



Private and Confidential

**Review of Safeguarding Practice
in the Religious Congregation of the
Irish Region of the Sisters of St Louis
undertaken by**

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

**This review as undertaken at the invitation of the Regional Leader
Sr Anne Kavanagh**

September 2014

CONTENTS

Background	<i>Page 3</i>
Standard 1 <i>A written policy on keeping children safe</i>	<i>Page 8</i>
Standard 2 <i>Management of allegations</i>	<i>Page 11</i>
Standard 3 <i>Preventing Harm to Children</i>	<i>Page 16</i>
Standard 4 <i>Training and Education</i>	<i>Page 19</i>
Standard 5 <i>Communicating the Church's Safeguarding Message</i>	<i>Page 21</i>
Standard 6 <i>Access to Advice and Support</i>	<i>Page 23</i>
Standard 7 <i>Implementing and Monitoring Standards</i>	<i>Page 25</i>
Recommendations	<i>Page 27</i>
Terms of Reference	<i>Page 29</i>

Background

The National Board for Safeguarding Children in the Catholic Church in Ireland (NBSCCCI) was asked by the Sponsoring Bodies, namely the 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 purpose of the review is to confirm that current safeguarding practice complies with the standards set down within the guidance issued by the Sponsoring Bodies in February 2009 *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland* and that all known allegations and concerns had been appropriately dealt with. To achieve this task, safeguarding practice in each Church authority is to be reviewed through an examination of case records and through interviews with key personnel involved both within and external to a diocese or other authority.

This report contains the findings of the *Review of Safeguarding Practice within the Irish Region of the Sisters of St Louis* undertaken by the NBSCCCI in line with the request made to it by the Sponsoring Bodies. It is based upon the case material made available to the NBSCCCI by the Sisters of St Louis, along with interviews with selected key personnel who contribute to safeguarding within the region. The NBSCCCI believes that all relevant documentation for these cases was passed to the reviewers, and the Regional Leader has confirmed this.

The findings of the review have been shared with a reference group before being submitted to the Regional Leader, along with any recommendations arising from the findings.

Introduction

The Institute the Sisters of St Louis was founded in France in 1842, and came to Ireland in 1859 at the invitation of the Bishop of Clogher to provide education and social care services. The Institute was initially located in Monaghan, but developed foundations in Bundoran (1870), Ramsgrange (1873), Middletown (1875), Carrickmacross (1888), Kiltimagh (1897), Clones (1900), Rathmines (1913), Balla (1918), Kilkeel (1921); Newcastle (1922), Ballymena (1924); Clogher Co Tyrone (1933); Cushendall, Co Antrim (1945), Dundalk (1950).

The Institute has an international structure, with foundations outside the Republic of Ireland in England (1912), Northern Ireland (1921), Ghana (1947), Nigeria (1948), USA (1949), Brazil (1977), the Republic of Benin (2001), Ethiopia (2012). Its central leadership is made up of a team of four sisters, with overall responsibility for governance of the Institute. Currently, the Central Leadership Team (CLT), elected in 2009, is based in Ireland. There are 420 sisters in the Institute globally, who are engaged mainly in education and nursing and in parish work, including counselling. They are organised into one province (Nigeria), three regions (California, Ghana, Ireland) and one Mission (England), each governed by a leadership team appointed by the Central Leadership Team after consultation with the sisters. Sisters from these areas also work in the Republic of Benin, Brazil, France and Ethiopia. The focus for recruitment of new sisters is in the Global South.

A total of 195 sisters belong to the Irish Region. The average age of the sisters is 78 years. There are no sisters in Ireland in formation. The sisters are located across the Region in community groupings in the same house or in networks when living alone. There are 23 sisters in nursing homes in the Monaghan and Dublin areas. Much of the current activity within the Institute in Ireland is associated with the care of its ageing population.

Historically, the Institute of St Louis has provided a considerable portfolio of educational and social care services in both jurisdictions in Ireland. This has included mainstream educational provision (primary and secondary schools) and social care provision (a training school in Northern Ireland and an orphanage in the Republic of Ireland). Trusteeship of the network of schools in the Republic of Ireland has now been passed from the Institute to the Le Cheile Schools Trust, of which the Region is a founding member. These include four voluntary secondary schools and three community schools. All St Louis primary schools are in diocesan trusteeship. In Northern Ireland the Irish Region of the Sisters of St Louis are trustees of two secondary level schools. All of the schools are managed by boards of management or boards of governors, constituted according to protocols agreed in the Republic of Ireland and Northern Ireland and are accountable to the Department of Education and Skills in the Republic of Ireland and the Department of Education in Northern Ireland. The Irish Region no longer provides residential care – St Joseph’s Training School, Middletown closed in the late 1990s and St Martha’s Orphanage, Monaghan, closed in 1957, and transferred to Bundoran. The

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

orphanage was closed in 1964. The contemporary mission of the sisters in Ireland is carried out through work in a variety of areas, such as counselling, ecology (especially education and awareness-raising), education (youth/adult), empowerment/capacity-building, evangelization, health care within communities, justice work, leadership at local and regional level, partnership, retreat work, and spiritual accompaniment. A total of 3 sisters are active in community based projects in Dublin (Youth Horizons) and Belfast (St Louis House for Youth Ministry) which bring them into direct contact with young adults. Neither of these projects is under the trusteeship of the Irish Region of the Sisters of St Louis, and each has its own governance structure.

The Irish Region of the Sisters of St Louis' safeguarding structure consists of a Designated Person, who relates to the Regional Superior. These two sisters carry out all of the associated roles.

The reviewers are aware that the Irish Region of the Sisters of St Louis was subject to claims under the Residential Institutions Redress Act 2002. (note the following which are listed in the schedule to the Residential Institutions Redress Act 2002: St Martha's Industrial School Bundoran and St Joseph's Orphanage Bundoran, under the trusteeship of the diocese of Clogher. Some Sisters of St Louis ministered in the orphanage). Legal advice provided to the NBSCCCI has established that any matters dealt with under the remit of the Redress Act must lie outside the scope of its child safeguarding reviews. The NBSCCCI was advised by the sisters that according to these terms of reference, the safeguarding files to be reviewed amount to a total of 6, of which 4 refer to allegations of child sexual abuse.

The school network, where the Irish Region of the Sisters of St Louis has no management or operational role, is governed by the child safeguarding practices and policies of the Department of Education and Skills (DES) in the Republic of Ireland and by those of the Department of Education in Northern Ireland. The sisters who are located in community houses and who carry out work in the dioceses or in other religious settings are governed by the safeguarding policies in these settings. The two young adult outreach projects referred to above have their own child protection policies.

The number of sexual abuse allegations, in the context of the historical scale of the work of the Irish Region of the Sisters of St Louis is low. The reviewers have noted correspondence from previous pupils on file which reflects both harsh physical treatment and also positive experience of care and warmth in the residential units.

The safeguarding review of the Sisters of St Louis was carried out on 18.06.2014, by two reviewers from the National Board of Safeguarding Children in the Catholic Church in Ireland (NBSCCCI). Interviews were held with the Regional Leader and the Designated Person. The case files relating to the 4 existing child sexual abuse allegations were read, as well as the St Louis Safeguarding Policy (2012) and a number of other files relating to safeguarding training, correspondence and other relevant matters. One file containing other allegations, was also reviewed

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

In carrying out this audit the reviewers acknowledge that the NBSCCCI's safeguarding standards, consisting of seven standards broken down into forty seven criteria, is a detailed framework geared to shape and direct the Church's safeguarding project in medium to large scale organizations (such as dioceses and larger congregations). A challenge presented by small congregations is how to implement a safeguarding structure, proportionate in size and in particular to limited interaction with children and young people, alongside a need to keep the safeguarding work alive in circumstances where practical implementation of the safeguarding policy is limited. Whilst this review considered all of the standards, those criteria which are not met and which have no active application in the current operational circumstances of the Institute have been denoted (*) and the assessment of safeguarding is based on the criteria which the reviewers considered to be applicable.

There are however some aspects of a safeguarding policy which should be regarded as core and a number of these require further attention by the Irish Region of the Sisters of St Louis, including those of:

- Awareness of contact points for statutory agencies and the need for reporting without delay, and clarity about the role of the Safeguarding Person as the single point of contact for all referrals
- Complaints Policy
- Internal Management process
- Guidance on recruitment and vetting practice
- Training needs assessment and training plan

The reviewers re-iterate that the Sisters of St Louis have largely withdrawn from direct work with children and young people in Ireland. Whilst there are a number of the review criteria which are not met and are not required in the current ministry of the St Louis Sisters, the reviewers have noted a number of areas where their safeguarding requirements are met partially and where work needs to be consolidated.

STANDARDS

This section provides the findings of the review. The template employed to present the findings are the seven standards, set down and described in the Church guidance, *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland*. This guidance was launched in February 2009 and was endorsed and adopted by all the Church authorities that minister on the island of Ireland, including the Sisters of St Louis. The seven standards are:

Standard 1 A written policy on keeping children safe

Standard 2 Procedures – how to respond to allegations and suspicions in the Republic of Ireland and Northern Ireland

Standard 3 Preventing harm to children:

- recruitment and vetting
- running safe activities for children
- codes of behaviour

Standard 4 Training and education

Standard 5 Communicating the Church’s safeguarding message:

- to children
- to parents and adults
- to other organisations

Standard 6 Access to advice and support

Standard 7 Implementing and monitoring the standards

Each standard contains a list of criteria, which are indicators that help decide whether this standard has been met. The criteria give details of the steps that a Church organisation - diocese or religious congregation - needs to take to meet the standard and ways of providing evidence that the standard has been met.

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

Standard 1

A written policy on keeping children safe

Each child should be cherished and affirmed as a gift from God with an inherent right to dignity of life and bodily integrity, which shall be respected, nurtured and protected by all.

Compliance with Standard 1 is only fully achieved when Sisters of St Louis meets the requirements of all nine criteria against which the standard is measured.

Criteria

Number	Criterion	Met fully or Met partially or Not met
1.1	The Church organisation has a child protection policy that is written in a clear and easily understandable way.	Met fully
1.2	The policy is approved and signed by the relevant leadership body of the Church organisation (e.g. the Bishop of the diocese or provincial of a religious congregation).	Met fully
1.3	The policy states that all Church personnel are required to comply with it.	Met fully
1.4	The policy is reviewed at regular intervals no more than three years apart and is adapted whenever there are significant changes in the organisation or legislation.	Met fully
1.5	The policy addresses child protection in the different aspects of Church work e.g. within a church building, community work, pilgrimages, trips and holidays.	Not met*
1.6	The policy states how those individuals who pose a risk to children are managed.	Met partially
1.7	The policy clearly describes the Church's understanding and definitions of abuse.	Met fully
1.8	The policy states that all current child protection concerns must be fully reported to the civil authorities without delay.	Met partially
1.9	The policy should be created at diocese or congregational level. If a separate policy document at parish or other level is necessary this should be consistent with the diocesan or congregational policy and approved by the relevant diocesan or congregational authority before distribution.	Met fully

*** Denotes that this criterion, whilst representing good safeguarding practice, is considered not to be 'active' in the circumstances of this congregation**

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

The Child Safeguarding Policy (2012) of the Irish Region of the Sisters of St Louis states that from earliest days, the Sisters of St Louis have been concerned with the care and education of young people. Recognizing the inherent dignity of each child, their aim has been “to create an environment in which children might grow towards their full potential physically, spiritually, mentally and emotionally”

The document states that the Institute see it as a sacred duty to protect the children in its care and that the safeguarding policy is based on gospel values and on the guidelines as outlined in Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland (2008). The Irish Region of the Sisters of St Louis notes that previous editions of this document were written and approved in 2002, 2005, and 2007.

The reviewers consider that Criteria 1.1 – 1.4 are met. The safeguarding policy, which is quite short and produced electronically, has been signed off by the Irish Regional Leader and the Regional Team and clearly states the need for full compliance by all sisters. The need to review the policy at three yearly intervals is recognized. Criterion 1.5 (child protection in different aspects of the Church’s work) is not addressed and is not seen as relevant by the sisters, given their age profile. The reviewers accept that, although not met, this criterion does not have active application in these circumstances. The safeguarding policy sets out a step by step procedure to be followed in the event of an allegation of child abuse against a member. This procedure, whilst it does describe an internal management process including the point at which canon law measures may be introduced, needs to:

- State that it is the role of the Designated Officer to ensure that the complaint is referred as soon as possible to the civil authorities (NBSCCCI’s guidelines Resource 2 and 15). Whilst paragraph 4 of the safeguarding policy affirms it is a guiding principle that any allegation of abuse is to be taken seriously and dealt with immediately by those responsible and referred to the relevant authorities, there remains ambiguity in relation to the timing of reporting to the civil authorities and the policy needs to be more explicit about the role of the Designated Officer in this respect.
- Address the relationship between the civil processes (eg police or child care social work investigation, referral to DPP etc) which may follow referral to the civil authorities and the internal actions (eg to decide whether restrictions on ministry are necessary pending the outcome of the former)
- Refer to the use of risk assessments where appropriate.

The reviewers have therefore concluded that Criteria 1.6 (Managing individuals who pose a risk to children), and 1.8 (reporting to the civil authorities without delay) are partially met. Criterion 1.7 (definitions of abuse) is met fully, as is Criterion 1.9 (appropriate level). The references in the policy to the use of an Advisory Group need also to be revised. The reviewers were informed that this group has not been in existence for some time, and were advised that the Irish Region of the Sisters of St Louis will consider the reviewers recommendation about joining the NBSCCCI’s National Case Management Reference Group (NCMRG).

RECOMMENDATION 1:

The Regional Leader and Designated Officer should ensure that the safeguarding policy aspects related to Standard 1 Criteria 1.6 (managing members who pose a risk to children) and 1.8 (reporting to the civil authorities) are reviewed and revised in accordance with NBSCCCI's *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland*. Criterion 1.8 should be addressed without delay in an interim amendment to the current policy.

RECOMMENDATION 2:

The Regional Leader and Designated Officer should discuss and consider joining the NBSCCCI's National Case Management Reference Group (NCMRG) for external advice and support in relation to new cases and existing cases as appropriate and that such a move is formally recognized in the safeguarding policy.

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

Standard 2

Management of allegations

Children have a right to be listened to and heard: Church organisations must respond effectively and ensure any allegations and suspicions of abuse are reported both within the Church and to civil authorities.

Compliance with Standard 2 is only fully achieved when the Sisters of St Louis meet the requirements of all seven criteria against which the standard is measured.

Criteria

Number	Criterion	Met fully or Met partially or Not met
2.1	There are clear child protection procedures in all Church organisations that provide step-by-step guidance on what action to take if there are allegations or suspicions of abuse of a child (historic or current).	Met partially
2.2	The child protection procedures are consistent with legislation on child welfare civil guidance for child protection and written in a clear, easily understandable way.	Met fully
2.3	There is a designated officer or officer(s) with a clearly defined role and responsibilities for safeguarding children at diocesan or congregational level.	Met fully
2.4	There is a process for recording incidents, allegations and suspicions and referrals. These will be stored securely, so that confidential information is protected and complies with relevant legislation.	Met partially
2.5	There is a process for dealing with complaints made by adults and children about unacceptable behaviour towards children, with clear timescales for resolving the complaint.	Not met
2.6	There is guidance on confidentiality and information-sharing which makes clear that the protection of the child is the most important consideration. The Seal of Confession is absolute.	Met partially
2.7	The procedures include contact details for local child protection services e.g. (Republic of Ireland) the local Health Service Executive and An Garda Síochána; (Northern Ireland) the local health and social services trust and the PSNI.	Not met

As already noted the step by step guidance in the policy needs to be revised to clearly establish the role of the Designated Person in referring to the civil authorities without delay and in recognizing that it is not his/ her role to carry out an investigation prior to the completion of the civil processes. Criterion 2.1 is therefore judged as partially met. The policy states the need to comply fully with civil guidelines in both jurisdictions and Criterion 2.2 is fully met, as is 2.3 relating to the appointment of a Designated Safeguarding Person. Whilst files are securely stored and references are made to the need to record, the process for recording incidents is not fully addressed in the safeguarding policy (as required by the National Guidance Resource 16) and Criterion 2.4 is judged as partially met. There is a single reference to a complaints procedure outside the context of possible abuse (as a ‘key issue’) but without any further discussion and Criterion 2.5 is assessed as not met. In relation to Criterion 2.6, there is reference under the heading of ‘principles and structures’ to the need to explain issues pertaining to confidentiality, but the issues are not clarified. This criterion is assessed as partially met. The safeguarding policy does not contain any reference to contact details for the relevant civil authorities and Criterion 2.7 is not met.

RECOMMENDATION 3:

The Regional Leader and Designated Officer should ensure that the safeguarding policy aspects related to the following Standard 2 Criteria 2.1 (step by step guidance); 2.4 (recording); 2.5 (complaints); 2.6 (confidentiality); 2.7 (contacts for civil authorities) are revised in accordance with the NBSCCCI’s guidelines.

The Terms of Reference governing reviews by NBSCCCI state:

To ascertain the full extent of all complaints or allegations, knowledge, suspicions or concerns of child sexual abuse, made to the Church Authority (Diocese/religious congregation/missionary society) by individuals or by the Civil Authorities in the period 1st January 1975 up to the date of the review, against Catholic clergy and/or religious still living and who are ministering/or who once ministered under the aegis of the Church Authority, and examine/review and report on the nature of the response on the part of the Church Authority.

Within the Irish Region of the Sisters of St Louis the allegations of child sexual abuse are in some cases intertwined with allegations of physical and emotional abuse. In the interests of openness and transparency, the reviewers were invited to read and comment upon all cases, even where these fell outside the terms of reference.

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

Table 1

Incidence of Child Sexual Abuse allegations received within the Religious Congregation against Sisters, from 1st January 1975 up to time of Review

Name of Congregation		
1	Number of Sisters against whom allegations have been made since the 1 st January 1975 up to the date of the Review.	4
2	Total number of allegations received by the Congregation since 1 st January, 1975	5
3	Number of allegations reported to An Garda Síochána/PSNI involving Sisters of the Congregation since 1 st January 1975.	3
4	Number of allegations reported to the HSC/HSE/TUSLA (or the Health Boards which preceded the setting up of the HSE,) involving Sisters of the Congregation since 1 st January 1975.	3
5	Number of Sisters (still members of the Congregation) against whom an allegation was made and who were living at the date of the review.	2
6	Number of Sisters against whom an allegation was made and who are deceased.	2
7	Number of Sisters against whom an allegation has been made and who are in part-time ministry.	1
8	Number of Sisters against whom an allegation was made and who are “Out of Ministry, but are still members of the Congregation”.	0
9	Number of Sisters against whom an allegation was made and who are retired	1
10	Number of Sisters against whom an allegation was made and who have left the Congregation.	0
11	Number of Sisters who have been convicted of having committed an offence or offences against a child or young person since the 1 st January 1975.	0

Note: in Row 2, an allegation was received regarding a male employee of The Northern Ireland Training School, run by the sisters. The PSNI was informed by the person making the allegation.

The reviewers have seen a total of 5 safeguarding files. As the table above indicates, a total of 4 cases (in 4 separate files) have been identified by the Irish Region of the Sisters of St Louis as relating to child sexual abuse. Having reviewed these files, the reviewers consider that the information about child sexual abuse is only clear in 2 of the cases (1 describes an alleged sexual assault by a sister on a young person, and the other refers to inappropriate touching and kissing) In the remaining 2 cases there is insufficient information. In one case a sexual abuse allegation

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

against one sister, which was made alongside physical/emotional abuse allegations against a total of 4 sisters, appears to have been withdrawn. In the other case the complainant alleged that she was interfered with by a sister, but there are no further details on the file. The information on file is insufficient to assess if the threshold for notification to the civil authorities has been reached. In the second case the file indicates that the complainant did not respond to attempts by the Irish Region of the Sisters of St Louis to engage further with her. The reviewers note that they have seen a fifth file which contains references to 3 cases which refer to poor physical treatment (2 of these refer to alleged actions by single sisters, and 1 identifies 3 sisters and 1 lay person). Furthermore, there is reference to an allegation relating to a male employee which was notified to the PSNI. There are no further details on record relating to this case.

In the majority of these instances the allegations relating to physical or sexual abuse refer to events which are several decades old and generally lack detail. In 3 (of the total of 7 cases seen in the 5 files) the allegations were referred to the Irish Region of the Sisters of St Louis by the PSNI or An Garda Siochana (with the consequence that there was no need for the sisters to report to them). In one of the more detailed sexual abuse allegations, the sisters did not refer to An Garda Siochana for 3 months and after protracted internal discussion. In the remaining 3 cases there is no record of reporting to An Garda Siochana. There is a very limited record of reporting to the civil child protection agencies (Social Services). This is recorded in just one case, after a time lapse of 7 years.. The safeguarding files are not well structured, nor do they contain all of the relevant safeguarding information. There is evidence on some files of victim outreach, whilst in others, litigation processes have taken precedence. None of the allegations have resulted in criminal conviction. The files do not contain reference to any internal process to risk assess cases or to determine the need for restrictions or other canonical measures.

As noted above, in one of the cases reviewed relating to sexual abuse, the process of considering the case internally and consulting the Advisory Body took three months. In one of the physical abuse cases the reviewers considered that there was some confusion about referring it to the Designated Safeguarding person. The policy needs to be explicit that the reporting is to the civil authorities and should take place without delay and needs to contain the relevant detail of contact points. This is addressed in Recommendation 1. It also needs to be clarified that the Designated Person is the single point of contact for all allegations of child abuse.

By its nature, a review by NBSCCCI seeks to highlight if all appropriate steps have been taken by the Irish Region of the Sisters of St Louis. Part of the challenge faced by the reviewers was the quality of the recording in so far as it was minimalist and confused as the allegations were a mixture of harsh treatment with references to physical and sexual abuse but without specific allegations. It is clear that the sisters were distressed by the information in the files and the possibility that their confreres may have harmed children.

The reviewers also read several letters from former residents of the training school in Northern Ireland which reflect extremely positively on the care received there. The reviewers also note that a former resident of this school made a statement to the Historical Inquiry in Northern Ireland which states that she received excellent care from the Sisters of St Louis..

RECOMMENDATION 4:

The Regional Leader and Designated Officer should ensure all future allegations are processed through the Designated Safeguarding Person for notification onwards to the civil authority agencies.

RECOMMENDATION 5:

The Designated person should take responsibility for all case management records and ensure that detailed notes are taken about all action taken in response to allegations using the NBSCCCI's case file template.

As part of the review contact was made with the statutory authorities to assess if any of those authorities had concerns about the management of allegations by the Sisters of St Louis. An Garda Síochána stated they had no concerns and limited contact. Contact was also made with TUSLA who stated *“The Sisters of Saint Louis have been categorised as Category 2 meaning a single child sexual abuse allegation was made against a member and where there is no current risk posed. An allegation of child sexual abuse made against a member was received to the Sisters of St Louis in May 2002 and was reported by the Sisters of St Louis to the relevant Gardai in August 2002. As the complainant did not wish to pursue the complaint the Gardai were not in a position to follow up same. No other allegations have been made or concerns held by the Sisters of St Louis regarding this sister or any other member. Of the sisters who are involved in ministry in schools, parishes and other agencies they are guided by the CP policies of their organisation. The Child Protection policy has yet to be reviewed as part of our process. In the meantime we have no concerns about this Religious Order”*.

The sisters indicated that they have not had any contact with Social Services in Northern Ireland. The reviewers wrote requesting information from the PSNI, but no response was received.

Standard 3

Preventing Harm to Children

This standard requires that all procedures and practices relating to creating a safe environment for children be in place and effectively implemented. These include having safe recruitment and vetting practices in place, having clear codes of behaviour for adults who work with children and by operating safe activities for children.

Compliance with Standard 3 is only fully achieved when the Sisters of St Louis meet the requirements of all twelve criteria against which the standard is measured. These criteria are grouped into three areas, safe recruitment and vetting, codes of behaviour and operating safe activities for children.

Criteria – safe recruitment and vetting

No.	Criterion	Met fully or Met partially or Not met
3.1	There are policies and procedures for recruiting Church personnel and assessing their suitability to work with children.	Not met
3.2	The safe recruitment and vetting policy is in line with best practice guidance.	Not met
3.3	All those who have the opportunity for regular contact with children, or who are in positions of trust, complete a form declaring any previous court convictions and undergo other checks as required by legislation and guidance and this information is then properly assessed and recorded.	Not met

Criteria – Codes of behaviour

No.	Criterion	Met fully or Met partially or Not met
3.4	The Church organisation provides guidance on appropriate/ expected standards of behaviour of, adults towards children.	Met partially
3.5	There is guidance on expected and acceptable behaviour of children towards other children (anti-bullying policy).	Not Met*
3.6	There are clear ways in which Church personnel can raise allegations and suspicions about unacceptable behaviour towards children by other Church personnel or volunteers ('whistle-blowing'), confidentially if necessary.	Not met*

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

3.7	There are processes for dealing with children’s unacceptable behaviour that do not involve physical punishment or any other form of degrading or humiliating treatment.	Not met*
3.8	Guidance to staff and children makes it clear that discriminatory behaviour or language in relation to any of the following is not acceptable: race, culture, age, gender, disability, religion, sexuality or political views.	Not met*
3.9	Policies include guidelines on the personal/ intimate care of children with disabilities, including appropriate and inappropriate touch.	Not met*

Criteria – Operating safe activities for children

No.	Criterion	Met fully or Met partially or Not met
3.10	There is guidance on assessing all possible risks when working with children – especially in activities that involve time spent away from home.	Not met*
3.11	When operating projects/ activities children are adequately supervised and protected at all times.	Not met*
3.12	Guidelines exist for appropriate use of information technology (such as mobile phones, email, digital cameras, websites, the Internet) to make sure that children are not put in danger and exposed to abuse and exploitation.	Not met*

*** Denotes that this criterion, whilst representing good safeguarding practice, is considered not to be ‘active’ in the circumstances of this congregation**

The reviewers acknowledge the limited contact that the Irish Region of the Sisters of St Louis have with children and therefore notes that the policy document is not well developed. Where the sisters have contact with children, they advised that this is governed by the commissioners of those services, for example in parish ministry by the diocese in which they work.

As it stands the current safeguarding policy does not refer to any guidance on safe recruitment or vetting, and Criteria 3.1, 3.2 and 3.3 are not met. The sisters have stated that they have no plans to recruit personnel or volunteers to work with children. However safe recruitment and vetting is regarded as a basic requirement in any child safeguarding policy and the Irish Region of the Sisters of St Louis should take steps to have formal policy in place which establishes the need for vetting in accordance with best practice.

The reviewers have noted that the policy refers to general conduct relating to children as a key practice issue, but refers the reader to the guidelines in each particular ministry. Criterion 3.4 is assessed as partially met. Whilst Criteria 3.5 – 3.12 are not met as they are not addressed in the safeguarding policy, the reviewers accept that they have very limited application in the specific contemporary circumstances of the Institute. The reviewers note that, whilst not spelt out in the Institute policy, the requirements in relation to prevention under Standard 3 in diocesan or other ministry settings would be fully binding on any St. Louis sisters who work in such environments.

RECOMMENDATION 6:

The Regional Leader and Designated Officer should ensure that Standard 3 is developed and that the safeguarding aspects related to safe recruitment and vetting (3.1 – 3.3) and expected behaviour towards children and young people (3.4) are addressed in the review of the policy.

Standard 4

Training and Education

All Church personnel should be offered training in child protection to maintain high standards and good practice.

Criteria

Number	Criterion	Met fully or Met partially or Not met
4.1	All Church personnel who work with children are inducted into the Church's policy and procedures on child protection when they begin working within Church organisations.	Met partially
4.2	Identified Church personnel are provided with appropriate training for keeping children safe with regular opportunities to update their skills and knowledge.	Met partially
4.3	Training is provided to those with additional responsibilities such as recruiting and selecting staff, dealing with complaints, disciplinary processes, managing risk, acting as designated person.	Met partially
4.4	Training programmes are approved by National Board for Safeguarding Children and updated in line with current legislation, guidance and best practice.	Met fully

The reviewers noted that the safeguarding policy states that it is the policy of the Irish Region of the Sisters of St Louis to ensure that training is provided and that best practice is promoted in all dealings with children. The reviewers were informed that the Designated Person has attended safeguarding training offered by the NBSCCCI and that some post the Ryan Commission report training has been carried out. Sisters also avail of diocesan based safeguarding training. Criterion 4.1 however requires that the Region should state that all staff who work with children are inducted into the Church's safeguarding policy and procedures.

The reviewers do not feel that there is sufficient evidence to conclude this criterion is fully met, nor is there evidence of any systematic approach to training, such as a training needs analysis. Overall sisters avail of opportunities as they arise, but not based on analysis of gaps or needs. The reviewers therefore consider that Criteria 4.1, 4.2 and 4.3 are partially met. Criterion 4.4 is fully met, as the Region is fully reliant on NBSCCCI's programmes.

RECOMMENDATION 7;

The Regional Leader and Designated Officer should ensure that Standard 4 is developed and that review of the policy states that uptake of training for all staff engaged in safeguarding is a priority (4.1); that a training needs assessment for the Region is carried out in respect of safeguarding (4.2); and that training is sourced to develop roles in relation to areas identified in this review such as the Designated Person, complaints, recruitment etc (4.3).

Standard 5

Communicating the Church’s Safeguarding Message

This standard requires that the Church’s safeguarding policies and procedures be successfully communicated to Church personnel and parishioners (including children). This can be achieved through the prominent display of the Church policy, making children aware of their right to speak out and knowing who to speak to, having the Designated Person’s contact details clearly visible, ensuring Church personnel have access to contact details for child protection services, having good working relationships with statutory child protection agencies and developing a communication plan which reflects the Church’s commitment to transparency.

Criteria

Number	Criterion	Met fully or Met partially or Not met
5.1	The child protection policy is openly displayed and available to everyone.	Met Partially
5.2	Children are made aware of their right to be safe from abuse and who to speak to if they have concerns.	Not met*
5.3	Everyone in Church organisations knows who the designated person is and how to contact them.	Met partially
5.4	Church personnel are provided with contact details of local child protection services, such as Health and Social Care Trusts / Health Service Executive, PSNI, An Garda Síochána, telephone helplines and the designated person.	Not met
5.5	Church organisations establish links with statutory child protection agencies to develop good working relationships in order to keep children safe.	Met partially
5.6	Church organisations at diocesan and religious congregation level have an established communications policy which reflects a commitment to transparency and openness.	Met partially

*** Denotes that this criterion, whilst representing good safeguarding practice, is considered not to be ‘active’ in the circumstances of this congregation**

The Irish Region’s safeguarding policy is available electronically, but is not directly available on the Irish Region’s website (although this does contain information about good safeguarding practice, as well as an e-mail address for further information). Criterion 5.1 is partially met and it is recommended that the policy is made publicly

available on the website. The policy does not refer to the need to have communication material for children about their right to be safe, as required in 5.2. However the reviewers accept that this criterion has limited application.

The reviewers had some concerns, already referred to, that some sisters in receipt of safeguarding information were unclear about the role of the Designated Liaison Person in relation to cases that were not of a sexual nature and steps need to be taken to clarify this role in order to fully meet Criterion 5.3.

Details of local child protection contacts are not included in the policy and the reviewers were told of some difficulty in identifying representatives from the statutory agencies with whom they need to have working relationships. Criterion 5.4 is assessed as not met, and 5.5 as partially met. Feedback from Tulsa and An Garda Siochana has indicated that these agencies are satisfied with their safeguarding relationship with the sisters. Whilst there is not a written communications policy, the reviewers were informed of activity eg minutes of the Regional leadership team which demonstrated that the child safeguarding agenda is active within the Irish Region. The reviewers recommend that the Irish Region give thought to developing a Safeguarding Committee which could include sisters from the community houses, to facilitate communication as well as training and general oversight and monitoring of safeguarding issues.

RECOMMENDATION 8:

The Regional Leader and Designated Officer must ensure that Standard 5 is developed, with particular reference to Criteria 5.1 (availability of policy); 5.3 (profile of designated person); 5.4 (contact details of civil agencies); 5.5 (links with civil agencies); 5.6 (communications policy); and that these are addressed in the review of the safeguarding policy.

RECOMMENDATION 9:

The Regional Leader and Designated Officer should consider the formation of a Safeguarding Committee, which will oversee the implementation of the safeguarding policy, develop and monitor a training plan, and develop and implement a communications policy.

Standard 6

Access to Advice and Support

Those who have suffered child abuse should receive a compassionate and just response and should be offered appropriate pastoral care to rebuild their lives.

Those who have harmed others should be helped to face up to the reality of abuse, as well as being assisted in healing.

Criteria

Number	Criterion	Met fully or Met partially or Not met
6.1	Church personnel with special responsibilities for keeping children safe have access to specialist advice, support and information on child protection.	Met partially
6.2	Contacts are established at a national and/ or local level with the relevant child protection/ welfare agencies and helplines that can provide information, support and assistance to children and Church personnel.	Met partially
6.3	There is guidance on how to respond to and support a child who is suspected to have been abused whether that abuse is by someone within the Church or in the community, including family members or peers.	Met partially
6.4	Information is provided to those who have experienced abuse on how to seek support.	Met partially
6.5	Appropriate support is provided to those who have perpetrated abuse to help them to face up to the reality of abuse as well as to promote healing in a manner which does not compromise children's safety.	Not met

The current position in relation to specialist support and advice, inasmuch as it is stated in the policy, is that the Designated Liaison Person should report in the first instance to the internal Advisory Body and would acquaint the Regional Leader. If a decision is made that the allegation is true or possibly true, a decision is made about possible restrictions. The reviewers were told that this would be assessed by the Regional leadership team. The document then mentions contact with civil authorities, but does not offer direction or details. The reviewers were told that the Advisory Body referred to in the policy has not been in existence for a number of years, as there has been no need to activate it. In the

Review of Safeguarding Practice in the Religious Congregation of the Irish Region of the Sisters of St Louis

event of allegations occurring now or in the future, the Irish Region of the Sisters of St Louis will consider using the NBSCCCI's National Case Management Reference Group (NCMRG) service. It is recommended that the Irish Region of the Sisters of St Louis seek formal membership of the NBSCCCI's National Case Management Reference Group (NCMRG) and that the use of this service for advice in relation to new allegations, or to new information in existing allegations, is formally recognized in the policy. Criterion 6.1 is assessed as partially met.

As already noted, the process described in the current policy needs to be amended without delay to ensure timely reporting to the civil authorities. The Irish Region's links with safeguarding issues at national or local level appear to be quite limited, and Criterion 6.2 is also assessed as partially met. The policy sets out the basic steps to be taken in the events of an allegation. It is adult centred, referring to the 'complainant', and guidance about responding to children is referenced, but is not set out. Criterion 6.3 is therefore assessed as partially met.

There is good evidence of survivor outreach in some files, with warm supportive letters and contacts between the Regional Leader and complainants. This practice is commended.

Criterion 6.4 is assessed as partially met and the Irish Region of the Sisters of St Louis should formulate a survivor support policy which is included in the review of the safeguarding policy.

In discussion with the Regional Leader and Designated Person, the reviewers note the process of informing accused sisters that allegations have been made. However the reviewers did not see any evidence on file or on the safeguarding policy about how the Irish Region proposed to support sisters who have been accused of harming children or perpetrating abuse. Criterion 6.5 has not been addressed.. The reviewers consider that adherence to Standard 6 requires a policy position in relation to work with perpetrators, even if Institute have not (yet) had to deal with the reality of this and that the Irish Region of the Sisters of St Louis needs to state its policy in the review.

RECOMMENDATION 10:

The Regional Leader and Designated Officer should ensure that Standard 6 is developed, with particular reference to Criteria 6.1 (advice and support); 6.2 (safeguarding contacts), 6.3 (responding to children), 6.4 (survivor policy) and 6.5 (support for those who have perpetrated abuse) and that these are addressed in the review of the safeguarding policy.

Standard 7

Implementing and Monitoring Standards

Standard 7 outlines the need to develop a plan of action, which monitors the effectiveness of the steps being taken to keep children safe. This is achieved through making a written plan, having the human and financial resources available, monitoring compliance and ensuring all allegations and suspicions are recorded and stored securely.

Criteria

Number	Criterion	Met fully or Met partially or Not met
7.1	There is a written plan showing what steps will be taken to keep children safe, who is responsible for implementing these measures and when these will be completed.	Met partially
7.2	The human or financial resources necessary for implementing the plan are made available.	Met Fully
7.3	Arrangements are in place to monitor compliance with child protection policies and procedures.	Met partially
7.4	Processes are in place to ask parishioners (children and parents/ carers) about their views on policies and practices for keeping children safe.	Not met*
7.5	All incidents, allegations/ suspicions of abuse are recorded and stored securely.	Met fully

**** Denotes that this criterion, whilst representing good safeguarding practice, is considered not to be 'active' in the circumstances of this congregation***

The reviewers have noted evidence from minutes of Regional leadership team meetings that child safeguarding issues are discussed and reviewed on a regular basis. Criterion 7.1 requires a written strategic safeguarding plan for each religious congregation, which assesses strengths and weaknesses and sets out a plan to address these and is assessed as partially met. Criterion 7.2 is considered of be met fully. Criterion 7.3 is also partially met through the Regional leadership team. The reviewers have already recommended consideration of a Safeguarding Committee to improve and monitor communication (see Recommendation 8). Criterion 7.4 does not have active application. The reviewers note that Criterion 7.5 is met fully.

RECOMMENDATION 11:

The Regional Leader and Designated Officer should ensure that Standard 7 is developed, with particular reference to Criteria 7.1 (strategic plan) and 7.3 (monitoring), and that these are addressed in the review of the safeguarding policy.

*Review of Safeguarding Practice in the Religious Congregation of the Irish Region of
the Sisters of St Louis*

The reviewers recognise that the Sisters of St Louis have a declining population in Ireland and have very limited ministry with children. The reviewers understand therefore that the policy document and practice reflects both these facts. It is the view of the reviewers that time and effort spent on improving the policy, clarifying structures, inducting and training the existing sisters on the St Louis policy will be time well spent and will quickly bring the policy and practice up to the expected national standards.

Recommendations

RECOMMENDATION 1 :

The Regional Leader and Designated Officer should ensure that the safeguarding policy aspects related to Standard 1 Criteria 1.6 (managing members who pose a risk to children) and 1.8 (reporting to the civil authorities) are reviewed and revised in accordance with NBSCCCI's *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland* . Criterion 1.8 should be addressed without delay in an interim amendment to the current policy.

RECOMMENDATION 2 :

The Regional Leader and Designated Officer should discuss and consider joining the NBSCCCI's National Case Management Reference Group (NCMRG) for external advice and support in relation to new cases and existing cases as appropriate and that such a move is formally recognized in the safeguarding policy.

RECOMMENDATION 3:

The Regional Leader and Designated Officer should ensure that the safeguarding policy aspects related to the following Standard 2 Criteria 2.1 (step by step guidance); 2.4 (recording); 2.5 (complaints); 2.6 (confidentiality); 2.7 (contacts for civil authorities) are revised in accordance with the NBSCCCI's guidelines.

RECOMMENDATION 4:

The Regional Leader and Designated Officer should ensure all future allegations are processed through the Designated Safeguarding Person for notification onwards to the civil authority agencies.

RECOMMENDATION 5:

The Designated person should take responsibility for all case management records and ensure that detailed notes are taken about all action taken in response to allegations using the NBSCCCI's case file template.

RECOMMENDATION 6:

The Regional Leader and Designated Officer should ensure that Standard 3 is developed and that the safeguarding aspects related to safe recruitment and vetting (3.1 – 3.3) and expected behaviour towards children and young people (3.4) are addressed in the review of the policy.

RECOMMENDATION 7;

The Regional Leader and Designated Officer should ensure that Standard 4 is developed and that review of the policy states that uptake of training for all staff engaged in safeguarding is a priority (4.1); that a training needs assessment for the Region is carried out in respect of safeguarding (4.2); and that training is sourced to develop roles in relation to areas identified in this review such as the Designated Person, complaints, recruitment etc (4.3).

RECOMMENDATION 8:

The Regional Leader and Designated Officer must ensure that Standard 5 is developed, with particular reference to Criteria 5.1 (availability of policy); 5.3 (profile of designated person); 5.4 (contact details of civil agencies); 5.5 (links with civil agencies); 5.6 (communications policy); and that these are addressed in the review of the safeguarding policy.

RECOMMENDATION 9:

The Regional Leader and Designated Officer should consider the formation of a Safeguarding Committee, which will oversee the implementation of the safeguarding policy, develop and monitor a training plan, and develop and implement a communications policy.

RECOMMENDATION 10:

The Regional Leader and Designated Officer should ensure that Standard 6 is developed, with particular reference to Criteria 6.1 (advice and support); 6.2 (safeguarding contacts), 6.3 (responding to children), 6.4 (survivor policy) and 6.5 (support for those who have perpetrated abuse) and that these are addressed in the review of the safeguarding policy.

RECOMMENDATION 11:

The Regional Leader and Designated Officer should ensure that Standard 7 is developed, with particular reference to Criteria 7.1 (strategic plan) and 7.3 (monitoring), and that these are addressed in the review of the safeguarding policy.

Review of Safeguarding in the Catholic Church in Ireland

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

1. To ascertain the full extent of all complaints or allegations, knowledge, suspicions or concerns of child sexual abuse, made to the Church Authority (Diocese/religious congregation/missionary society) by individuals or by the Civil Authorities in the period 1st January 1975 up to the date of the review, against Catholic clergy and/or religious still living and who are ministering/or who once ministered under the aegis of the Church Authority, and examine/review and report on the nature of the response on the part of the Church Authority.
2. If deemed relevant, select a random sample of complaints or allegations, knowledge, suspicions or concerns of child sexual abuse, made to the Church Authority by individuals or by the Civil Authorities in the period 1st January 1975 to the date of the review, against Catholic clergy and/or religious now deceased and who ministered under the aegis of the Church Authority.
3. Examine/review and report on the nature of the response on the part of the Church Authority.
4. To ascertain all of the cases during the relevant period in which the Church Authority
 - knew of child sexual abuse involving Catholic clergy and/or religious still living and including those clergy and/or religious visiting, studying and/or retired;
 - had strong and clear suspicion of child sexual abuse; or
 - had reasonable concern;
 - and examine/review and report on the nature of the response on the part of the Church Authority.

As well as examine

- Communication by the Church Authority with the Civil Authorities;
- Current risks and their management.

5. To consider and report on the implementation of the 7 safeguarding standards set out in *Safeguarding Children: Standards and Guidance Document for the Catholic Church in Ireland* (2009), including the following:
 - a) A review of the current child safeguarding policies and guidance materials in use by the Church Authority and an evaluation of their application;
 - b) How the Church Authority creates and maintains safe environments.
 - c) How victims are responded to by the Church Authority
 - d) What training is taking place within the Church Authority
 - e) How advice and support is accessed by the Church Authority in relation to victim support and assessment and management of accused respondents.
 - f) What systems are in place for monitoring practice and reporting back to the Church Authority.

Accompanying Notes

Note 1: Definition of Child Sexual Abuse:

The definition of child sexual abuse is in accordance with the definition adopted by the Ferns Report (and the Commission of Investigation Report into the Catholic Archdiocese of Dublin). The following is the relevant extract from the Ferns Report:

“While definitions of child sexual abuse vary according to context, probably the most useful definition and broadest for the purposes of this Report was that which was adopted by the Law Reform Commission in 1990¹ and later developed in Children First, National Guidelines for the Protection and Welfare of Children (Department of Health and Children, 1999) which state that “child sexual abuse occurs when a child is used by another person for his or her gratification or sexual arousal or that of others”. Examples of child sexual abuse include the following:

- *exposure of the sexual organs or any sexual act intentionally performed in the presence of a child;*
- *intentional touching or molesting of the body of a child whether by person or object for the purpose of sexual arousal or gratification;*
- *masturbation in the presence of the child or the involvement of the child in an act of masturbation;*
- *sexual intercourse with the child whether oral, vaginal or anal;*
- *sexual exploitation of a child which includes inciting, encouraging, propositioning, requiring or permitting a child to solicit for, or to engage in prostitution or other sexual acts. Sexual exploitation also occurs when a child is involved in exhibition, modelling or posing for the purpose of sexual arousal, gratification or sexual act, including its recording (on film, video tape, or other media) or the manipulation for those purposes of the image by computer or other means. It may also include showing sexually explicit material to children which is often a feature of the ‘grooming’ process by perpetrators of abuse.”*

Note 2: Definition of Allegation:

The term allegation is defined as an accusation or complaint where there are reasonable grounds for concern that a child may have been, or is being sexually abused, or is at risk of sexual abuse, including retrospective disclosure by adults. It includes allegations that did not necessarily result in a criminal or canonical investigation, or a civil action, and allegations that are unsubstantiated but which are plausible. (NB: Erroneous information does not necessarily make an allegation implausible, for example, a priest arrived in a

¹ This definition was originally proposed by the Western Australia Task Force on Child Sexual Abuse, 1987 and is adopted by the Law Reform Commission (1990) *Report on Child Sexual Abuse*, p. 8.

*Review of Safeguarding Practice in the Religious Congregation of the Irish Region of
the Sisters of St Louis*

parish in the Diocese a year after the alleged abuse, but other information supplied appears credible and the alleged victim may have mistaken the date).

Note 3: False Allegations:

The National Board for Safeguarding Children in the Catholic Church in Ireland wishes to examine any cases of false allegation so as to review the management of the complaint by the Diocese/religious congregation/missionary society.

Note 4: Random sample:

The random sample (if applicable) must be taken from complaints or allegations, knowledge, suspicions or concerns of child sexual abuse made against all deceased Catholic clergy/religious covering the entire of the relevant period being 1st January 1975 to the date of the Review.

Note 5: Civil Authorities:

Civil Authorities are defined in the Republic of Ireland as the Health Service Executive and An Garda Síochána and in Northern Ireland as the Health and Social Care Trust and the Police Service of Northern Ireland.