



Towards Healing Safeguarding Policy

June 2024

1. Purpose

The purpose of this document is to articulate the policy, procedures, and process for safeguarding in Towards Healing. It also outlines the roles and responsibilities of all parties involved.

2. Objective

Towards Healing is an organisation dedicated to providing therapeutic support services to survivors of clerical, institutional, or religious abuse by the Catholic Church and its associates, on the Island of Ireland. This Safeguarding Policy outlines our commitment to ensuring the safety, dignity, and well-being of individuals accessing our services, and our approach to preventing and addressing any form of harm, abuse, or neglect that may occur in the scope of our services.

3. Scope

This policy applies to the service-users, staff, and affiliates of Towards Healing.

4. Legal and Ethical Framework

Towards Healing operates in accordance with Irish laws, regulations, and ethical principles related to safeguarding. This policy aligns with the Children First Act 2015, National Board of Safeguarding Children's 'Safeguarding Children: Policy and Standards for the Catholic Church in Ireland' (2016) (see Appendix II), Protections for Person Reporting Child Abuse Act 2015, Section 176 of the Criminal Justice Act 2006, Criminal Law (Sexual Offences) Act 2017 and other relevant legislation pertaining to mandated persons.

5. Definitions

- **Survivors:** Individuals who have experienced clerical, institutional, or religious abuse by the Catholic Church, and its associates, on the Island of Ireland, and seek support through our services.
- **Abuse:** Any form of physical, emotional, sexual harm, or neglect (see Appendix I).
- **Safeguarding:** Safeguarding within Towards Healing refers to a comprehensive and proactive approach aimed at ensuring the safety, well-being, and dignity of individuals who have experienced abuse during childhood. The primary objective of safeguarding in this context is to create a secure and supportive environment that empowers survivors, protects their rights, and mitigates any potential risks or harm.
- **Mandated Person:** A mandated person is any professional, listed under Schedule 2 of the Children's First Act 2015, obligated by law to report any knowledge, belief or reasonable suspicion that a child has been harmed, is being harmed, or is at risk of being harmed.¹ This also pertains to retrospective disclosures of sexual abuse as a minor as directed under the Children's First National Guidance 2017.

6. Towards Healing's Safeguarding Approach

- 6.1 **Prevention:** Implementing measures to prevent any form of harm, abuse, or neglect that could adversely affect the adult survivors we work with. This includes vetting procedures, staff training, and the establishment of clear boundaries to maintain a safe therapeutic space.
- 6.2 **Identification:** Recognising and promptly addressing signs of distress, vulnerability, or potential harm in adult survivors. This involves equipping our staff with the skills to identify indicators of ongoing abuse, emotional distress, or other factors that may compromise the well-being of survivors.
- 6.3 **Reporting and Intervention:** Establishing clear procedures for reporting any concerns or suspected instances of abuse. Our organisation is committed to taking immediate and appropriate action to intervene, protect, and support survivors when necessary, while adhering to legal and ethical standards.
- 6.4 **Confidentiality with Limits:** Safeguarding involves maintaining confidentiality as a fundamental principle, while also recognising that in certain situations, disclosure to appropriate service and/or authorities may be necessary to protect the safety of the survivor or others. Sharing Child Protection information is not a breach of confidentiality. Survivors are made aware of Towards Healing's Confidentiality

¹ The Act defines harm as assault, ill-treatment, neglect or sexual abuse, and covers single and multiple instances.

Policy and the limits to confidentiality in this area of work during registration. Staff members and affiliate counsellors work within Towards Healing's Confidentiality Policy.

6.5 Training and Awareness: Ensuring that all staff members are adequately trained in recognising the specific dynamics and challenges associated with childhood abuse. This includes mandatory training in the Children First Act (2015), continuous education on trauma-informed care, ethical considerations, and the latest research and best practices in supporting adult survivors.

7. Responsibilities

- **Mandated Persons:** All mandated persons working with Towards Healing are responsible for upholding the safeguarding principles outlined in this policy, recognising signs of abuse, and reporting concerns appropriately. This includes Affiliate Counsellors.
- **Management:** The Counselling Manager, with oversight from the Director of Services, oversees the implementation and review of this safeguarding policy, ensuring all mandated persons are trained and supported to follow the policy.
- **Survivors:** Individuals accessing our services have the right to feel safe, respected, and supported throughout their healing journey and are encouraged to voice any concerns regarding issues of safeguarding.

8. Reporting Procedure

Counsellors affiliated with Towards Healing are required to work within the Towards Healing Safeguarding Policy. The assigned counsellor is responsible for reporting on child protection concerns as required under the legislation. Any staff member with concerns outside the assigned counsellor's duties is required to report concerns to the Counselling Manager, who will then follow the reporting procedure.

8.1 Reporting Procedure for Affiliate Counsellors:

- If abuse has been previously reported to a Mandated Person, then the Towards Healing affiliate counsellor / Towards Healing counselling coordinator can record the name of Mandated Person that abuse was reported to and will not be required to carry out an additional report. This is in accordance with Section 14(4) of the Children's First Act 2015.

- If the perpetrator of abuse is deceased, a report will not be required – unless the service-user wishes for one to be submitted.
- Reporting should not take place if the assigned counsellor, in their professional opinion, deem that reporting on retrospective childhood abuse disclosures would exacerbate psychological distress in a vulnerable adult or there is a threat of self-harm or suicide.
- When dealing with cases of current or potential abuse, it's important to remember the following guideline: if you learn that an adult was abused as a child, and:
 - a) The perpetrator is still alive, and
 - b) The perpetrator holds a community position (such as a priest), and
 - c) The perpetrator is still active within the community,

then it is reasonable to suspect that other children may be at risk. Therefore, it is essential to report the situation to Tusla or An Garda Síochána.

- At time of registration to Towards Healing, service-users are informed that limited information relating to the abuse is required for the purposes of registration to ensure Towards Healing's remit has been met. A report to Tusla or An Garda Síochána is not made at this time.
- During registration, service-users of Towards Healing are informed of the possible requirement to name alleged perpetrator(s) and/or provide identifying information about the abuse to their assigned counsellors within the first 12 sessions of their Towards Healing counselling allocation.
- Reporting is in line with the Children First Act (2015) and the ethos of this Safeguarding Policy.
- Reporting concerns is a serious decision, and Towards Healing acknowledges the difficulty. For this reason, in cases where there is a requirement to report, counsellors are permitted to engage with service-users for up to 12 sessions to work through the impact of reporting disclosures of retrospective abuse.
- Affiliate counsellors are mandated persons by law. When deemed necessary, affiliate counsellors must submit information to Civil Authorities (i.e. Tusla for Rep. of Ireland and Gateway for Northern Ireland) by completion of the initial allocation of 12 sessions. Affiliate counsellors must then provide Towards Healing with the unique reference number so that Safeguarding and Child Protection requirements are met. Further details on this process is provided in the Towards Healing *Terms of Engagement* for affiliate counsellors.
- In cases where the assigned counsellor deems there is a necessary requirement to file a child protection report, and the service-user does not wish to engage with the reporting process, Towards Healing will not be in a position to offer further counselling sessions after the initial 12 allocated.
- The Protection for Persons Reporting Child Abuse Act 1998 protects those reporting

child abuse in good faith against the wishes of the service-user.

- It is important that counsellors must adhere to professional standards and the organisations of their accrediting bodies.

8.2 Reporting Procedure for Staff Members:

- The staff member must document the details accurately and promptly.
- The Counselling Manager should be notified immediately.
- The Counselling Manager will assess the situation, determine necessary actions, and report to relevant authorities, if warranted.

9. Record Keeping

Comprehensive and confidential records of safeguarding concerns, interventions, and outcomes are maintained securely in line with Towards Healing's Data Protection Policy.

10. Whistleblowing

Towards Healing supports a culture of openness where staff members and affiliate counsellors can report concerns about colleagues' conduct without fear of retribution under Protected Disclosures Act 2014, the Protected Disclosures (Amendment) Act 2022, and the EU Whistleblowing Directive. For this, it is recommended to follow the Grievance and Disciplinary Procedure where a protected disclosure can also be made.

11. Policy Review:

This policy will be reviewed every two years to ensure its effectiveness and relevance.

12. Availability of Procedure:

The safeguarding procedure will be made available on the Towards Healing website www.towardshealing.ie and is available to download, or service-users may request a paper copy to be sent to them.

Date of Policy Approval:

___20th February___ 2024

Appendices**Appendix I: Definitions of Abuse**

Neglect: “An omission, where the child suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to, and affection from adults, or medical care.”

Emotional Abuse: “When a child’s need for affection, approval, consistency and security are not met”. “Emotional abuse is normally to be found in the relationship between a care-giver and a child”.

Sexual Abuse: “When a child is used by another person for his/her gratification or sexual arousal or for that of others”.

Physical Abuse: “Any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a child”.

Appendix II: Reference Documents

The following documents are available for downloading:

Children First Act 2015: <http://www.irishstatutebook.ie/eli/2015/act/36/enacted/en/pdf>

Children First - Tusla Children's National Guidelines for the Protection and Welfare of Children:

https://www.tusla.ie/uploads/content/Children_First_National_Guidance_2017.pdf

National Board for Safeguarding – Safeguarding Children: Standards and Guidance for the Catholic Church in Ireland 2016:

<https://safeguarding.ie/images/Pdfs/Standards/Safeguarding%20Children%20Policy.pdf>