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QUALITY ASSURING COMPLIANCE WITH THE STANDARDS

7.3A Guidance on Reviews Carried out by NBSCCCI

Summary Review Methodology

The second phase of child safeguarding Reviews will seek to assess the practice of all Church bodies which hold a Memorandum of Understanding with the NBSCCCI, against the Standards set out in *Safeguarding Children, Policy and Standards for the Catholic Church in Ireland 2016*.

While for continuity the Review will be informed by the previous Review conducted by the National Board for Safeguarding Children in the Catholic Church in Ireland (the National Board), it will however mainly concentrate on developments in child safeguarding within the Church body since 2016. Given that all those who hold a MOU have signed up to the One Church Policy, emphasis will be on examining the implementation of the Standards in practice, rather than on simply surveying written procedures and guidance.

As with any review of practice there are particular aspects that the reviewers will seek to assess including:

- Good governance;
- Compliance with legislative and regulatory requirements;
- Compliance with the Church's safeguarding Standards;
- Role understanding; individuals' contribution to safeguarding; and team effectiveness;
- The safe engagement of children and young people in Church activities;
- Effective and compassionate engagement with complainants and respondents.

New elements

The Findings reached will refer to child safeguarding practice in general, rather than to a single instance where an error of judgment or mistake occurred.

Recommendations will only be made where it has been found that the Church body is not compliant with the Standards. Suggestions for continuing improvements in practice may, however, be made.

Reviewers will be recruited and selected with the involvement of the Sponsoring Bodies; they will be trained and supervised by the National Board; and they will work in accordance with a Code of Practice.

Quality assurance has been enhanced by not having staff of the National Board conducting Reviews. They will however ensure that the Standards are interpreted and applied by the reviewers in a consistent and even-handed way.

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Process of Review

1. Pre-Review:

- A letter of invitation to review is sent by the Church authority to the CEO of the National Board requesting a meeting to discuss commissioning a Review.
- At the subsequent meeting (Stage 1) the Church authority (or their nominee) and the CEO (or their nominee) will agree:
 - what Type the Church body is (Type 1, Type 2 or Type 3 according to Safeguarding children-Policy and Standards for the Catholic Church in Ireland 2016);
 - against which Standards and their supporting Indicators will performance and compliance be examined and measured by the Review;
 - that the Data Processing Deed will be signed by the Church authority and the CEO of the National Board before any Review activity can be commenced;
 - who will act as the link person (most likely the DLP) between the Church body and the National Board for the purpose of communication about the arrangements for the Review;
 - what written information is to be supplied to the National Board in advance of the fieldwork element of the Review;
 - when the Review will commence, and when the stages of the Review will be conducted, including the fieldwork visits;
 - who will conduct the Review (all reviewers will be properly recruited, trained and police vetted);
 - who the reviewer(s) will want to meet and interview;
 - if the Review is to examine Case Management (Type 1 and Type 2), to which case management files the reviewers will need to have access;
 - who the contacts are in the relevant statutory agencies, Police and Social Services.
- The lead reviewer will make contact with the nominated link person in the Church body to ensure that all required information is made available by the Church body in the format requested, before the fieldwork visit(s) can take place. In relation to the Case Management element of the Review, the Church authority will be requested to ensure that all of the case management files and related documentation are prepared and will be made available to the reviewer(s).
- The lead reviewer will make contact with the nominated link person in the Church body to agree a timetable for the fieldwork visit(s), to include an agreed schedule of meetings, interviews and site visits. The link person will take responsibility for developing the agreed timetable in consultation with the relevant people within their Church body.
- In advance of the Review, statistical and other information will be provided to the reviewers (see attached templates).
- The Church authority will publicly announce the Review in advance, through appropriate

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communication channels (e.g. Church body website; Safeguarding Newsletter; Parish Newsletters etc.).

- An agreement will be reached in advance of the fieldwork about whether and how to obtain the views of children and their parents/carers; complainants; respondents; and Church personnel (see below).

2. Fieldwork

- Upon arrival, the reviewers will meet the Church authority who will provide an overview of the Church body, safeguarding personnel and structure, and case profiles. An agreement will have already been reached as to which Standards will be examined.
- The person with lead responsibility for safeguarding in the Church Body will be available to the reviewers throughout the period of their fieldwork visit(s).
- The reviewers will attend meetings as arranged by the link person.

Standards 1, 5, 6 and 7

- In terms of child safeguarding practice, training, and communications, the reviewers will meet with all relevant Church personnel, the Safeguarding Committee, a selection of Parish Safeguarding Representatives, and priests/religious, who may or may not have a role in the child safeguarding structure but who wish to share their views.
- If there is specific children's ministry, the reviewers will meet with a selection of those adults engaged in child and youth ministry.
- If there is children's ministry, the reviewers will either observe a children's activity or meet children and their parents to obtain their views on Child Safeguarding. The particular approach to be used will be agreed in advance with the Church authority.
- The reviewers will examine governance procedures, self-audits and external reviews.

Standards 2, 3 and 4 and 7

- The reviewers will be supplied with a single Case Management File Index that lists all the cases that have been created within the Church body. The DLP - or other safeguarding person nominated by the Church authority (e.g. administrator) – will explain the filing system to the reviewers, as well as how the individual case management files are structured. The reviewers will also be supplied with all case management files that have been agreed in advance to be examined.
- The reviewer(s) will read each case management file independently. The reviewers will also create a written summary with chronological information of the case. If required, and if there is more than one reviewer involved, a case management file might also be read by a second reviewer. It is the intention that an anonymised summary of the salient points of each case will be detailed in the final review report. The reviewers will analyse and assess the actions taken in the case. They will assess compliance with *Safeguarding Children Policy and Standards for the Catholic Church in Ireland 2016*, as well as with the relevant legislation and statutory guidance for the particular jurisdiction involved.
- If the reviewers are of the opinion that unmanaged or inadequately managed current risk exists in respect of a particular case, they will inform the DLP and the Church authority and

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advise them of what actions are required to reduce or eliminate the risk.

- The reviewers will seek to obtain the views of the following in connection with Case Management in the Church body being reviewed:
 - Advisor to respondents
 - Support Person for complainants
 - Complainants
 - Respondents
 - Statutory authority personnel
 - Advisory panel

3. Ways of obtaining views relating to Case Management

The case management records will provide the reviewers with details from the Church body's perspective of how the case has been managed. A discussion will take place with each Church authority on whether he/she wishes the reviewers to independently obtain the views of others. The following options will be discussed and considered, and an approach agreed in advance:

- An open invitation can be issued by the Church authority inviting anyone who wishes to give information to the Review - (in the first round of Reviews, this was often part of the notice placed on the Church body website) - providing contact details for the reviewers. The reviewers will then arrange to meet or have a phone conversation with the person(s) who come(s) forward. Such a meeting/discussion can be facilitated by an appropriate member of the Church or by an independent person, if this is deemed appropriate.
- A questionnaire can be issued by the reviewers, in agreement with the Church authority, to be returned directly to the reviewers. These can be done anonymously if the person responding so desires.
- For complainants with whom the Church authority continues to have contact, they may be invited to submit their views in writing, via questionnaire, or in person.
- For complainants who are engaged with Towards Healing Counselling service, Towards Healing can facilitate obtaining their views.
- Information and opinions obtained will be fed back in anonymised form to the Church authority, and a summary of these (also anonymised) will be included in the Review Report.

4. Conclusion of Fieldwork

The Reviewers will meet the Church authority at the end of the fieldwork to provide initial verbal feedback

5. Post Fieldwork - Assessing the information and Report Writing

- The lead reviewer will write an initial letter outlining the interim main findings of the Review, which will be forwarded to the Church authority through the CEO of the National Board.
- All the information obtained during the fieldwork will be assessed. If there are gaps in the information, the lead reviewer will consult with the link person to obtain the required data.

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- An initial draft report will be forwarded through the CEO of the National Board to the Church authority for factual accuracy checking.
- When any amendments that are required to correct errors of fact in the draft Review Report highlighted by the Church authority are made, the report will be presented in draft to a Reference Group for their critique and comment. If further work is required at the direction of the Reference Group, (see Section 2.30 for Reference Group details) the CEO will ensure this work is completed and advise the Church authority accordingly.
- The CEO will send the draft Review Report to the National Board's solicitors for legal proofing.
- A final draft of the Review Report will then be sent by the CEO of the National Board to the Church authority. The Church authority will make the decision as to whether the Review Report will be published.

6. Resolution of differences of opinion and other disputes between Church authorities and the National Board regarding Reviews

- In the event that the Church authority is dissatisfied about any aspect of the Review, they are invited to provide details of this in writing to the CEO of the National Board. The CEO will consult with the relevant reviewers about the matters raised by the Church authority, and will then respond in writing to the Church authority.
- In the event that the Church authority remains in any way dissatisfied about any aspect of the Review, having considered the written response they have received from the CEO of the National Board, they can request a meeting at which this can be further discussed. In preparation for such a meeting the Church authority and the CEO of the National Board will agree about who will attend the meeting.
- The National Board will endeavour to resolve all issues which may arise with regard to any Review in an expeditious and professional manner, and will expect that the Church body would approach the matter in a similar spirit.

7. Communication by the National Board

The National Board has a remit to monitor child safeguarding practice in the Catholic Church in Ireland.

In terms of Reviews, it will comment in its Annual Report on those reviews undertaken during the course of the year and general findings;

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Part 1 – Introduction, and Principles Underpinning Review Methodology

1 Introduction

1.1 Coimirce was incorporated in December 2008 as a company jointly established by the Irish Catholics Bishops' Conference, the Conference of Religious of Ireland and the Irish Missionary Union (now combined as AMRI). These three groupings are described as the Sponsoring Bodies.

The main object of the company is to provide advice, services and assistance in the furtherance of the development of the safeguarding of children within the Catholic Church on the island of Ireland and to monitor compliance with legislation, policy and best practice and to report on these activities annually.

1.2 The subsidiary objectives of Coimirce are:

- (i) Establishing and operating a National Office for the Safeguarding of Children;
- (ii) Liaising regularly with those agencies and organisations on the island of Ireland which have responsibility for the safeguarding of children in order to promote and maintain awareness of the Constituents of the relevant developments in civil legislation, policy and practice;
- (iii) Reporting and providing, upon request from the Constituents or any Constituent, support, advisory and training services to such Constituents or Constituent on policies and practices relating to the safeguarding of children where it is feasible to do so;
- (iv) To develop and recommend in consultation with the Sponsoring Bodies, protocols for the safeguarding of children and to recommend adherence by any Constituent or Constituents to those relevant protocols;
- (v) Reviewing and reporting on the handling of complaints by any Constituent concerning the safeguarding of children in accordance with protocols for the purposes of sub-paragraph (iv);
- (vi) Publishing an annual report or any other report prepared in connection with its activities;
- (vii) To request any Constituent or Constituents to make available to the Company, files or personnel relevant to any matter surrounding child protection;
- (viii) To raise with any Constituent or Constituents any complaints or reasonable suspicions made to the Company from any third party or state authority with a view to investigating the handling of that complaint or reasonable suspicion as known to the Constituent in the context of any applicable protocols for the safeguarding of children.

1.3 The Constituents referred to are any of the dioceses and religious congregations that have agreed to abide by the child safeguarding protocols established by the National Office of Coimirce.

1.4 Once the National Office was established, the other seven objectives were addressed. To advance objective (iv) above, the *Safeguarding Children - Standards and Guidance for the Catholic Church in Ireland was completed in late 2008*, although its circulation, uptake and implementation, supported by training, took some time. In October 2013, the NBSCCCI for Safeguarding Children in the Catholic Church in Ireland issued a document entitled *Review of Safeguarding Practice in the Catholic Church [Revised (3) Review Document -01 October 2013]*.

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This document contained the Terms of Reference for Reviews, along with Step-by-step guidance on the Review process and a description of the Methodology to be used by the NBSCCCI when conducting a Review. The Review process was then developed to implement objective (v), as listed above.

1.5 The National Board began its task of reviewing all constituent elements of the Catholic Church in Ireland (Church bodies) in 2010, a task that was only completed in 2016. These Reviews of child safeguarding policies and practices measured compliance against the 2008 Standards and Guidance. All reports of these Reviews can be accessed on the website of the NBSCCCI at www.safeguarding.ie/publications

1.6 In 2016, the National Board published its new *Safeguarding Children - Policy and Standards for the Catholic Church in Ireland*, following a very comprehensive process of consultation across the Church. There are seven child safeguarding Standards, compliance with which is achieved by a Church body meeting the indicators relevant to its ministry with children, current and historical. A 'Church body' is a generic term for each Diocese, Religious Congregation/Order, and Missionary Society in Ireland¹. Each Church body is headed up by an Ordinary, (cf canon 134.1) which can be a bishop, provincial, abbot etc².

[The terminology used in this document is consistent with that which is defined in the glossary on pages 33 and 34 of the *Safeguarding Children - Policy and Standards for the Catholic Church in Ireland (2016)*].

1.7 While the Guidance to accompany *Safeguarding Children (2016)* was being completed, the National Board convened a Working Group to revise and update the methodology to be used in the next sequence of Reviews of Church bodies, which will begin in 2019.

1.8 Among the matters that have been considered by the Working Group are:

- the role and remit of the National Board, specifically in the area of monitoring of safeguarding practice by Church bodies;
- the recommendations of the Apostolic Visitors as contained in their 2011 findings;
- the importance of the audit function in good governance of organisations;
- the audit cycle;
- the purpose and function of Reviews;
- the audit ratings used by social service audit agencies in Ireland and the UK;

1 Church body: Canon law contains many distinctions between the types of Church organisations and bodies that have developed over the life of the Catholic Church. It would be impractical to include all of these when referring to an element of the Church that has a child safeguarding responsibility. In this document the term 'Church bodies' is used as shorthand to include all of those constituent members of the Catholic Church in Ireland who hold a Memorandum of Understanding with the NBSCCCI for Safeguarding Children in the Catholic Church in Ireland. A full list is provided on the website of the NBSCCCI.

2 Church authority: This term does not appear in canon law. It can refer to the leader of the Church body, usually the bishop or provincial, or the senior administrative authority of a lay organisation or ecclesial movement. This term includes prior, prioress, abbot, abbess, congregational leaders, province leader, unit leader, regional, superior, archbishop, cardinal and diocesan administrator (while in office).

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- the scope for expanding self-audit;
- improving the consistency of interpretation between reviewers;
- training and resources;
- and attitudes to Review, both supportive and ambivalent.

1.9 In *Safeguarding Children - Policy and Standards for the Catholic Church in Ireland 2016*, the term 'Audit' is used to refer to the internal evaluation exercise conducted by a Church body (diocese or religious congregation) at least annually as part of the quality assurance covered by Standard 7; while the term 'Review' has been used to refer to the external evaluation of a Church body conducted by the National Board. In the literature about inspection, examination and evaluation against standards, 'Audit' is the more commonly used term.

1.10 The Purpose of Review

Audit is part of the process of good governance, in that it includes:

- monitoring and holding to account, both aspects of leadership;
- complying with regulatory requirements and identifying risks, both part of exercising control;
- including stakeholders and responding to their concerns, both constituents of transparency and accountability;
- ensuring that everyone knows their role and contributes purposefully and efficiently, both dimensions of effectiveness; and
- performing with honesty and repute, important elements of integrity.

Munro says about the process of audit that:

'Audit offers the opportunity to check what is being done and give consideration to whether it could be done better. It is a method of checking against defined standards, targets, objectives and performance indicators and assists with planning change and setting priorities. This is a key component when considering continuous quality improvements.'³

1.11 The outcomes of the Review exercise should be that a Church body is assisted to improve, to enhance, to ensure and to change its safeguarding policies, systems and practices in line with recommendations.

1.12 The output of the audit activity is a written Review Report that is forwarded to the Church authority. In addition to the Review Report, the reviewers may also provide verbal and/or written information and independent guidance to personnel within the Church body and/or to the Church authority over the full period of the Review.

What is done in the course of the Review, from the time that the Church authority contacts the National Board to request external auditing through to the finalisation of the Review Report, is what constitutes the methodology of the Review.

The first round of Reviews by the National Board assisted in establishing an overview of how the 175 Church bodies on the island of Ireland are managing their Child Safeguarding

³ Munro, E (2004) in *Social care governance: A practice workbook (NI) (2nd edition)*. Social Care Institute for Excellence: London.

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responsibilities. Their preparation for the Review allowed each Church authority, if they needed to, to get their case records and other documentation up to an acceptable standard, and to give Child Safeguarding their concentrated attention. This was very useful and has allowed Church bodies to benchmark their progress against the Church's Standards.

1.13 The next stage in this audit process will build on these developments and will seek to ensure:

- Public confidence that the Church body is safe for children (provided that it is safe for children);
- Affirmation to Child Safeguarding personnel that they are doing the right things well (provided that they are doing so);
- Confirmation to the Church authority that what they want to be done is in fact being done (provided that it is being done);
- Independent verification of Self-Audit; or correction and/or improvement of Self-Audit, if this is indicated;
- Opportunities for learning.

As stated in its Audit Toolkit, the Mental Health Commission identifies the way in which audit is linked with on-going quality improvement:

When assessing an organisation's levels of attainment of the standards, it is important to note that meeting the standards is not an end in itself, rather it is part of a process of continuous quality improvement. Thus, even when full attainment of a standard is achieved, it is important to look at ways in which continuous quality improvement initiatives can be developed and implemented.⁴

1.14 'Reviews will normally include the following tasks:

- a) Scoping
- b) Gathering evidence
- c) Analysis
- d) Discussing evidence
- e) Reaching findings and conclusions
- f) Making judgments
- g) Reporting.

⁴ MHC (2007) *Quality Framework for Mental Health Services in Ireland - Audit Toolkit*. Mental Health Commission: Dublin, p .5.

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For these tasks evidence may be needed about:

- a) The policy or practice being investigated (know what)
- b) The objectives it serves (know why)
- c) How it has been delivered (know how)
- d) The stakeholders (know who)⁵

2 The New Review Methodology

2.1 *Safeguarding Children Policy and Standards for the Catholic Church in Ireland (2016)* has separated Church bodies into three types, depending on the number of indicators that are relevant to their ministry and historical situation [Pp. 16 – 20]:

- Table 1: Those to which all of the 33 indicators apply, because they have current ministry with children – **Type 1** for Review purposes;
- Table 2: Those to which 22 indicators apply, because they have no current ministry with children but are still managing allegations or cases – **Type 2** for Review purposes;
- Table 3: Those to which only 15 indicators apply, because they have no ministry with children and are not managing any allegations or cases – **Type 3** for Review purposes.

2.2 All Church bodies (constituent members of the Catholic Church in Ireland who hold a Memorandum of Understanding (MOU) with the National Board) have already been reviewed by the National Board. It is logical therefore that the next Review of each Church body will examine whether and how the Recommendations, related to failures to comply with Standards, contained in its previous Review Report have been implemented in the intervening period. This applies to Type 1, Type 2 and Type 3 Church bodies.

2.3 Case Management

In relation to Case Management specifically, the next Review of Type 1 and Type 2 Church bodies will examine all cases that are still active, that is, cases where some or all of the following conditions apply:

1. The respondent is still alive, and
 - it was established that there was a case to answer;
 - both canonical and civil processes were initiated;
 - an assessment of potential risk to children has been conducted; and
 - it was decided that a management plan was required; or that a management plan was not required;
 - pastoral care supports are still being provided to the complainant; and/or;

⁵ Nutfield Foundation (2010) *Evidence for accountability - Using evidence in the audit, inspection and scrutiny of UK government*. Available at <http://www.nuffieldfoundation.org/news/evidence-accountability-using-evidence-audit-inspection-and-scrutiny-uk-government> (Accessed 6th December 2018).

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- there is an on-going civil legal process.

2. The respondent is deceased, but:

- pastoral care supports are still being provided to the complainant; and/or;
- there is an on-going civil legal process;
- further allegations have been received since the last Review.

2.4 Review of Case Management can be seen as a quasi-clinical activity, and so will only be undertaken by reviewers who are suitably professionally qualified. However, this does not mean that a reviewer with a different training and experience cannot act as the second reader of cases, if required.

2.5 Reviewers will be recruited and trained by the National Board. Both the IEC and AMRI will be represented on the selection Interview Panels for these appointments.

The skills set that will be required of reviewers will include:

- a. investigative skills (e.g. reviewing documents, conducting interviews, observing practice);
- b. analytical skills (handling and interrogating quantitative and qualitative data);
- c. facilitation skills (chairing hearings, discussions or focus groups);
- d. negotiating skills (building agreement on findings, conclusions or judgements);
- e. consultancy skills (developing advice on improving performance);
- f. communication skills (getting results across to diverse audiences).⁶

g. The reviewers will be people who have an understanding of the ethos, structure and history of the Catholic Church.

2.6 Review of Case Management will take account of the child protection legislation and statutory practice guidance that apply in that jurisdiction, as well as the *2016 Safeguarding Children - Policy and Standards of the Catholic Church in Ireland*.

2.7 Review of Case Management can be conducted separately from Review of the preventative processes involved in Child Safeguarding. However, doing so should not lead to a lack of connection between the two – i.e. Case Management and Child Safeguarding.

2.8 Reviews of Type 1 and Type 2 Church bodies will examine cases that have arisen in the period since their last Review, as well as open, active cases as described at 2.3 above. The fact that future Reviews will not have to go back through decades of case management practice should reduce focusing on poor practice.

2.8.1 Specifically, all cases which involve allegations against living clerics and religious which have been notified to the Church authority since the date of the last review will be examined.

⁶ Nutfield Foundation (2010) *Evidence for accountability - Using evidence in the audit, inspection and scrutiny of UK government*. Available at <http://www.nuffieldfoundation.org/news/evidence-accountability-using-evidence-audit-inspection-and-scrutiny-uk-government> (Accessed 6th December 2018).

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- A sample of cases which involve allegations against deceased priests received since the last review will be examined.
- Cases where there has been subsequent activity since the last review will be examined from the date of that review.
- The cases that will be examined will be done so against the Standards applicable at the time. The 2016 Standards are applicable from April 2016.
- The detailing of the history of clerical sexual abuse in individual dioceses and congregations, having been completed in the first round of Reviews, will not be repeated in subsequent Reviews.

2.9 The Review of Case Management will be conducted, in the main, in a manner similar to that employed in the first round of Reviews:

- Data Processing Deed signed by the Church authority and returned to the National Board;
- Statistical information provided to the National Board by the Church body in advance of the site visit;
- On-site reading of all relevant Case Management files, and, if kept separately, reading related legal files and canonical files. A template for completion by reviewers examining case management files is appended for information;
- On-site reading of all relevant files on complainants;
- On-site interviews with the safeguarding post holders with responsibility for this area, including the DLP, Support Persons, Advisors to respondents, Advisory Panel members (if there is a local panel) and the Canon Lawyer who advises and assists the Church authority in child safeguarding cases; and
- On-site interviews with the Church authority

2.10 Service users of Child Safeguarding services include complainants, respondents, and children engaged in Church-related activities and their families. Service user feedback is important information provided by them about whether they are satisfied or dissatisfied with a service they have received and about their general experience of the body that has provided it. Their opinion is a resource for improving user experience and, if indicated, for adjusting how services are provided.

2.11 With the co-operation of the Church authority, a process of consultation with complainants can be jointly planned in advance, to allow their voices to be represented and their perspectives to be communicated clearly. It is important that all parties would be clear that the purpose of such consultation would be to review the process of support and assistance in which the complainant was / is involved, and not the outcome of that process. A sensitive procedure would be required to ensure that no complainant would be further distressed by this consultation.

2.12 With the consent and support of the Church authority, a process of consultation with respondents can be jointly planned in advance, to allow their voices to be represented and their perspectives to be communicated clearly. It is important that all parties would be clear that the purpose of such consultation would be to review the process of support and assistance in which the respondent was / is involved, and not the outcome of that process. A sensitive procedure would be required to ensure that no respondent would be further distressed by this consultation.

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2.13 The value and effectiveness of a Review is completely dependent on reviewers having full and complete access to all relevant documentation and information relating to Case Management known to the Church authority. Reviews have to proceed on the understanding that willingness exists on the part of each Church authority to provide full access to the reviewers to Case Management file material and other sources of Case Management information, subject, where relevant, to the terms of the Data Processing Deed agreed.

2.14 If a reviewer identifies Case Management practices that are a cause of concern, they will address these through the provision of guidance and support. If however, the reviewer's concern is that a child / children are currently being put at risk, then they will immediately notify the Church authority to ensure that formal notifications are made to the statutory authorities.

If a reviewer -in examining how cases have been managed - identifies situations that should have been notified to the statutory authorities but which have not been so notified, they will ensure that immediate notifications are made by the Church authority, or, if necessary, by the CEO of the NBSCCCI.

2.15 Reviewers will not have any other role or responsibility within the National Board and will be recruited specifically to conduct Reviews; and reviewers will be required to adhere to the Code of Practice that has been developed (see Appendix).

2.16 There will be a greater clarity around evidential standards, to be achieved through planned and consistent training for the reviewers.

2.17 The CEO of the National Board will put in place a first line quality control mechanism, which will function through having one person (which could be the CEO or another member of the National Board's staff) who is not involved directly in conducting Reviews, tasked with reading each draft Review Report to check that an acceptable level of consistency and fairness is being achieved and maintained, and to ensure that reviewer bias does not become an undermining factor.

2.18 Child Safeguarding

The Review of Child Safeguarding will be a two stage process:

Stage 1 – the Pre-Review process, based on robust and detailed questionnaires which will give the overview or map of ministry with children activities in the relevant Church body. This stage will constitute a form of Self-audit. The Church authority and other key Child Safeguarding post holders will be requested to provide a range of information, to include issues such as recruitment of staff and volunteers, training, codes of conduct for staff and young people and all of the other essentials of good Child Safeguarding practice.

With this information the Church authority and the National Board will agree the particular focus of the Child Safeguarding Review to be conducted. Unless and until all of the information requested is supplied to the National Board, no Review fieldwork can commence.

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2.19 Review of the organisational level from the documents provided, including:

Safeguarding structures and roles;

- adoption of Safeguarding Children Policy and Standards for the Catholic Church in Ireland 2016;
- training;
- recruitment, including vetting;
- communications;
- the work of the Safeguarding Committee, including planning; and;
- identifying who in the Church body is engaged in ministry or Church related activities with children.

Stage 1 activities will involve listing, checking, mapping and clarifying.

2.20 **Stage 2** – Review at the level of practice– ‘on the ground’. This will involve observing ministry with children in operation, and will require reviewers to undertake site visits, such as visiting a Pastoral Centre to sit in on Youth Faith Group, or talking to members of a Children’s Choir. It will also involve conducting interviews with representative participants; as well examining records of activities, specific policies, completed forms etc.

Interviews conducted at Stage 2 with safeguarding post holders and people in ministry and activity leaders, will ask them to describe and show how in their practice they meet the requirement of particular Indicators (Under *Safeguarding Children Policy and Standards for the Catholic Church in Ireland 2016*), such as, effective practice in encouraging children’s positive behaviour [1.3], or effective practice for the appropriate use of information technology, including social media by Church personnel and by children. [1.9]

2.21 Reviews will be more consistent in terms of:

- how they are conducted;
- what will be highlighted;
- the strength of evidence underpinning findings; and;
- transparency in showing how recommendations are arrived at.

The evidential basis of findings will be made explicit in Review Reports.

2.22 Recommendations in Review Reports will only be made when it has been established by presenting the evidence that the Church body is non-compliant; and the recommendation that may be made will be about what steps need to be taken to achieve compliance with the relevant Indicators of Safeguarding Children Policy and Standards for the Catholic Church in Ireland 2016. The emphasis at all times will be on to how to improve and strengthen practice. Consistency in the content and configuration of Recommendations following the Reviews across all Church Bodies is a goal of the new Review Methodology.

If a reviewer wishes to make a suggestion for improvement or to give a piece of practice advice, this is appropriate, but it will not be recorded in the Review Report in the form of a

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recommendation.

2.23 In reaching conclusions, the reviewers will clearly make a distinction between mistakes, and a finding of poor practice. The fact that a Church body made a mistake or an error of judgment in one particular case will not lead to a finding of poor practice if there is also evidence of good practice in other cases. A finding of poor practice has to be based on more than one piece of evidence.

2.24 The National Board will engage each Church authority to negotiate and agree with them on the focus of the Review to be conducted. This focus will be decided in part on the basis of the type of Church body concerned; its performance in implementing the recommendations contained in its last Review Report; and any particular concerns that need to be addressed.

2.25 The National Board will take account of the differences in scale between Church bodies so that Review procedures are tailored to the size of the Church body.

2.26 The format of the Review that is decided upon for Type 1 and Type 2 Church bodies will specify whether Case Management and Child Safeguarding are to be reviewed together in the one full Review; or whether for reasons that are clear, the review of Case Management is to be conducted first, with agreement about when the Review of Child Safeguarding is to be undertaken.

2.27 The National Board and Church authority will also reach agreement about:

- The frequency of Reviews required;
- The Standards against which the Church body will be reviewed;
- The procedures that will be followed by the reviewers; and
- The identity of the reviewers.

2.28 The value and effectiveness of a 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 heretofore.

2.29 National Board Review Reports will not need to be agreed reports. It will remain important that every effort is made by the National Board to ensure the factual accuracy of the information presented. It will however remain the decision of the Church authority to publish, and by what method.

2.30 The National Board's Review process will be overseen by Dr Helen Buckley, expert in child safeguarding.

2.31 When Dr Buckley has made her observations and recommendations on an individual Review Report, the National Board makes whatever final amendments are required. The National Board then signs off the final draft report before returning it to the Church authority for their action. It will be a matter for the Church authority whether they wish to make their Review Report public.

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Part 2 – The Review Protocols

3 - Sequence of steps in a Review of a Church body – Case Management

3.1 A letter of invitation to review is sent by the Church authority to the CEO of the National Board requesting a meeting to discuss commissioning a Review.

3.2 At the subsequent meeting (Stage 1) the Church authority (or their nominee) and the CEO (or their nominee) will agree:

- what Type the Church body is (Type 1, Type 2 or Type 3);
- against which Standards and their supporting Indicators will performance and compliance be examined and measured by the Review;
- that the Data Processing Deed will be signed by the Church authority and the CEO of the National Board before any Review activity can be commenced;
- who will act as the link person (most likely the DLP) between the Church body and the National Board for the purpose of communication about the arrangements for the Review;
- what written information is to be supplied to the National Board in advance of the fieldwork element of the Review;
- when the Review will commence, and when the stages of the Review will be conducted, including the fieldwork visits;
- who will conduct the Review;
- who the reviewer(s) will want to meet and interview;
- if the Review is to examine Case Management (Type 1 and Type 2), to which case management files the reviewers will need to have access;
- who the contacts are in the relevant statutory agencies, Police and Social Services.

3.3 The lead reviewer will make contact with the nominated link person in the Church body to ensure that all required information for Stage 2 of the Review is made available by the Church body in the format requested, before the fieldwork visit(s) can take place.

3.4 In relation to the Case Management element of the Review, the Church authority will be requested to ensure that all of the relevant case management files and related documentation are prepared and will be made available to the reviewer(s).

3.5 The lead reviewer will make contact with the nominated link person in the Church body to agree a timetable for the fieldwork visit(s), to include an agreed schedule of meetings, interviews and site visits. The lead reviewer will type up the agreed timetable and submit this to the Church authority for confirmation. It is preferable that the DLP is available to the reviewers throughout the period of their fieldwork visit(s). The reviewer(s) will need to meet the Church authority at the beginning of the fieldwork visiting, and again when they are at the end of their visiting.

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3.6 In order to facilitate the work of the reviewers in reading Case Management files and related documentation, the Church authority will be requested to make available the following facilities:

- A private room with a door that can be locked;
- A second room in which meetings and interviews can be conducted;
- A desk and chair for each reviewer;
- Plug sockets for each reviewer to allow them to plug in their laptop computers;
- WiFi internet access (so that any records made by the reviewers can be directly typed and stored onto the National Board's secure server in Maynooth);
- Access to a toilet;
- Tea / coffee making facilities;
- A light lunch.

3.7 On arrival, the reviewers will be supplied with a single case management file index that lists all the cases that have been created within the diocese. The DLP - or other safeguarding person nominated by the Church authority (e.g. administrator) – will explain to the reviewers the filing system, as well as how the individual case management files are structured. The reviewers will also be supplied with all case management files as agreed at 3.2 above.

3.8 The reviewer(s) will read each case management file independently. The reviewers will complete the Case Management Template for each case file that they read; and they will also create a written summary with chronological information of the case. If required, and if there is more than one reviewer involved, a case management file might also be read by a second reviewer.

3.9 Following their reading of the case management file and their creation of a written summary, the reviewers will analyse and assess the actions taken in the case. They will assess compliance with *Safeguarding Children Policy and Standards for the Catholic Church in Ireland (2016)*, as well as with the relevant legislation and statutory guidance for the particular jurisdiction involved.

3.10 If the reviewers are of the opinion that unmanaged or inadequately managed current risk exists in respect of a particular case, they will inform the DLP and the Church authority and advise them of what actions are required to reduce or eliminate the risk.

3.11 When the reviewers have finished the examination of all of the case management files, and if such documents exist, the reviewers will examine and review any local policies, procedures and practice guidance to establish whether they conform to *Safeguarding Children Policy and Standards for the Catholic Church in Ireland (2016)*.

3.12 The reviewers will examine the Minutes files for Advisory Panel meetings and for any other meetings at which Case Management is discussed by the Church body (e.g. meetings of Consulators; meetings of Leadership Team etc.)

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3.13 The reviewers will meet with and interview the following safeguarding personnel in connection with Case Management in the Church body being reviewed:

- The Church authority
- The DLP
- The Advisory Panel
- The Support Person / Persons
- The Advisors to respondents
- If involved, the Canon Lawyer who works within the Church body
- If involved, the Diocesan Secretary who manages file records
- Any other person who has been identified at 3.2 as being important to meet.

3.14 The reviewers will speak to representatives of the relevant statutory agencies to ascertain their views on the quality of the working relationships that exist between them and the Church authority, and any related matter.

3.15 On completion of the fieldwork element of a Review that includes an examination of Case Management, the reviewer(s) will meet with the Church authority and the DLP to provide verbal feedback on initial key findings in relation to Case Management in the Church body.

3.16 The lead reviewer will write a first draft Review Report and provide this to the CEO of the National Board.

3.17 The CEO will arrange for the draft to be forwarded to the Church authority for factual accuracy checking.

3.18 When any amendments have been made that are required to correct errors of fact in the draft Review Report highlighted by the Church authority, 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.

3.19 The CEO will send the draft Review Report to the National Board's solicitors for legal proofing.

3.20 The draft Review Report will be forwarded to the National Board for its approval.

3.21 A final draft of the Review Report will then be sent by the CEO of the National Board to the Church authority. The Church authority will make the decision as to whether the Review Report will be published.

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4 - Sequence of steps in a Review of a Church body– Child Safeguarding

If the Review to be conducted will involve an examination of Case Management and Child Safeguarding (Type 1 and Type 2 Church bodies), the sequence of steps to be taken will include all of those set out under Section 3 above, in addition to those set out in this Section 4 below.

If the Review to be conducted will examine Child Safeguarding only (Type 3 Church body), then the sequence of steps to be taken is described in this, Section 4, below.

4.1 A letter of invitation to review is sent by the Church authority to the CEO of the National Board requesting a meeting to discuss commissioning a Review.

If the Church body is Type 3 and is very small, such as only having one house for retired religious; or if the Church body is Type 3 and is a congregation of enclosed Sisters or Monks, then a decision can be taken at this point as to whether a face to face meeting is required, as well as to whether any fieldwork visit will be required. A desktop Review may be sufficient, conducted by email, surface mail and telephone phone interviews

4.2 At the subsequent meeting (Stage 1) the Church authority (or their nominee) and the CEO (or their nominee) will agree:

- what Type the Church body is (Type 1, Type 2 or Type 3);
- against which Standards and their supporting Indicators will performance and compliance be examined and measured by the Review;
- that the Data Processing Deed and MOU will be signed by the Church authority and the CEO of the National Board before any Review activity can be commenced;
- who will act as the link person (most likely the DLP) between the Church body and the National Board for the purpose of communication about the arrangements for the Review;
- what written information is to be supplied to the National Board in advance of the fieldwork element of the Review;
- when the Review will commence, and when the stages of the Review will be conducted, including the fieldwork visits;
- who will conduct the Review;
- who the reviewer(s) will want to meet and interview;
- what sites the reviewer(s) will want to visit and what ministries or activities they will want to observe;

4.3 The lead reviewer will make contact with the nominated link person in the Church body to ensure that all required information for Stage 2 of the Review is made available by the Church body in the format requested, before the fieldwork visit(s) can take place.

4.3 The lead reviewer will make contact with the nominated link person in the Church body to agree a timetable for the fieldwork visit(s), to include an agreed schedule of meetings, interviews and site visits. The lead reviewer will type up the agreed timetable and submit this to the Church

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authority for confirmation. It is preferable that the DLP is available to the reviewers throughout the period of their fieldwork visit(s). The reviewer(s) will need to meet the Church authority at the beginning of the fieldwork visiting, and again when they are at the end of their visiting.

4.4 In order to facilitate the work of the reviewers in reading Child Safeguarding documentation, the Church authority will be requested to make available the following facilities:

- Car parking;
- A private room with a door that can be locked;
- A second room in which meetings and interviews can be conducted;
- A desk and chair for each reviewer;
- Plug sockets for each reviewer to allow them to plug in their laptop computers;
- WiFi internet access (so that any records made by the reviewers can be directly typed and stored onto the National Board's secure server in Maynooth);
- Access to a toilet;
- Tea / coffee making facilities;
- A light lunch.

4.5 On arrival, the reviewers will be supplied with a single Child Safeguarding documents index that lists all the files and other documentation that the Church body has created in relation to Child Safeguarding. The DLP - or other safeguarding person nominated by the Church authority (e.g. administrator) – will explain to the reviewers the filing system, as well as the structures that have been put in place to develop Child Safeguarding across the Church body.

4.6 The reviewer(s) will meet with and interview the following safeguarding personnel in connection with Child Safeguarding in the Church body being reviewed:

- The Church authority
- The DLP
- The Child Safeguarding Committee
- The person responsible for vetting
- The Child Safeguarding Trainer(s)
- The person(s) with responsibility for communicating information and guidance on Child Safeguarding through various media
- Any other person who has been identified at 4.2 as being important to meet.

4.7 The reviewer(s) will undertake the site visits as agreed at 4.2 above, to observe activities and to interview participants.

4.8 On completion of the fieldwork element of a Review that includes an examination of Child Safeguarding, the reviewer(s) will meet with the Church authority and the DLP to provide verbal feedback on initial key findings in relation to Child Safeguarding in the Church body.

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4.9 The lead reviewer will write a first draft Review Report and provide this to the CEO of the National Board.

4.10 The CEO will arrange for the draft to be forwarded to the Church authority for factual accuracy checking.

4.11 When any amendments that are required to correct errors of fact in the draft Review Report highlighted by the Church authority, 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.

4.12 The CEO will send the draft Review Report to the National Board's solicitors for legal proofing, if this is deemed necessary.

4.13 The draft Review Report will be forwarded to the National Board for its approval.

4.14 A final draft of the Review Report will then be sent by the CEO of the National Board to the Church authority. The Church authority will make the decision as to whether the Review Report will be published.

5 - Resolution of differences of opinion and other disputes between Church authorities and the NBSCCCI regarding Reviews

5.1 In the event that the Church authority is dissatisfied about any aspect of the Review, they are invited to provide details of this in writing to the CEO of the National Board. The CEO will consult with the relevant reviewers about the matters raised by the Church authority, and will then respond in writing to them.

5.2 In the event that the Church authority remains in any way dissatisfied about any aspect of the Review having considered the written response they have received from the CEO of the National Board, they can request a meeting at which this can be further discussed. In preparation for such a meeting the Church authority and the CEO of the National Board will agree about who will attend the meeting.

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Letter and Questionnaire for Respondents

Dear [INSERT NAME OF RESPONDENT],

[INSERT NAME OF CHURCH AUTHORITY] has invited the National Board for Safeguarding Children in the Catholic Church in Ireland to conduct a review of child safeguarding practice in [INSERT NAME OF CHURCH BODY]. As part of the review we are interested in hearing from complainants and respondents of abuse.

We understand that you have been informed that an allegation of child abuse has been made against you. In reviewing how [INSERT NAME OF CHURCH BODY] has managed the allegation, the National Board is interested in receiving your views on a number of matters which relate to the Church's Child Safeguarding Standards.

The 2016 Standards contain a new Standard 4 – Care and Management of the Respondent – and this is the particular Standard which relates to your situation. The Standard has four Indicators, and these are what we would like you to consider when making your reply on the questionnaire overleaf.

Your reply will be confidential to the two reviewers, and great care will be taken to ensure that you cannot be identified from what will be written in the Review Report.

You can send your response directly to me at the National Board [INSERT EMAIL ADDRESS] [INSERT DATE].

Thank you in anticipation of your response.

Yours sincerely

[INSERT NAME]

National Board For Safeguarding Children in the Catholic Church in Ireland

National Board Review, Stage 1 - Pre-fieldwork Questionnaire

	Name of Church body (diocese or religious congregation)						
	Name of Church authority (Bishop or Provincial)						
	Contact details for Church authority						
	<table border="1"> <tr> <td data-bbox="536 1281 632 1370">Postal address</td> <td data-bbox="536 1370 632 1460">Email address</td> <td data-bbox="536 1460 632 2016">Phone</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </table>	Postal address	Email address	Phone			
Postal address	Email address	Phone					
	Name of Designated Liaison Person (DLP)						
	Contact details for DLP						
	<table border="1"> <tr> <td data-bbox="759 1281 855 1370">Postal address</td> <td data-bbox="759 1370 855 1460">Email address</td> <td data-bbox="759 1460 855 2016">Phone</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </table>	Postal address	Email address	Phone			
Postal address	Email address	Phone					
	Name and address, and contact details for the Church body's Child Safeguarding service						
	<table border="1"> <tr> <td data-bbox="983 1281 1046 1370">Name and postal address</td> <td data-bbox="983 1370 1046 1460">Email address</td> <td data-bbox="983 1460 1046 2016">Phone</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </table>	Name and postal address	Email address	Phone			
Name and postal address	Email address	Phone					
	Has DLP's Annual Report to Church authority for 2017 been completed (Standards 2, 3 and 4); and will it be available to NBSCCI reviewers during their fieldwork visit?						

Please complete the Table below on new allegations received since the [previous National Board Review](#):

New Allegations Received Since Last Review

Standard 2

Please complete the table below by entering the appropriate number of allegations received in each box (enter zero if no allegations have been received for a category)

Respondent Type	Number by Respondent	Number Reported to Garda/PSNI	Number Reported to Tusla/Social Services	Number Reported to NBSCCCI	
Clerics					
Non Ordained Religious					
Lay Church Personnel				N/A	
Non Church Personnel				N/A	

Case Management			
Are you managing any priests/religious out of ministry as a result of allegations of child abuse?	No	Yes	Number being managed
If 'yes' to the previous question - Is there a written plan in place for each priest/religious out of ministry?	Not applicable	Yes for all	Not for all
If 'yes' to the previous question - Who conducts monitoring visits?	Not applicable		
If there are management plans in place for one or more priests/religious, how frequently are these reviewed?	Not applicable		
Are there any (retired) priests/religious from another Church body living /on retreat in your Abbey that are out of ministry?	Yes	There are none	Don't know
If 'yes' to the previous question - Who monitors the	Not applicable		

priest(s)/religious?		
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Does the Church authority have access to an Advisory Panel / Committee / Group from which he / she receives advice and guidance on Case Management matters; and if so, can you please provide details?	
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Child Safeguarding			
Name of Child Safeguarding Coordinator			
Contact details for Child Safeguarding Coordinator		Postal address	Phone
Name of Chairperson of Child Safeguarding Committee			
Names of members of Child Safeguarding Committee			
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
Does the Child Safeguarding Committee have a written Constitution; and if so, will this be available to the NBSCCCI reviewers during their fieldwork visit?			

Details of Trainer(s) registered by the National Board	Name	Date Registered
<p>Has the Child Safeguarding Committee produced a three-year written Child Safeguarding Plan; and if so, will this be available to the NBSCCCI reviewers during their fieldwork visit?</p>		
<p>Has the Church body completed its Annual Child Safeguarding Audit for 2017 (Standards 1, 5 and 6); and if so, will the written report of this Audit be available to the NBSCCCI reviewers during their fieldwork visit?</p>		
<p>Does the Church authority make visits to parishes / community houses / ministries to ensure that there is an awareness of child safeguarding, and that effective practice is being implemented; and if so, will the written record of these visits be available to the NBSCCCI reviewers during their fieldwork visit?</p>		

With reference to Standard 1		
	Yes	No
Have there been any situations where someone has raised a concern under the whistleblowing procedure?		
If 'yes' to the previous question - How was this (how were these) addressed?	How addressed	Not applicable
Have you received any complaints under standard 1.7?	Yes	No
If 'yes' to the previous question – How was this (how were these) resolved?	How resolved	Not applicable