



Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

# Child Protection Policy

## Document History

### Document Location

The most current version of this policy is available on the HR Site on Plaza. Paper copies are valid only on the day they are printed. Refer to the owner if you are in any doubt about the accuracy of this document.

### Revision History

This document will be reviewed every two years and more frequently if necessary in response to changes in legislation, organisational developments and experience of the policy in practice.

<b>Date of this Revision:</b> January 2018		<b>Date of next Revision:</b> January 2020
Revision Number	Revision Date	Summary of Changes
0.1	January 2018	Policy created

### Approvals

This document requires the following approvals:

<b>Title:</b>	Head of Human Resources and Operations Committee
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### Distribution

This document has been distributed to the approvers listed above, plus:

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Unite Union
T&G Union

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# 1. Introduction

The Central Bank of Ireland (“the Central Bank”) is fully committed to safeguarding the well-being of all children with whom we engage in a limited capacity as part of Central Bank business. This policy on child protection reflects the Central Bank’s compliance with the requirements of the Children First Act of 2015 (the “Act”). The Central Bank is committed to promoting the rights of the child including the participation of children in matters that affect them.

## 2. Objective

The objective of this policy is to adopt the safest possible practices to minimise the risk of harm, or abuse, to children and to provide a guideline to staff that will ensure the safety of children<sup>1</sup>. The Central Bank aims to create a safe and healthy environment for children and is committed at all times to safeguarding their welfare as an organisation that, on occasion, invites children onsite.

The objectives of this policy are set out below;

- To foster a commitment to keep children safe from harm and display a child safeguarding statement.
- To complete a risk assessment of any potential for harm to a child while visiting the Central Bank and to use this in conjunction with the child safeguarding statement.
- To appoint a relevant person to be the first point of contact in respect of communicating the Central Banks’ child safeguarding statement.

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<sup>1</sup> In accordance with Section 2 of the Act, a child means a person under the age of 18 years, who is not or has not been married.

### 3. Scope

This policy applies to all Central Bank staff members, third party contractors and consultants.

### 4. Policy Details

#### 4.1 Compliance with the Act

The Central Bank has a number of obligations as set down by the Act because it qualifies as the provider of a “relevant service” in respect of a limited number of activities.

A relevant service under the Act includes any work or activity, which consists of the provision of educational, research, training, cultural, recreational, leisure, social or physical activities to children, whether or not for commercial or any other consideration.

Educational activities of the Central Bank relate to, for example, school visits and the onsite work-experience of second level students. Social activities may include, but are not limited to, events like the children’s Christmas party or the family visit day, where children are temporarily permitted onsite.

#### 4.2 Commitment to Child Protection

As the provider of a relevant service, the Central Bank has produced a risk assessment and child safeguarding statement (**Appendix 1**). It has further nominated relevant stakeholders to be the designated liaison in respect of Part 2 of the Act dealing with child safeguarding statements.

#### 4.3 Child Safeguarding Statement and Risk Assessment

The child safeguarding statement is a written statement that specifies the service being provided and the principles and procedures to be observed to ensure, as far as is practicable, that a child availing of the service is safe from harm.

The statement will include a written assessment of the risks and specify the procedures in place to address specific issues identified in the Act.<sup>2</sup>

The purpose of the risk assessment is to identify any potential harm that a child could suffer while availing of the relevant services, as explained in Section 5 below, in the Central Bank. It should be noted that ‘risk’ in this context is the risk of harm as defined under the Act<sup>3</sup>, and not a general health & safety risk. The Central Bank has used this risk assessment to prepare a child safeguarding statement that outlines how these risks will be managed. A risk assessment is an exercise where the Central Bank examines all aspects of its provision of the relevant service from a safeguarding perspective to establish whether there are any practices or features that have the potential to put children at risk.

The child safeguarding statement will be reviewed every two years and more frequently in response to changes in legislation or national guidance. It will be displayed on Plaza and publically on the external site as well. It will further be made available to all parents and guardians, Tusla, and members of the public upon request.

#### 4.4 Designated Liaisons

Designated liaisons are the staff appointed by the Central Bank to be the first point of contact in respect of the child safeguarding statement. They are responsible for ensuring that the standard reporting procedure is followed when reporting allegations or suspicions of child abuse. The designated liaison should record all reasonable concerns or allegations of abuse brought to their attention, and the actions taken in response to a concern or allegation of child abuse.

Please see **Appendix two** for a list of the designated liaisons. They will act as a liaison with outside agencies and as a resource person to any staff member who has child protection

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<sup>2</sup> Section 11(3) of the Act sets down the requirement that the Bank includes a written assessment of the risks of any potential for harm to a child while availing of the relevant service and specify the procedures that are in place to deal with issues as specified in Section 11(3) (a) to (g) in the Act.

<sup>3</sup> “Harm” under the Act means, in relation to a child—

- (a) assault, ill-treatment or neglect of the child in a manner that seriously affects or is likely to seriously affect the child’s health, development or welfare, or
- (b) sexual abuse of the child, whether caused by a single act, omission or circumstance or a series or combination of acts, omissions or circumstances, or otherwise.

concerns. The designated liaison is responsible for ensuring that the standard reporting procedure (see **Section 6**) is followed when reporting allegations or suspicions of child abuse to the Child and Family Agency (Tusla).

In respect of child safeguarding training and information, including the identification of the occurrence of harm, designated liaisons have completed the Tusla's eLearning programme on the Children First Act.

## 5. Relevant Services

The Central Bank is considered a provider of relevant services under the Act because it engages in work or activity that consists of the provision of educational, research, training, cultural, recreational, leisure, social or physical activities to children.

The Central Bank is also involved in corporate social responsibility (CSR) activities that bring staff into contact with children, in a limited capacity. This primarily involves, but is not limited to, activities that occur in education-based centers located in the surrounding community. All staff, who agree to participate, are Garda vetted by the host organisation where they are volunteering. When there is a scheduled CSR activity involving interaction between staff and children, the CSR co-ordinator will first contact the host organisation to ensure that they have their own child safeguarding statement and, further, that the Central Bank volunteers are thus guided by the organisations child safeguarding; policies, procedures, and the direction of their own Designated Liaison.

## 6. Reporting Procedures and Responsibilities

The reporting procedure for dealing with disclosures, concerns or allegations of child abuse is outlined in the following steps;

- Any staff member who has received a disclosure of child abuse, or who has reasonable concerns of abuse, should bring it to the attention of the designated liaison person immediately. The Head of Human Resources should also be informed of the situation.

- The designated liaison will assess and review the information that has been provided. The designated liaison may contact Tusla on a no-name basis for informal advice relating to the allegation, concern or disclosure.
- After consulting with Tusla, the designated liaison will then take one of two actions;
  - Report the allegation, concern or disclosure to Tusla. The designated liaison will always inform Tusla if reasonable grounds for concern exist, or;
  - Not make a formal report to Tusla, but keep a record of the concerns on file. Any actions taken because of a concern should be recorded. The reasons for not reporting the allegation, concern or disclosure will also be clearly recorded.
- The staff member who made the initial report will be given a clear written explanation of the reasons why the concern is not being reported to Tusla. It is then open to them to make a formal report, directly to the relevant authority, if they feel this is necessary.

A report to Tusla can be made in person, by telephone, in writing, or by email. Contact numbers for all Tusla offices are contained in **Appendix 3** and are available on their website [www.tusla.ie](http://www.tusla.ie). In an emergency, where Tusla is not available, and there is a concern for the safety of a child, then a report should be made directly to An Garda Síochána. In making a report on suspected or actual child abuse, the individual must ensure that the first priority is always for the safety and welfare of the child. Parents/legal guardians of the child will be informed of the allegation, concern or disclosure unless doing so is likely to endanger the child. All records relating to any incident relating to this policy will be retained in a secure place. The designated liaison will have access to relevant records when required. The retention of records will be in accordance with standard HR practice and the Central Bank's data protection policy.

## 7. Recruitment, Parental Consent and Legal Protections

All staff and contractors undergo Garda Vetting as part of the pre-employment induction process.



## 7.1 Parental Consent

A Purpose of Engagement Statement (see **Appendix 4**) must be signed by a parent/guardian in advance of any second level work placement in which they grant permission for their child to participate in the agreed activity.

## 7.2 Legal Protections

The Protections for Persons Reporting Child Abuse Act 1998 makes provisions for certain protections from civil liability of persons who have formed their opinion and communicated child abuse concerns 'reasonably and in good faith' to designated officers of the Child and Family Agency (Tusla) or to any member of An Garda Síochána.<sup>4</sup> These protections apply to organisations as well as to individuals. This Act also extends certain protections to employees whereby employers may not penalise employees for forming opinions and communicating concerns 'reasonably and in good faith' also.<sup>5</sup>

Any abuse allegation must be dealt with sensitively, and support and, if necessary, counselling may be provided. While the primary goal must be to protect the child, care must be taken to ensure that the staff member is treated fairly. It is critical that a proportionate response is taken to each case that arises specifically because of the nature and type of abuse that could be the subject of the allegation.

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<sup>4</sup> Section 3 of Protections for Persons Reporting Child Abuse Act 1998.

<sup>5</sup> Section 4 of Protections for Persons Reporting Child Abuse Act 1998.

## Appendix 1

### Child Safeguarding Statement

**1. Name of the service being provided:** Work or activity, which consists of the provision of educational, cultural, recreational, & social activities to children. The provision of educational activities to children include second level work experience and school visits. Further activities include, but are not limited to, sports & social activities like the Children’s Christmas Party or Wellness activities like the Family visit day.

**2. Nature of the service and principles to safeguard children from harm:** The mission of the Central Bank is “Safeguarding Stability, Protecting Consumers”. Central to delivering this mission is working to safeguard price and financial stability (the former in the context of the Eurosystem) and to undertake assertive risk-based supervision underpinned by a credible threat of enforcement.

In respect of safeguarding children from harm, the Central Bank has appointed relevant persons to be the first point of contact in respect of both communicating the safeguarding statement and acting as the designated liaison. As the designated liaison, they are responsible for ensuring that the standard reporting procedure is followed should there exists reasonable grounds for concern regarding allegations or suspicions of abuse.

### 3. Risk assessment

HR Advisory has carried out an assessment of any potential for harm to occur to a child while availing of our services. Below is a list of the areas of risk identified and the list of procedures for managing these risks.

	<b>Risk Identified</b>	<b>Procedure in place to manage risk identified</b>
<b>1</b>	No parental consent for child to be onsite for second level work placements.	Purpose of engagement form signed before placement.
<b>2</b>	Designated liaisons are not appropriately assigned.	Designated Liaisons are Garda vetted.

3	Designated liaisons may not recognise abuse or may not report a concern.	Designated liaisons have completed Tulsa's e-learning programme on the Children First Act.
4	Child safety is not understood by staff.	All staff are Garda vetted as part of induction process. The Bank's Child Protection Policy is available on Plaza.
5	Children may be alone while in the Central Bank.	Children will be supervised at all times.
6	Children may not have the means to report abuse.	Children will have access to phones/computers and a designated contact for the duration of their placement.
7	During CSR activities, children may be left alone with Staff.	CSR activities never occur on a one-to-one basis with a child and Staff are Garda vetted (by the host organisation) in advance of participation. Staff are further guided by host organizations' child safeguarding statement.

#### 4. Procedures

Our Child Safeguarding Statement has been developed in line with requirements under the Children First Act 2015, the *Children First: National Guidance*, and Tulsa's *Child Safeguarding: A Guide for Policy, Procedure and Practice*. In addition to the procedures listed in our risk assessment, the Central Bank has additional procedures to support our intention to safeguard children while they are availing of our educational services. These procedures may be found within the Central Bank's 'Child Protection Policy', which is accessible on Plaza and on our external website. The relevant procedures are listed below and the appropriate section of the Child Protection Policy outlining the procedure is also identified:

- Procedure for the management of allegations of abuse or misconduct against Central Bank staff by a child availing of our educational services (see Section 6 of the Child Protection Policy).

- Procedure for the safe recruitment and selection of staff to work with children (see Section 7 of the Child Protection Policy).
- Procedure for provision of and access to child safeguarding training and information, including the identification of the occurrence of harm (see Section 4.4 of the Child Protection Policy).
- Procedure for the reporting of child protection or welfare concerns to Tusla (see Section 6 of the Child Protection Policy).
- Procedure for appointing a relevant person (see Section 4.4 of the Child Protection Policy).

## 5. Implementation

We recognise that implementation is an ongoing process. The Central Bank is committed to the implementation of this Child Safeguarding Statement and the procedures that support our intention to keep children safe from harm while availing of services within our organisation.

This Child Safeguarding Statement will be reviewed in January 2020 or as soon as practicable after there has been a material change in any matter to which the statement refers.

For queries, please contact Katie Dunne from Resourcing in respect of second level work placements & Sinéad McKenna from Outreach & Engagement in respect of school visits. For Sports & Social activities involving children, please contact Jackie Pearson. In respect of Wellness activities, e.g. the Family visit day, please contact Kevin Owens from HR Advisory & Wellness. These are the Relevant Persons under the Children First Act 2015.

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Kevin Owens

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## Appendix 2

### Designated Liaisons

#### Second Level Work Placements

Katie Dunne, HR Resourcing.

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#### School Visits

Sinéad McKenna,

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#### Sports & Social Activities

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#### Wellness Activities (e.g. Family Visit Day)

Kevin Owens

[kevin.owens@centralbank.ie](mailto:kevin.owens@centralbank.ie)

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## Appendix 3

### Useful Support Numbers

- Child and Family Agency (Tusla) 01 771 8500
- Childline 1800 666 666
- Parentline (support for parents under stress) 1890 927 277
- Adult Counselling Services Free phone: 1800 23 4114
- Store Street Garda Station, 01 666 8000

## Appendix 4

### Purpose of Engagement Statement

This document must be signed by a parent /guardian and is for the purpose of granting permission for their child to participate in the agreed programme activity. Your signature confirms your acceptance and understanding of the Central Banks Child Protection Policy and procedures.

This form is available from HR on Plaza to download.

Name of child:

Age of child:

Name of Parents / Guardians:

Programme Title:

Location:

Date:

Signature:



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