



THE NATIONAL BOARD FOR
SAFEGUARDING CHILDREN
IN THE CATHOLIC CHURCH

**Review of Child Safeguarding Practice
in the religious congregation of**

The Ursulines of the Irish Union

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

Date: July 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 child 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 in the religious congregation of the Sisters of the Ursulines of the Irish Union* 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 Ursulines of the Irish Union, along with any recommendations arising from the findings.

The review also involved a review of case material contained in three case files. These were created during the relevant time period covered by the review; but on examination did not contain allegations made against members of the congregation that were within the Terms of Reference of the review. These were historical in nature and no risk management issues required examination.

The review is also based on policies and procedures made available plus interviews with key personnel involved in the safeguarding process within the congregation.

Introduction

The congregation was established in Brescia in Italy in 1535 by Angela Merici, making it one of the older female religious congregations. The original model adopted by Angela Merici was as a Company of St. Ursula, which did not involve these women living in traditional convents, but rather remaining at home in their local communities. Over time the congregation became a monastic one; and eventually it developed into a more recognizable religious congregation. It is part of the philosophy of the congregation from its beginnings that no physical chastisement is used with children, but that any necessary correction is provided “with love and charity”.

Angela Merici chose St. Ursula as the patron of her new community of religious women as a model of female courage and resilience; Ursula had been martyred in Cologne in or around the year 383. Angela Merici was herself canonized in 1807 by Pope Pius V¹¹.

In 1771, Nano Nagle invited the Ursulines to Ireland due to their well established reputation as educators of girls. The Ursulines first settled in Cork, in 1771; and they then made further foundations in Thurles (1787), Waterford (1816), Sligo (1850), and Dublin (1962).

The individual foundations were independent of each other, but over a number of decades and through a lengthy process of consultation (from 1914 to 1978), they finally came together to form a united Congregation, hence the reference to the *Irish Union* in the congregation’s name.

In 1948, at the invitation of the local bishop of the Welsh diocese of Menevia, Sisters from Thurles, Waterford and Cork went to Brecon in Wales to establish a school there; and they were soon joined by Sisters from the Sligo foundation. Two schools, St. Joseph’s Primary and St. David’s Secondary Boarding School for girls operated in Brecon under the auspices of the congregation until their closures in 1996 and 1993 respectively. The congregation still has Sisters in Brecon who are involved in a variety of community ministries, all of which have a strong ecumenical dimension.

In 1957, Sisters from the Sligo foundation went to Kenya; and the Sisters of the Irish Union are now involved in education in four Kenyan dioceses. Ireland, Wales and Kenya are the three countries in which Sisters of the Ursulines of the Irish Union live and work.

The Ursulines of the Irish Union are separate from the much larger international Ursulines of the Roman Union, but both have the same roots. There is ongoing positive communication between both congregations.

This congregation is different from and separate to the Ursulines of Jesus, which was founded in France in the 18th century.

Role Profile (past and present role with children)

The Ursuline Sisters are involved as Trustees of four primary schools in the Republic of Ireland: Scoil Ursula, Blackrock, Cork (www.scoilursula.scoilnet.ie), Scoil Ursula, Sligo (www.scoilursula.com), Scoil Angela, Thurles, Co. Tipperary, (www.scoilangela.ie) and Scoil Ursula, Waterford (www.ursulineprimary.ie).

The congregation also acts as trustee of five second level schools: St. Angela’s College, St. Patrick’s Hill, Cork (www.stangelacollege.ie), Ursuline Secondary School, Blackrock, Cork (www.ursulinecork.com), Ursuline College, Sligo (www.ursulinecollegesligo.com), Ursuline Secondary School, Thurles (www.uct.ie), and St. Angela’s Secondary School, Waterford (www.ursw.ie). In addition, the Sisters are represented as co-Trustees, along with the Archbishop of Dublin and the County Dublin ETB, of Cabinteely Community School, Dublin 18 (www.cabinteelycs.ie), which school the Sisters had established in 1962.

The Ursulines still own and operate the Ursuline Boarding School, Thurles, Co. Tipperary (www.uct.ie/school/boarding-school); and they also own and operate St. Angela’s Academy of Music in Thurles (www.uct.ie/school/music-academy); these are on the same campus as and are attached to the Ursuline Secondary School in Thurles.

The other educational facility that the congregation founded in Ireland is St. Angela’s College, Lough Gill, Sligo, which is a recognized third level college. The college is at present managed by the Board of Directors of St. Angela’s Company, Sligo, one of the sisters is a Board member. It is in the final stages of amalgamation with NUI Galway when it will come under the authority of NUI Galway Udaras.

Profile of Members

There are 97 members in total in the Ursuline Irish Union, 65 of who are Irish and are in Ireland (60), in Wales (4), and in Kenya (1); and the balance of who are Kenyan Sisters and novices.

The age profile of the Irish Sisters is quite different from the Kenyan members of the Congregation, with the average age of the Irish Sisters being 77.5 years. The age range of the Irish Sisters is:

50 – 60 years (3 Sisters); 61 – 70 years (10); 71 – 80 years (27); 81-90 years (24); and 91 years and over (3).

In comparison, the Kenyan members of the Congregation range in age from 26 years to 50 years of age.

The active Sisters in Ireland are involved in a range of ministries, as follows:

Ministry	Number of Sisters
Principal, Second Level	1
Teaching – part-time	1
School chaplaincy – part-time, retired	2
Home-School Liaison – part-time, retired	1
Helpers in school – part-time, retired	6
Education Officer	1
Head of Boarding School	1
Head of School of Music	1
Music lessons	2
School Boards of Management - secondary	6
School Boards of Management - primary	2
St Angela’s College, Sligo, part-time, retired	1
Parish Sisters	2
Diocesan Pastoral Development Officer – full-time	1

Choir	3
Counselling and Psychotherapy	2
Spiritual guidance	6
Retreat centre	3
Samaritans	1
Prison chaplain	1

The Congregation also has a number of **Ursuline Commissions**, including Justice and Peace; Women’s issues; Education; The Ursuline Network; Vocations Promotion; and the Pastoral Group.

The Sisters in Ireland live in a number of locations across five counties, as shown in the table below.

Location	Number of Sisters
Dublin - Generalate	2
Dublin – house 2	2
Dublin - house 3	2
Dublin – apartment 1	1
Cork – house 1	9
Cork – house 2	1
Cork – apartment 1	1
Thurles	9
Waterford – house 1	9
Waterford – house 2	2
Waterford – House 3	2
Sligo – House 1	12
Sligo – House 2	4
Sligo – House 3	1
Athlone	3

Policy and Procedures Document

The *Ursuline Sisters in Ireland Policy and Procedures on Child Safeguarding* was adopted by the Congregation’s Leadership Team and signed by the Congregational Leader on 12/11/2013, and is to be reviewed on 12/11/2015. The reviewer saw copies of the two previous documents of 2009 and 2011. This 67-page document is very comprehensive and is consistent both with *Children First* (2011) and with the *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland*. The full document can be accessed and downloaded from the Congregation’s website, at www.ursulines.ie/?s=child+safeguarding.

In November 2014, the DLP of the congregation sent out a circular to all Sisters in Ireland asking that the congregation’s *Child Safeguarding Policy Statement* would be displayed in a suitable public location in their residence and asking that a declaration that this was done would be signed and returned to her.

That policy statement reads as follows:

The Congregation in collaboration with their lay colleagues strive to bring alive with new intensity God’s message of unconditional love and its invitation to service in the context of each new era.

We value and encourage the participation of children in any of the Congregation's ministries that enhances their spiritual, physical, emotional and social development.

We recognise the dignity of all children and are committed to trying to ensure their protection and support.

We will strive to do all in our power to create a safe environment for children in order to try and secure their protection and enable their full participation in the life of the Church.

To reinforce the child safeguarding message, the DLP circulated information on *Best Practice with Children* from *Children First* to be discussed by the Sisters at meetings in all of the congregation's community houses, in late 2014 – early 2015. Each community house had to return a signed declaration to confirm that these meetings were held.

Under Standard 5 – How our Safeguarding Policy and Procedures is promoted, the following are listed:

- Distribute to all communities and co-workers
- All separate ministries to have their own document – Boarding School, School of Music
- Parents and guardians to be made aware of documents
- Two-year review – audit
- Documents on website
- Policy displayed in places of ministry and in all community houses

This is commended.

In addition to the main congregational policy for Ireland, the Ursulines also have specific child safeguarding policies for the boarding school in Thurles and the music academy in Thurles.

The Thurles boarding school has a child protection policy 2014, which includes a Policy Statement, a handbook for staff, a Safe Recruitment and Vetting Policy, a Job Application Form template, a Statutory Declaration Form template, and circulars containing policy and procedures updates.

There are 130 female students in the boarding school. The reviewer saw on file a letter of 12/06/2015 from the Sister in charge to all parents, setting out the supervisory arrangements for all activities in the boarding school.

The policy and procedures for the Thurles School of Music file that was examined contained a policy statement and contact details for display; A Health and Safety Statement; the Child Protection Policy, ratified on 29/08/2014; pro-forma permission slip for trips, outings, concerts etc.; the Complaints Procedure for Parents and Children; Pro-forma Record of Disclosures, concerns and suspicions; follow-up form for what was done with disclosures etc.; a Teachers' Handbook; Job Application Form template; Statutory Declaration Form template; and Employment Contract template.

The Sisters who work in schools are responsible for practicing under the relevant Department of Education and Skills Child Protection Policies, and the Sisters who volunteer in parishes are responsible for following the relevant diocesan child safeguarding policy.

The congregational website also contains information under the heading, *Reporting Safeguarding Concerns*, which states that:

If you are concerned about a child or vulnerable adult, please report your concern to any of the following:

Designated Delegate for the Ursulines – name and contact numbers

Designated Delegate for Archdiocese – name and contact number

The Health Service Executive – contact number

An Garda Siochana – contact number

Towards Healing Counselling – contact number

On June 12th, 2015, the congregation placed a notice on its website announcing the NBSCCCI review of child safeguarding practice and inviting anyone who had a child safeguarding concern to make contact with the Ursulines' DLP or with the NBSCCCI or with the Gardai or with Tusla.

All of the initiatives described above are commended.

Further development of child safeguarding within the congregation can be assisted through the implementation of the following Recommendations.

Recommendation 1

That the Congregational Leader arrange for the Congregation's website to be made more accessible to anyone who is seeking information on Child Safeguarding by having a clear link on the home page to a dedicated Child Safeguarding page.

Recommendation 2

That in addition to the display of the Congregation's *Child Safeguarding Policy Statement* in a suitable public location in every community house, the DLP ensures that the full contact details for the local Tusla Office, the Gardai and the local Diocesan Safeguarding Office are also displayed in the same place.

Structures

The Ursuline Irish Union has a Community Leadership Team of Five Sisters, which includes the Congregational Leader and the Designated Liaison Person, both who were interviewed as part of this review. This management team also acts as the Child Safeguarding Committee within the congregation, which oversees and coordinates the development and updating of policy and procedures and their communication and implementation.

The Designated Liaison Person has attended a number of relevant training days, 11 in all, since her appointment in 2011. She also keeps a training record of Sisters whose ministry brings them into contact with children, using the following format:

Name	Nature of involvement with children	Have you trained in Child Safeguarding?	What year?	Who provided?	Who works with you?	Organisations you are involved in

Training is to be done through inputs at assemblies, and by Sisters attending NBSCCCI's and Tusla training, as appropriate.

The reviewer had access to the file of Garda vetting forms which have been processed for all Sisters, except two who are in full-time nursing care. The congregation received assistance from the Archdiocese of Dublin with this vetting task.

The congregation has an Advisory Panel in place if required – it has not been used thus far; this is composed of three Sisters (Provincial, DLP and previous DLP), two (female) psychologists and a male psychotherapist.

The Ursulines adopted a Child Safeguarding Plan at their Leadership Team meeting of 13/06/2015; and child safeguarding is to be a regular item on General Leadership Team agenda. At that meeting an undertaking was given to undertake annual audits of child safeguarding across the congregation's ministries and community houses. The first audit will take place in 2016.

A draft policy for children visiting community houses is going through a consultation process with a view to introduction later this year.

The reviewer discussed with the Congregational Leader and the DLP the situation of two Sisters who provide one-to-one piano lessons to children, and guidance from the NBSCCCI was provided. The arrangements that are in place, which include signed permission to attend slips from parents, are satisfactory.

Although not within the remit of the NBSCCCI, it is of interest that the congregation has also developed a Kenya Policy and Procedures for Child Safeguarding in May 2011, which was reviewed in 2013 and updated in 2015 in the six communities where the Sisters live and teach in that country. The Irish based DLP also takes responsibility to keep child safeguarding on the agenda of the Sisters in both Wales and Kenya.

Management of Allegations and liaison with the statutory authorities

Prior to the visit of the reviewer to the Generalate Office of the congregation in Dublin, the Congregational Leader had made the NBSCCCI aware that there were files on three allegations that had been received since 2009.

The reviewer read all three files fully. All had been appropriately managed and notifications to the statutory child protection agencies have been made. One did not refer to any suggestion of sexual abuse; the second related to a student who had disclosed familial abuse; and the third was clearly unreliable, as the complainant had never been a student in the school in which she alleged that she had been abused.

On the basis of the evidence contained in the case files examined no member of the congregation, living or deceased, is the subject of a child safeguarding concern, suspicion or allegation.

Conclusion

The Sisters of the Ursulines of the Irish Union have declining involvement with children and young people in Ireland. They have the structures, policies and processes in place that are required to safeguard the children and young people they do have on-going contact with. The current General Leadership Team shows a knowledge of and commitment to good child safeguarding practice. Recommendations have been made to further enhance the effectiveness of this practice.

Review of Safeguarding in the Catholic Church in Ireland

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

Small Religious Congregations

Introduction

In order for the National Board 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 Congregations 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 matches up to the standards set down in the Safeguarding Children Guidance published by the National Board for Safeguarding Children in the Catholic Church 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;
- (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 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 Board 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 Board'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 National Board 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. In 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.