

# Review of Child Safeguarding Practice in the religious congregation of

# The Sisters of Charity of Saint Paul the Apostle

undertaken by

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

Date 30<sup>th</sup> April, 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. In the case of the Sisters of Charity of Paul the Apostle there has been one allegation against a Sister, now deceased and the congregation were involved in a litigation claim, initiated by a complainant who stated that he was abused by a priest while in the education and care of the Sisters. Both these case files were examined and will be commented on in the body of the report. The ministry engaged in by the congregation with children, has significantly decreased, as they no longer provide any direct services; some sisters are employed or volunteer with children through other organisations where the child safeguarding policy of that organisation is observed.

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 Child Safeguarding Practice within the religious congregation of Sisters of Charity of Saint Paul the Apostle* undertaken by the NBSCCCI in line with the request made to it by the Sponsoring Bodies.

The fieldwork for the review took place on 29<sup>th</sup> April, 2015, this included full examination of case files, review of policies and procedures and interview with the Congregational Leader and designated liaison person for Ireland.

The findings of the review have been shared with a reference group before being submitted to Sister Kathleen Neenan, Congregational Leader along with any recommendations arising from the findings. The review 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. The review also considered case material, as during the relevant time period there was an allegation made against a member of the congregation that was within the Terms of Reference.	

#### 1. Introduction

The Sisters of Charity of Saint Paul the Apostle were founded in 1847 by Sister Geneviève Dupuis in Banbury, Oxfordshire. Sister Geneviève Dupuis opened many convents throughout England, and planned to open a convent in Ireland, before she died on 25th September 1903. Inspired by Sister Geneviève, the Sisters sought to live the Gospel in friendship and solidarity with others, using their resources to promote justice and wholeness.

The Sisters' mission in England initially was in staffing parish schools, parish visiting and teaching the Faith to adults. In Banbury Sister Genevieve opened night schools for children who were working during the day. The educational work of the Congregation underwent vast expansion in the twentieth century.

In 1903 The Sisters of the Congregation established their first presence in Ireland in County Limerick, where they were invited by Bishop O'Dwyer to provide education for girls in more remote areas of his diocese. In 1927 the Sisters came to Kilmallock and in 1960s the Sisters established schools in Dublin in Greenhills.

The Sisters of St Paul the Apostle also minister in South Africa and in Romania.

From their beginnings the Sisters became involved in primary and later in secondary education. The Sisters were also involved in caring for orphaned children in England and in Ottawa Canada. In addition they ran an orthopaedic hospital in Coleshill as well as caring for the elderly and sick sisters at Selly Park nursing home in Birmingham. In later years the Sisters moved into adult education, and a teacher-training college was established in Selly Park in 1910. The college evacuated to Woodchester in Gloucester at the outbreak of the Second World War. After the war, the college moved to its final site in Newbold Revel, a stately home in rural Warwickshire. This facility is no longer run by the Sisters.

The Mother House is located in Selly Park in Birmingham and the Sisters now minister in England, Scotland, Ireland, South Africa and in Romania. The Mother House also contains an Infirmary for those Sisters in need of care.

Worldwide there are 140 Sisters, fifteen of whom live and minister in Ireland. The profile of the congregation is of an aging population, average age is 75 with a number of the Sisters requiring care and medical support.

#### 2. Role Profile (past and present role with children):

Traditionally the Sisters of Charity of St Paul the Apostle were educators of marginalized children, either because the children were working during the day in the potteries or coalmines in England, or as was the case in Ireland, where girls had limited access to second level schools, which were mostly located in towns. In England and other parts of the world, the Sisters also worked in medical care.

In Ireland the Sisters work alongside lay colleagues, women and men who share their vision, and their way of living out their commitment to being a Sister of St. Paul. The emphasis is mainly, but not exclusively on education. Current ministry includes:

- Trusteeship Management of schools
- Teaching
- Pastoral Care

- Care of the elderly
- Visiting the elderly in Nursing Homes
- Parish ministry
- Meals on Wheels
- Working in addiction centre
- Amnesty International
- Spirituality
- Prayer Group
- Hospital Chaplaincy

Most of this ministry is with adults, supporting them in their vocations as teachers or offering pastoral support.

In Ireland the Sisters live in five locations: Kilfinane, Kilmallock, Greenhills, Rathgar and Terenure

The Congregation's first community in Ireland was established in Kilfinane, County Limerick, where the Sisters opened a convent in October 1903. Their intention was to take over the national school, to establish a secondary school and to undertake visitation of the sick. The Sisters continued teaching in the Primary School until 1996 when a lay principal was appointed. A new primary school was opened in 2014. The secondary school, Scoil Pól, was added in 1928 and boarding facilities made available as the pupils were drawn from a large area. The school became co-educational in 1968 and a new school was built in 1987. Sisters continued to work in the school as teachers until 2014. One of the Sisters works as a teacher in the Primary School in Croom. Presently there are Sisters on the Board of Management of the Secondary School and also work in parish ministry and voluntary organisations.

In Kilmallock, County Limerick, in 1927 Canon (later Archdeacon) Begley invited the Sisters to provide primary and secondary education for girls. One of the Sisters became the Principal of St Peter and St Paul Girls' Primary School in Wolfe Tone Street. In this school, boys and girls shared the same building with boys being educated on the ground floor and the girls upstairs. A new school was built in 1929, named Scoil Ui Eilí agus Uí Ruairc. A secondary school for girls was opened the following year. A vocational school was opened in Kilmallock in September 1964, this later became co-educational. In 1966 a new primary school for boys – St Peter and St Paul was opened. In 1998 both second level schools amalgamated to become Coláiste Iosaef, under the Vocational Educational Committee with three representatives from the congregation on the Board of Management. In 2004 both the girls and boys schools amalgamated and formed Scoil Mocheallóg. There are no Sisters from the congregation teaching in any of these schools and their role is either as members of Boards of Management or in a support capacity with the teachers. There are two nursing homes situated in Kilmallock where the Sisters visit and offer pastoral support. Today one of the Sisters is involved in the alcohol and drug recovery unit based in Cuan Mhuire, Bruree.

The Sisters were invited to work in Blackrock College, Dublin, to supervise the kitchen, the infirmary, the linen room and the dormitories. This apostolate continued until 1995.

In 1956, the Sisters established a residence in Bushmount, Clonakilty, to care for elderly priests initially. Over the years it developed and was registered as a Nursing Home catering

for men and women as well as retired priests. The Sisters withdrew from this ministry in 2009 and the Nursing Home continued under new ownership.

In 1964, a girls' primary school and a voluntary secondary school for girls were established on the outskirts of Dublin at Greenhills, to serve the needs of the growing population in suburban housing estates. A convent and church were built on the campus. Both schools became popular so extensions were soon necessary. A lay principal was appointed to the secondary school in 1993 and in the primary school in 2014. The Primary school is being transferred to the Diocese and the Secondary school has been transferred to the 'Le Chéile Schools Trust'.

As well as being involved in education the Sisters have always been involved in visiting and supporting families in the parishes in which they live. They have supported and helped the sick and offered pastoral support to those bereaved.

# 3. Profile of Members:

In Ireland fifteen sisters live in five communities, in County Limerick and in Dublin. One Sister currently holds a teaching position in a primary school in Croom, County Limerick. One Sister retired as principal of a school in County Limerick in 2012 but continues to offer pastoral support and guidance to the current principal and teachers in that school. Five Sisters hold positions on Boards of Management of schools. In all a total of six sisters volunteer in schools as support for the teachers and lay staff. Others work in administration or in archiving. One Sister is a chaplain in St Vincent's Hospital in Dublin and another Sister works at Cuan Mhuire, Bruree. Many of the Sisters volunteer in parishes supporting faith development through liturgies, choirs and other adult services.

All Sisters who have ministry with children are vetted, either though the school, the parish or organization in which they minister. Equally, they follow the child safeguarding policy and procedures of the organisation in which they work.

# 4. Policy and Procedures Document:

The Safeguarding Children Policy and Procedures of the Congregation of Sisters of Charity of St Paul in Ireland is a very comprehensive 89 page document. It is laid out in line with Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland 2009, setting out how the Sisters will follow each of the 7 standards. The policy and procedures refers to the requirement for all Sisters to follow the procedures and has clearly laid out definitions of abuse, reporting requirements and legislative and policy context.

Under reporting requirements and contained as a separate poster is information regarding the civil authority agencies, An Garda Siochana, and TUSLA (Children and Family Agency) as well as contact details for the designated and deputy designated person. There is an emphasis on care of the complainant and the respondent. The reviewer was advised that the Sisters keep contact details of the DLP and the civil authorities beside the telephone, in the event of receiving an allegation.

There is a section on *Whistleblowing*, in the event of being unhappy with how care is delivered.

Within Standard 3 there are clear guidelines on recruitment, vetting, codes of behavior. In spite of the fact that the Sisters do not have responsibility for the intimate care of children with disabilities, there is a short section which references this.

Standard 4 details training, while Standard 5 outlines communication, again recognizing that the Sisters do not provide any services to children. In practical terms, the designated person has attended training and conferences with the NBSCCCI in Ireland and generally keeps herself apprised of developments, as does the Congregational Leader, Sr. Kathleen Neenan. The reviewer was advised that child safeguarding is discussed at team meetings and congregational gatherings and the newsletters and information from NBSCCCI are circulated so that all Sisters can keep up to date with developments.

The final two standards are also detailed within the policy document. Finally there are detailed appendices relevant to the task of delivery good childcare practice.

Overall the reviewer was impressed with the interest and commitment shown, not just within the written policy document, but also from discussion with the Congregational Leader and designated liaison person. In evidence was a strong desire to do the right thing, prioritise the care and well-being of children, as well as providing a pastoral response to anyone who has been harmed as a result of child abuse.

#### 5. Structures

The Congregational Leader is Sr. Kathleen Neenan; she is responsible for the Sisters and their ministries worldwide. Sr. Kathleen has been in role for 5 years and will continue as leader until their next Chapter in 2016. Sr. Kathleen liaises with the Catholic Safeguarding Advisory Service in England and finds them very helpful. In the congregation there is also a safeguarding co-ordinator and in Ireland there is a designated liaison person. As already stated this person has attended training in Maynooth and is keen to maintain a positive working relationship with NBSCCCI, in the event of needing to access support and advice. The DLP is very competent and has a long background in working with children and was a school principal until her retirement.

# 6. Management of Allegations and liaison with the statutory authorities:

The reviewer examined two cases which involved the Congregation of the Sisters of Charity of St Paul.

Case 1 relates to an allegation of sexual abuse against a Sister who has since deceased. Upon receiving identifying information about the respondent Sister, the Congregational Leader at the time took all appropriate steps. Legal advice was sought and the civil authority agencies were informed. Advice was sought from the Advisory panel and a preliminary investigation was initiated. The Gardai did not proceed with an investigation and the preliminary inquiry did not result in a finding. The respondent Sister had stepped aside from her role. The complainant was offered considerable support by way of counselling, pastoral and health care support. The file was very detailed and easy to follow, set out in date order.

The reviewer is satisfied that the actions and steps taken by the congregation were appropriate, and it is interesting to note that this process was undertaken before any Church guidance was in operation in 1996, and long before *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland* was adopted by the congregation in 2009. However, it would appear from the records that the complainant did tell others, including a priest, a spiritual director and her therapist before informing the Congregational Leader. The process of conducting the preliminary investigation appeared to take a long time and did not result in a finding which could have brought a resolution to the case before the respondent Sister died. The reviewer commends the Congregational Leader in role at the time, for her compassionate management of the case.

The second case file examined during the review related to an allegation of abuse against a priest while the complainant was at school with the Sisters of Charity of St Paul the Apostle. The claim against the Sisters was one of negligence. The respondent priest was deceased when the allegation was notified and therefore there was no risk to children. In child safeguarding terms there was no active role required by the congregation.

# 7. Conclusion:

The Congregation of Sisters of Charity of St Paul the Apostle are declining in numbers, have an aging profile and a very small presence in Ireland, with only 15 Sisters still in ministry. In spite of that, the reviewer was very impressed with their commitment to and interest in child safeguarding. Their background in providing education for marginalized children is reflected in their current attentiveness to caring for and protecting children. There is warmth and compassion towards others demonstrated verbally during the review and in the detailed records relating to the two cases examined by the reviewer.

The policy framework and procedures are very detailed and well written and cover all the aspects of child safeguarding as required under the Catholic Church in Ireland's safeguarding standards. The relevant safeguarding personnel keep alive the issues relating to child safeguarding through attending training, liaising with safeguarding personnel in the Catholic Church in England and in Ireland and through sharing and providing briefings for all the Sisters.

The cases examined were managed appropriately and compassionately, with a real sense of the sadness of child abuse and its damaging consequences.

The reviewer commends their work in child safeguarding.

# Review of Child Safeguarding in the Catholic Church in Ireland <u>Terms of Reference</u>

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.