuse is suspected and acted upon, 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 relevant information.

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## Appendix 14

### Reporting Procedure

The HSE Children & Family services will be informed when a person has reasonable grounds for concern that a child may have been, is being or is at risk of being abused or neglected.

Any reasonable concern or suspicion of abuse or neglect must elicit a response.

The reporting procedure for dealing with disclosures, concerns or allegations of child abuse is outlined in the following steps:

- The employee or volunteer who has received a disclosure of child abuse or who has concerns of abuse, should bring it to the attention of the Child Protection Officer immediately.
- The Child Protection Officer will assess and review the information that has been provided. The CPO may contact the HSE for informal advice relating to the allegation, concern or disclosure.
- After consultation with the HSE officials, the Child Protection Officer will then take one of two options:
  - Report the allegation, concern or disclosure to the HSE OR
  - Not make a formal report to HSE but keep a record of the concerns on file. The reasons for not reporting the allegation, concern or disclosure will be clearly recorded. The employee/volunteer who made the initial report will be informed if a formal report is not being made to the HSE and it is open to him/her to make a formal report themselves, directly to the relevant authority if they feel this is necessary.
- Where a formal report is made the HSE will then liaise with An Garda Síochána. It is likely that the HSE will want to speak to the person who first made the report to clarify facts and the circumstances of the report.

In reporting concerns and allegations to the HSE the designated officer must include:

1. Name, contact details and position of the person making the report;
2. Name, age and contact details of the child, parents or guardians, about whom the report is being made;
3. Nature of the relationship between the reporter and the child;
4. Nature of the information and of the abuse;
5. Information regarding the alleged abuser;
6. Source of information;
7. Confirmation as to whether the parent/guardian is aware of the report;
8. Confirmation as to whether the child is aware of the report;
9. Confirmation as to whether the parent/guardian and child are in agreement regarding the making of a report
10. Information on whether the report in relation to the particular child or in relation to the alleged perpetrator had been made previously and if so the dates and concerns and any other information relating to the protection and welfare of the child or children.