



THE NATIONAL BOARD FOR
SAFEGUARDING CHILDREN
IN THE CATHOLIC CHURCH

Review of Child Safeguarding Practice

In the religious congregation of

The Institute of the Blessed Virgin Mary
(Loreto Sisters)

undertaken by

The National Board for Safeguarding Children in the
Catholic Church in Ireland (NBSCCCI)

Date May 2015

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Background

The National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI) was asked by the Sponsoring Bodies, namely the Irish Episcopal Conference, the Conference of Religious of Ireland and the Irish Missionary Union, to undertake a comprehensive review of safeguarding practice within and across all the Church authorities on the island of Ireland.

The NBSCCCI is aware that some religious congregations have ministries that involve direct contact with children while others do not. In religious congregations that have direct involvement with children, reviews of child safeguarding have been undertaken by measuring their practice compliance against all seven Church standards. Where a religious congregation no longer has, or never had ministry involving children and has not received any allegation of sexual abuse, the NBSCCCI reviews are conducted using a shorter procedure. The size, age and activity profiles of religious congregations can vary significantly and the NBSCCCI accepts that it is rational that the form of review be tailored to the profile of each Church authority, where the ministry with children is limited or non-existent. The procedure for assessment of safeguarding practice with such congregations is set out in the contents page of this report. The NBSCCCI welcomes that in order to have full openness, transparency and accountability, religious congregations that do not have ministry with children have made requests to have their safeguarding practice examined and commented upon.

The purpose of this review remains the same and it is to confirm that current safeguarding practice complies with the standards set down within the guidance issued by the Sponsoring Bodies in February 2009 *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland* and that all known allegations and concerns had been appropriately dealt with. To achieve this task, safeguarding practice in each of these Church Authorities is reviewed through an examination of policy and procedures, and through interviews with key personnel involved both within and external to the Religious Congregation.

This report contains the findings of the *Review of Safeguarding Practice within The Institute of the Blessed Virgin Mary (Loreto Sisters)* undertaken by the NBSCCCI in line with the request made to it by the Sponsoring Bodies.

The findings of the review have been shared with a reference group before being submitted to the Province Leader along with any recommendations arising from the findings. The review is not based on a review of case material as during the relevant time period there were no allegations made against members of the congregation that were within the Terms of Reference. There also were no allegations in respect of other forms of abuse within the time period, in respect of deceased and living members of the congregation. The review therefore is primarily based on policies and procedures made available plus interviews with key personnel involved in the safeguarding process within the congregation, particularly in the services run by the congregation.

Introduction

The Sisters known as the Loreto Sisters belong to the Institute of the Blessed Virgin Mary (IBVM) founded in 1609 by a Yorkshire woman Mary Ward. The Order was originally established in continental Europe, and first came to Ireland at the beginning of the 19th century at the invitation of Archbishop Murray of the Archdiocese of Dublin, to provide catholic education for the people. The Loreto Sisters began their work in Rathfarnham House in Dublin in 1822, and subsequently established an extensive network of educational provision at both primary and post-primary levels. Although the involvement of the Loreto Sisters in education has changed over the years, it is still regarded as a primary ministry of the Province.

The Institute Leader is based in Rome, and is supported by a four person leadership team. There are nine provinces/regions globally, in Australia and East Timor, India, Kenya, Spain, Ireland and Southern Sudan, England, Canada, USA, Peru and Mauritius – each with its own province leader.

Role Profile (past and present role with children)

In the past all Loreto Sisters in Ireland were involved in either primary or secondary schools. In December 2007 the Province established the Loreto Education Trust, which is a separate company whose members have appointed a Trust Board to undertake (through the Loreto Education Centre based in Foxrock, Dublin) the management and governance of its portfolio of schools. The Trust Board has lay and religious membership. There are currently 18 Loreto secondary schools and nine primary schools in Ireland, and the Loreto Education Trust is also involved in the shared patronage of five community schools. All Loreto schools are subject to child safeguarding policies as required by the Department of Education and Skills. Loreto Sisters remain involved in education in a number of capacities – seven work with the Trust Board and the Education Centre; two are directly involved in full-time teaching; three are involved in school leadership (two as school principals, one as a deputy principal); Two Sisters are involved in 3rd level education with adults, nineteen serve on various Boards contributing to the governance of schools; and three are school chaplains, with a few Sisters involved in pastoral roles.

Outside their work with the Education Trust, Loreto Sisters do not provide direct services to children or young people. The Province has branched out into areas such as counselling, spiritual direction and parish work. Two sisters work in Dioceses, and others organize school and parish retreats. Two Sisters are involved in community development programmes in Tallaght, Dublin (which involve the administration of pre-schools).

Profile of Members

There are currently 211 Loreto Sisters in Ireland, the majority of who are elderly, with an average age between 60 – 70 years. In Ireland the Province Leader (currently Sister Helen O’Riordan, in an acting capacity) works with a four person leadership team. Loreto Sisters live in 40 locations in Ireland (the numbers in each location range from 1-23, with the bigger communities consisting of older members), and there are 14 community leaders, each co-

coordinating a cluster of placements. The Province Leader meets regularly (approximately three times per year) with community leaders, supplemented by individual meetings between the leadership team members and individual Sisters. The decision-making style within the Institute is participative.

Policy and Procedures Document

The Loreto Safeguarding Children Policy and Procedures 2014 were signed off in October 2014 by the Province Leader at that time, Sister Noelle Corscadden. There were previous policies dated 2007 and 2010, which have been reviewed and amended. The current policy is structured to address each of the NBSCCCI child safeguarding standards. It is a comprehensive document, with 101 pages including appendices and a resources section.

The policy states that the Loreto Sisters undertake to do everything in their power to protect and provide a safe environment for the young people to whom they minister and with whom they share their lives, and that every Loreto Sister, employee and volunteer must comply with it. It is clear about the need for immediate reporting to the civil authorities, and contains a flow chart for the reporting process and contact details of the Institute's two Designated Liaison Persons. The section on what to do when a child discloses is prominently positioned in the document. The policy sets out recruitment and vetting procedures, as well as codes of conduct, guidelines for the supervision of children and for children's activities, guidelines on intimate care (including disability) and a code of practice for working with children with disabilities. The section on disability is commended.

The Loreto Sisters have joined with the Sisters of Mercy Order to process vetting.

There are also guidelines for working with challenging behaviour, and a statement on the role of local safeguarding representatives. The policy states that all Sisters are offered child safeguarding training, and that no individual can work with children until basic awareness training has been completed. The DLPs are also accredited trainers with NBSCCCI.

Under the heading of communication, the policy which is on the Province's website (www.loreto.ie), is available in all Loreto houses. Work has also been done to communicate child safeguarding to children and parents, including notices for children and young people.

The policy provides for access for survivors/victims to advice and support, there is currently one person who receives support from the DLP; and mandates the Province to provide for Advisors in the event of allegations being made against members. The Province does not have an advisory committee, nor does it have current membership of the NBSCCCI Case Management Committee (NCCMC) on the basis that neither measure has been needed. The acting Province Leader advised that the Province maintains a close relationship with the NBSCCCI and would join the NCCMC if such circumstances were to arise.

The Province has a current safeguarding plan through which the Leadership team can monitor all aspects of policy implementation. The appendices to the policy include sections on definitions, internal procedures, guidelines for taking photographs, a (comprehensive) anti-bullying statement, and statements on confidentiality, data protection and equality and whistle-blowing.

In conclusion all aspects are covered in the Policy document; it is clear and easy to read as well as comprehensive.

Structures

The child safeguarding structures in the Province revolve around the two DLPs, both of whom have considerable experience of child safeguarding. In the houses, it is the community leaders who carry out the functions of local child safeguarding representatives. The Loreto Sisters have carried out a consultation process with their members about safeguarding, and there are self-audit records on file. As already stated basic awareness training is provided by the DLPs (accredited NBSCCCI trainers), with additional training sourced from the NBSCCCI. There is a child safeguarding training register to track attendance and needs for refresher courses etc. There is not a 'stand-alone' Safeguarding Committee, and the coordinating and monitoring functions are carried out via the regular meetings of the leadership team at whose meetings child safeguarding issues, when and if they arise, are discussed. This arrangement is feasible at present, given the size of the overall community and the absence of any substantive history of allegations.

Management of Allegations and liaison with the statutory authorities

There has been minimal contact between the Loreto Sisters and the civil authorities, due to the low incidence of relevant allegations. There have been nine allegations made against Loreto Sisters in all, none of which involved any allegation of child sexual abuse against any member of the Institute. Three of these were dealt with by the Residential Institutions Redress Board and were therefore outside the remit of this review. The reviewer read a sample of four of the remaining six files, all of which were general in nature. Three of these cases referred to the possibility of physical or emotional abuse but presenting information was not substantiated. In two of these cases the allegations were not specific to any member of the Institute, but to the complainant's experience of the Institute in general. There is evidence of very good and compassionate pastoral support to complainants in two of these cases. In the third case the files records that the HSE assessed the information as too vague to follow up. In the fourth case the allegation, made more than two decades ago, concerned child sexual abuse by a religious from another congregation against a Loreto pupil. The Institute, on legal advice, tried unsuccessfully to identify the alleged perpetrator, and informed the pupil's parents of the allegation and of the congregation to whom the alleged perpetrator belonged. The case was not reported to An Garda Síochána by the Loreto Sisters for another 12 years.

The child safeguarding files are well structured, and reflect the commitment of the Loreto Sisters to a caring approach to child safeguarding.

Conclusion

The review has established that the Loreto Sisters is a congregation which currently has only limited contact with children and families because of its declining size, age profile and strategic decision to transfer its services to the Loreto Education Trust. It has a good quality detailed safeguarding policy for children in place which evidences an ongoing commitment to

best safeguarding practice and which substantially addresses the NBSCCCI *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland* . There are no concerns about the management of cases, of whom none relate to sexual abuse against a member of the congregation.

Review of Child Safeguarding in the Catholic Church in Ireland

Terms of Reference

Small Religious Congregations

(which should be read in conjunction with the accompanying Notes)

Introduction

In order for the NBSCCCI to be able to state that all Church Authorities on the island of Ireland have been evaluated in respect of their child safeguarding policies and practices, both historical and current, then some form of appropriate assessment has to be conducted of every one of these. It is rational however that the form of assessment is tailored to the profile of each Church Authority, and that needless expenditure of resources and unnecessary interference in the life of religious orders and communities that have no children-specific ministry would be avoided.

This review seeks to examine the current arrangements for safeguarding children across small religious congregations /orders, and missionary societies in Ireland who have limited or no direct contact with children as part of the congregation's ministry.

It would also scrutinize practice within all known cases to ensure that they have been responded to appropriately.

The review's methodology is an adaptation of the methodology developed for all dioceses and large religious congregations and missionary societies, where the ministry involves regular contact with children.

The proposed review would consider the following:-

- (a) Former role with children
- (b) Allegations of child abuse against members and how these have been responded to
- (c) Existing relationships with statutory authorities such as the HSE, Gardai in the Republic and the HSCT or PSNI in Northern Ireland.
- (d) Policies in place and being applied for safeguarding children
- (e) Roles and responsibilities and where they exist the operation of Advisory Panels, and Safeguarding Committees

The objective of the review would be to confirm if there have been any allegations and how known allegations have been responded to; in addition the review seeks to confirm what the current arrangements for safeguarding children are. In particular, emphasis will be placed on establishing how policies and practice match up to the standards set down in *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland* published by the National Board for Safeguarding Children in the Catholic Church in Ireland and launched in February 2009. Priority, at all times, will be given to how policy and practice can be improved and strengthened. If policies and/or practices are identified that are concerning, inadequate, or dangerous, they will be addressed through the provision of guidance and support, and through the reporting of these situations to the appropriate statutory authorities, if this has not already happened. Similarly, those that are good examples

will be highlighted with a view to them being adopted comprehensively across all parts of the Church. All cases that relate to alleged or known offenders that are alive will be read and included in the review. In cases where the alleged or known offender is deceased, these will be sampled in an attempt to gather learning from them that will be used to inform the framing of recommendations.

Guidance Documents

The review will be guided by the following:-

- (a) *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland*
- (b) *Children First* Guidance in ROI; and Regional Child Protection Guidelines in Northern Ireland;
- (c) Legislation that exists in each jurisdiction which contributes to safeguarding children and young people.

The review will be undertaken by the National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI) through their National Office and led by the Chief Executive Officer.

The review process will be overseen by a Reference Group to whom the CEO will report on a regular basis. The membership of this Reference Group has been drawn from each of the statutory child protection agencies in both jurisdictions, along with eminent individuals in the field from academia. The current Reference Group consists of: Dr Helen Buckley (TCD); Mr Paul Harrison (Tusla), and John Toner (SBNI).

It is important to confirm that the value of the review is dependent upon full and complete access to all relevant documentation and information relating to the abuse of children known to the individual Church authorities. The review will proceed on the basis that willingness exists on the part of each of the subjects of the review to provide full access to the fieldwork team, subject, where relevant, to the terms of the Data Processing Deed agreed between the Sponsoring Bodies and entered into between the parties hereto.

Step Guide to the Review Process

Step 1.

A letter of invitation to review is sent by the Provincial/Regional Superior or other person responsible for the congregation/ order or missionary society (hereinafter referred to as 'the Ordinary').

Step 2.

The CEO will forward a survey to the provincial which will identify:

- Current number of members
- Past role with children
- Current role with children
- Total number of allegations received up to 2014
- Number of living members against whom there are allegations

Step 3.

For any Order where there have been allegations a full review will proceed, as per step 4 - 23. For those Orders where there have been no known allegations a desk top examination of policies and procedures will take place followed by a site visit to interview all relevant personnel within the safeguarding structure. For these orders step 5 and 13-23 will apply.

Step 4.

The CEO and Ordinary will confirm the dates for the fieldwork for the review, and names of the fieldwork team.

Step 5.

The Church Authority will be asked to make available all of the case files and related documentation in respect of any safeguarding concerns that have been identified within the diocese. The Church Authority will make available a room with wireless internet access for the reviewers to conduct their review of files, so that any records made by the reviewers can be directly typed and stored onto a secure server which is only accessed by the reviewers. In the absence of internet access the reviewers will type their notes onto a secure encrypted USB stick for later uploading onto the secure server.

Step 6.

The Church Authority will be requested to sign the revised Data Processing Deed prior to the arrival of the team.

Step 7.

The Church Authority will arrange a schedule of interviews with all who hold safeguarding roles within its functional area. The designated person and the Church Authority will be available to the reviewers throughout the period of fieldwork.

Step 8.

The fieldwork team when they arrive on site will firstly confirm that they have a suitable place to work in and that all the required documentation has been provided to them for their review. In the event that the fieldwork team forms the opinion that the Church Authority has not provided access to all such documents, the NBSCCCI shall give notice in writing to the Church Authority of the opinion of the fieldwork team and such notice shall specify the reasons for same. Thereupon, the Church Authority shall respond in detail to the notice. Each party shall use its best endeavours to resolve any differences of opinion which shall arise and, in the event that resolution is not arrived at, the parties will attempt to resolve the dispute by recourse to the services of a mediator agreed between them or nominated for the purpose at the request of any of them without prejudice to the NBSCCCI's entitlement to terminate the review. In the event that resolution has not been arrived at following mediation, either party shall be at liberty to terminate forthwith the review.

Step 9.

On arrival, the fieldwork team should be supplied with a single case file index that lists all the cases that have been created within the diocese. These may be divided into two groups. The first group will contain all allegations that relate to living alleged or known perpetrators. The second will contain any that are deceased.

Step 10.

Depending on the volume involved a decision should be made as to whether all or a random sample of the "deceased group" should be reviewed. Care should be taken to include all prominent cases in the sample.

Step 11.

Each case file will be reviewed by each fieldworker independently in the first instance. They will create a written summary with chronological information of the case. In certain cases a second reader may be required, this will be discussed and agreed between the fieldworkers.

Step 12.

Following the reading of the case and the creation of a summary, the fieldworkers will analyse and assess the actions taken in the case. They will assess compliance with agreed Church policy that was extant at that time. They will also indicate whether any current risk exists in respect of the information contained within the file and advise the church Authority of necessary safeguarding action to reduce the risk.

Step 13.

When all the case files have been read, the fieldwork team will then examine and review any procedures or protocols that exist within the diocese to confirm that they are in compliance with the *Safeguarding Children: Standards and Guidance* document issued by the NBSCCCI in February of 2009.

Step 14.

To complete the review, the fieldwork team will then seek to speak to those directly involved in the safeguarding structure in the diocese. This should include the Advisory Panel, a sample of parish safeguarding representatives, the designated person, the safeguarding committee, victim support and advisors and the Bishop/Provincial. The purpose of these interviews is to form a view of the competence and effectiveness of the safeguarding structure that exists within the Church Authority.

Step 15.

The fieldwork team will also seek to speak to representatives of the key statutory agencies to provide them with an opportunity to express their views on the quality of the working relationships that exist between them and the Church Authority.

Step 16.

A verbal feedback session on initial key findings will be given to the Church Authority.

Step 17.

Upon completion of the field work, the team may request to take materials – other than casework records to review off-site; this alongside all materials gathered by the reviewers, including written notes on cases and meetings, will be analysed and will form the basis of the draft assessment review report.

Step 18.

The draft will be forwarded to the Church Authority for factual accuracy checking.

Step 19.

Alongside all other reports under review, the report will be presented in draft to the Reference Group for their critique and comment. If further work is required at the direction of the Reference group the CEO will ensure this work is completed and advise the Church Authority accordingly.

Step 20.

The report will be legally proofed by NBSCCCI lawyer.

Step 21.

The report will be forwarded to the NBSCCCI for approval

Step 22

A final draft report will then be submitted to the Church Authority. The expectation would be that the report will be published by the Church Authority at an agreed time in the future.

Step 23.

All case material written, including summaries, as part of the review, which are for the reviewers use only, will be stored on a secure server.

Guide for Reviewers

In terms of small (female religious orders) reference should be made to the following:

1. Has the Order provided alternative care to children in an orphanage, industrial school or children's residential home, but no longer is engaged in running such services;
2. Has the order provided education to children, in both or either boarding schools and day schools, but no longer does so ;
3. Has the order provided medical and/or nursing services to children, but no longer does so;
4. Has the order provided any other services to children, in community services centres, youth clubs etc., and no longer does so;
5. Does the order currently provide any sort of service to children and families that brings them into regular contact with children;
6. Has the order never provided any service to children (e.g. contemplative orders).

In relation to category 1 above;

1. The reviewers will establish whether any service they provided is included in the list of children's residential services produced by the Residential Institutions Redress Board (RIRB);
2. If this is the case, reference should be made to this.
3. If complaints have been referred to the Redress Board or Ryan Commission, this review cannot access these records and that will be stated in the report.
4. If the order has received complaints which have not been processed through Redress or Ryan these cases will be thoroughly examined as detailed above.

Review of Policy and Procedures

1. It is recognised that not all Orders will have any ministry with children and therefore their policies and procedures should reflect the work that they do with children.
2. If the Order only works through other organisations, example in Diocesan work or in schools, they are required to follow the policies of those organisations.
3. If there are gaps in the policy document an assessment should be made as to whether the ministry engaged in requires full compliance with all criteria attached to the seven standards
4. Where it is clear that the criteria do not apply a reference should be made at the beginning of the review report that the Order's ministry is not directly with children and therefore adherence to particular criteria do not apply.
5. If the Order is a contemplative Order, there is no expectation that they will have detailed policies and procedures, but reference should be made to their ministry and that they have no contact with children.
6. In all cases, contact will be made with the civil authorities to identify if they have any child safeguarding concerns in relation to the order.