

Child Protection Policy

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Introduction

The Central Bank of Ireland (the Central Bank) is fully committed to safeguarding the well-being of any and all children with whom we engage in any capacity as part of Central Bank business. This policy on child protection reflects the Bank's compliance with the requirements of the Children First Act of 2015 (the Act). The Central Bank is committed to promoting the rights of the child including the participation of children in matters that affect them.

Purpose

The purpose of this policy is to adopt the safest possible practices to minimise the risk of harm or abuse to children and to provide a guide for colleagues that will ensure the safety of children¹. The Bank aims to safeguard the welfare of any child who, on occasion, is onsite.

The objectives of this policy are set out below;

- To state our commitment as an organisation to safeguard the welfare of any and all children with whom colleague's interact throughout the course of their employment with the Bank and display a Child Safeguarding Statement;
 - To complete a risk assessment to identify any potential for harm to any child while visiting the Bank and use this in conjunction with the Child Safeguarding Statement; and
 - To appoint a relevant person to be the first point of contact in respect of communicating the Central Banks' Child Safeguarding Statement.

¹ In accordance with Section 2 of the Act a child/ children is any person under the age of 18 years who is not or has not been married

Scope

This policy applies to all Central Bank colleagues², third party contractors and consultants.

Policy Statement

Compliance with the Act

- The Central Bank has a number of obligations as set down by the Act because it qualifies as the provider of a "relevant service" in respect of a limited number of activities;
- A relevant service under the Act includes any work or activity, which consists of the provision of educational, research, training, cultural, recreational, leisure, social or physical activities to children, whether or not for commercial or any other consideration.
- Educational activities of the Central Bank relate to, for example, school visits and the onsite work-experience of second level students. Social activities may include, but are not limited to, events like the children's Christmas party or the family visit day where children are temporarily permitted onsite.

Commitment to Child Protection

As the provider of a relevant service, the Central Bank has produced a risk assessment and Child Safeguarding Statement. It has further nominated designated liaisons within the HR Advisory Team in respect of Part 2 of the Act dealing with child safeguarding statements.

² For the purpose of this policy colleague/ employee refers to anyone who has a contract of employment with the Bank

Child Safeguarding Statement and Risk Assessment

- The Child Safeguarding Statement is a written statement that specifies the service being provided and the principles and procedures to be observed to ensure, as far as is practicable, that a child availing of the service is safe from harm;
- The statement includes a written assessment of the risks and specifies the procedures in place to address specific issues identified in the Act;
- The purpose of the risk assessment is to identify any potential harm that a child could suffer while availing of the relevant services, as explained in Schedule 1 'Relevant Services' section in the Actin the Bank;
- 'Risk' in this context is the risk of harm as defined under the Act and not a general health & safety risk. The Central Bank has used this risk assessment to prepare a Child Safeguarding Statement that outlines how these risks will be managed. A risk assessment is an exercise where the Central Bank examines all aspects of its provision of the relevant service, from a safeguarding perspective, to establish whether there are any practices or features that have the potential to put children at risk:
- The Child Safeguarding Statement will be reviewed every two years and more frequently in response to changes in legislation or national guidance. It will be displayed on Plaza and publically on the external site as well. It will further be made available to all parents and guardians, Tusla, and members of the public upon request.

Designated Liaisons

- The Central Bank has identified designated liaisons, within the HR Advisory Team, to act as the first point of contact in respect of the Child Safeguarding Statement;
- They should record all reasonable concerns or allegations of abuse brought to their attention, and the actions taken in response to a concern or allegation of child abuse, ensuring that the standard reporting procedure (see Reporting Procedures

- and Responsibilities section below) is followed when reporting allegations or suspicions of child abuse to the Child and Family Agency (Tusla);
- They will act as a liaison with outside agencies and as a resource person to any colleague with child protection concerns. Please contact the HR Advisory Team for further information:
- In respect of child safeguarding training and information, including the identification of the occurrence of harm, designated liaisons within the HR Advisory Team have completed Tusla's eLearning programme on the Children First Act.

Relevant Services

- The Central Bank is considered a provider of relevant services under the Act because it engages in work or activities that include the provision of educational, research, training, cultural, recreational, leisure, social or physical activities to children;
- The Bank is also involved in Corporate Social Responsibility (CSR) activities that bring colleagues into contact with children in a limited capacity. This primarily involves, but is not limited to, activities that occur in education-based centres located in the surrounding community. Colleagues involved in these initiatives will be Garda vetted by the host organisation where they are volunteering;
- In circumstances where there is a scheduled CSR activity involving interaction between colleagues and children the CSR co-ordinator will first contact the host organisation to ensure that they have their own Child Safeguarding Statement. The CSR co-ordinator will ensure that Central Bank volunteers are thus guided by the organisations' child safeguarding policies, procedures, and the direction of their own Designated Liaison.

Reporting Procedures and Responsibilities

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

- Any colleague who has received a disclosure of child abuse, or who has reasonable concerns of abuse, should immediately bring it to the attention of the HR Advisory Team. The Head of Human Resources should also be informed of the situation:
- The Designated Liaison from the HR Advisory Team will assess and review the information that has been provided and may contact Tusla on a no-name basis for informal advice relating to the allegation, concern or disclosure;
- After consulting with Tusla, the Designated Liaison from the HR Advisory team will then take one of two actions:
 - Report the allegation, concern or disclosure to Tusla the Designated Liaisons within HR Advisory team will always inform Tusla if reasonable grounds for concern exist; or
 - Not make a formal report to Tusla but keep a record of the concerns on file. Any actions taken because of a concern should be recorded. The reasons for not reporting the allegation, concern or disclosure will also be clearly recorded. The colleague who made the initial report will be given a clear written explanation of the reasons why the concern is not being reported to Tusla. It is then open to them to make a formal report, directly to the relevant authority, if they feel this is necessary;
- A report to Tulsa can be made in person, by telephone, in writing, or by email. Contact numbers for all Tusla offices are available on their website www.tusla.ie;
- In an emergency where Tusla is not available, and there is a concern for the safety of a child, then a report should be made directly to An Garda Síochána;
- 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 child. Parents/legal guardians of the child will be informed of the allegation, concern or disclosure unless doing so is likely to endanger the child;
- All records relating to any incident relating to this policy will be retained in a secure place; and

The Designated Liaison will have access to relevant records when required. The retention of records will be in accordance with standard HR practice and the Central Bank's data protection policy.

Recruitment, Parental Consent and Legal Protections

Recruitment

All colleagues and contractors undergo Garda Vetting as part of the pre-employment induction process.

Parental Consent

An Engagement Consent Form must be signed by a parent/guardian, in advance of any second level work placement, confirming they are granting permission for their child to participate in the agreed activity.

Legal Protections

The Protections for Persons Reporting Child Abuse Act 1998 makes provisions for certain protections from civil liability of persons who have formed their opinion and communicated child abuse concerns 'reasonably and in good faith' to designated officers of the Child and Family Agency (Tusla) or to any member of An Garda Síochána. These protections apply to organisations as well as to individuals. This Act also extends certain protections to employees whereby employers may not penalise employees for forming opinions and communicating concerns 'reasonably and in good faith' also.

Any abuse allegation must be dealt with sensitively and support and, if necessary, counselling may be provided. While the primary goal must be to protect the child, care must be taken to ensure that the colleague is treated fairly. It is critical that a proportionate response is taken to each case that arises specifically because of the nature and type of abuse that could be the subject of the allegation.

