

14. Child Safeguarding

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Introduction

The safety, protection, and welfare of children and young people is of paramount importance to ELI Schools. When parents entrust their children to our care, they expect and deserve the highest standards of safeguarding. ELI Schools has a legal, moral, and ethical duty to ensure that children and young people (persons under 18 years of age) participating in our programmes are protected from harm and that their welfare is promoted. This section establishes ELI Schools' comprehensive approach to child safeguarding, articulating our commitment, policies, procedures, and practices that ensure children are safe and protected while in our care.

Purpose and Scope

The purpose of this section is to:

- Establish ELI Schools' commitment to child safeguarding and child protection
- Define roles, responsibilities, and procedures for safeguarding children
- Ensure compliance with Children First Act 2015 and Children First National Guidance
- Provide clear procedures for recognizing, responding to, and reporting child protection concerns
- Establish standards for safe recruitment, supervision, and management of staff and programmes
- Create a culture of safeguarding where children's welfare is paramount

This section applies to:

- All junior programmes (programmes for under-18s)
- All children and young people under 18 years attending ELI Schools programmes
- All staff, volunteers, and others working with or having contact with children at ELI Schools
- All locations where junior programmes are delivered
- All activities involving children (classes, accommodation, activities, excursions, etc.)

Regulatory and Legal Context

ELI Schools' approach to child safeguarding is informed by and complies with:

- Children First: National Guidance for the Protection and Welfare of Children (2017)
- Code of Practice for Provision of Programmes of English Language Education to International Learners
- Criminal Justice Act 2012:
- National Vetting Bureau
- Data Protection Act 2018 and GDPR:

ELI Schools' Child Safeguarding Philosophy

Core Beliefs:

ELI Schools' approach to child safeguarding is founded on the following core beliefs:

- Children's Welfare is Paramount:**
 - Safety and welfare of children is our first priority, above all other considerations
 - When in doubt, child's best interests guide decisions
 - Children have right to be safe, protected, respected, and supported

- All Children Have Equal Right to Protection:**
 - Every child, regardless of age, ability, gender, race, religion, nationality, sexual orientation, or other characteristics, has equal right to protection
 - No discrimination in safeguarding
 - Particular attention to vulnerable children (disabilities, language barriers, isolation, etc.)

- Prevention is Better than Reaction:**
 - Proactive safeguarding culture prevents harm
 - Safe recruitment, supervision, training, policies, environment create safety
 - Vigilance and awareness enable early identification of concerns

- Everyone Has Responsibility:**
 - Safeguarding is everyone's responsibility (not just designated persons or management)
 - All staff, volunteers, host families have duty to protect children
 - Culture where concerns are raised, listened to, acted upon

- Child-Centered Approach:**
 - Children's voices heard (age-appropriate consultation and participation)
 - Children's experiences and perspectives considered
 - Services designed around children's needs and best interests

- Partnership:**
 - Safeguarding is partnership: ELI Schools, parents/guardians, host families, statutory authorities (Tusla, Gardaí), community
 - Cooperation and information sharing (within appropriate legal and ethical boundaries) protect children
 - Clear communication and coordination

- Transparency and Accountability:**
 - Safeguarding policies and practices transparent
 - Child Safeguarding Statement public
 - Accountability at all levels (Board, management, staff)
 - Regular review and continuous improvement

- Rights and Respect:**
 - Children have rights (UN Convention on the Rights of the Child)
 - Children treated with dignity and respect
 - Cultural sensitivity and respect for diversity
 - Balance of protection and empowerment (not overprotection that stifles development, but appropriate protection that keeps children safe)

Child safeguarding is not separate from quality assurance; it is integral to all aspects of provision for children.

Definitions

- Child / Young Person:**
- For purposes of safeguarding and Children First Act 2015: Person under 18 years of age
 - ELI Schools uses terms "child," "young person," "junior student" interchangeably for students under 18
- Child Abuse:**
- Harm to child by act or omission
 - Four main categories: Neglect, Emotional Abuse, Physical Abuse, Sexual Abuse (definitions in Children First Guidance - detailed below)
- Child Protection:**
- Protecting children from abuse or neglect
 - Responding to child protection concerns
 - Reporting to statutory authorities (Tusla, Gardaí)
- Child Safeguarding (broader than child protection):**
- All measures to promote children's welfare and protect them from harm
 - Includes: Prevention (safe policies, recruitment, training, environment), protection (responding to concerns), and promotion of welfare (positive experiences, support, empowerment)
- Mandated Person:**
- Under Children First Act 2015, certain professionals are "mandated persons" with legal duty to report child protection concerns to Tusla
 - Includes teachers (primary, post-primary, certain other education contexts)
 - ELI Schools' teachers may be mandated persons (if teaching in registered schools or in certain other capacities)
 - Even if not mandated persons, all ELI Schools staff have duty under our policies to report concerns to Designated Liaison Person
- Designated Liaison Person (DLP):**
- Person designated by organization to be first point of contact for child protection concerns
 - Receives reports of concerns from staff
 - Reports concerns to Tusla and Gardaí as appropriate
 - Manages safeguarding within organization
- Deputy Designated Liaison Person:**
- Deputy who acts when DLP unavailable
 - Ensures always someone available to receive and report concerns
- Tusla:**
- Tusla - Child and Family Agency
 - Statutory authority responsible for child protection in Ireland
 - Receives child protection reports
 - Investigates and intervenes to protect children
- Reasonable Grounds for Concern:**
- Standard for reporting child protection concerns to Tusla
 - Concern based on: Evidence (observed harm, disclosure, physical signs), information (told by reliable source), concern (professional judgment that child at risk)
 - Does not require proof; threshold is "reasonable grounds" not "certainty"
- Harm:**
- Ill-treatment or impairment of health or development (physical, intellectual, emotional, social, behavioural)
 - Includes harm caused by seeing or hearing ill-treatment of another

At ELI Schools:

DLP Responsibilities:

- Being first point of contact for child protection concerns at ELI Schools
- Receiving reports of concerns from staff, volunteers, host families, others
- Assessing concerns and determining appropriate response
- Reporting concerns to Tusla (child protection social work service) where reasonable grounds exist
- Reporting concerns to Gardaí (where appropriate - e.g., if criminal offense, emergency)
- Maintaining confidential records of concerns and reports
- Providing information and support to staff on safeguarding
- Liaison with Tusla, Gardaí, parents/guardians (in consultation with Managing Director)
- Ensuring parents/guardians informed appropriately (unless doing so would place child at further risk)
- Coordinating safeguarding within ELI Schools
- Leading safeguarding training (or arranging external training)
- Being available and accessible to staff and children

Qualifications/Training for DLP:

- Training in child protection (Tusla eLearning, Children First training, or equivalent)
- Understanding of Children First Act 2015 and National Guidance
- Senior staff member with authority and time to fulfil role
- Interpersonal skills, judgment, discretion, confidentiality

Deputy Designated Liaison Person:

- Acts when DLP unavailable (annual leave, sick leave, other absences)
- Same responsibilities, qualifications, training as DLP
- Always ensures someone available to receive and respond to concerns

14.1 Child Safeguarding Statement

Children First Act 2015 requires all organizations providing relevant services to children to have Child Safeguarding Statement.

ELI Schools Child Safeguarding Statement

ELI SCHOOLS - CHILD SAFEGUARDING STATEMENT

Date Published: 01/01/2026

Name of Service: ELI Schools (LT Education Abroad Limited trading as ELI Schools)

Nature of Service and Principles to Safeguard Children:

ELI Schools provides English language education programmes to international learners, including junior programmes for children and young people under 18 years of age. We are committed to creating and maintaining a safe environment for all children attending our programmes. The safety, protection, and welfare of children is paramount.

We recognize that:

- Children have a right to be protected from harm and abuse
- All children have equal right to protection
- Everyone working with children at ELI Schools has responsibility to safeguard children
- Child protection concerns must be reported to statutory authorities (Tusla) without delay

Our service is committed to:

- Creating a safe, respectful, nurturing environment for all children
- Safe recruitment, selection, and vetting of all staff and volunteers working with children
- Providing training to staff on recognizing and responding to child protection concerns
- Having clear procedures for responding to and reporting concerns
- Supervising children appropriately at all times
- Ensuring accommodation for children is safe and monitored

Working in partnership with parents/guardians, Tusla, Gardaí, and other agencies to protect children

1. Risk Assessment

We have carried out an assessment of any potential for harm to a child while attending our service. Below is a list of the areas of risk identified and the list of procedures for managing these risks:

Risk Identified	Procedure to Manage Risk
Harm by Staff or Volunteers - Risk of abuse or inappropriate conduct by staff or volunteers	Safe Recruitment: Garda vetting, references, interviews, safeguarding questions for all staff and volunteers working with children. Training: All staff trained in safeguarding, Code of Conduct, boundaries. Supervision: Children supervised; no one-to-one unsupervised contact in private. Monitoring: Teaching observations, performance management include safeguarding compliance. Reporting: Clear reporting procedures; DLP receives and acts on concerns. Disciplinary Action: Immediate action if staff breach Code of Conduct or harm child.
Harm in Accommodation - Risk of abuse, neglect, or unsafe conditions in host family or residential accommodation	Vetting: All host family adults Garda vetted. Residence staff vetted. Home Visits: Host family homes inspected before placement. Orientation: Host families trained on safeguarding, expectations, how to report concerns. Monitoring: Regular contact with junior students about accommodation; welfare checks by DLP or Programme Leader. Reporting: Host families and students know how to report concerns. Action: Immediate investigation if concern; child moved if necessary.
Harm During Activities and Excursions - Risk of accident, injury, abuse, or child going missing during activities	Risk Assessments: All activities and excursions risk assessed before proceeding. Supervision Ratios: Adequate supervision (minimum 1 adult to 15 children, higher ratio for younger children or higher-risk activities). Briefings: Children briefed on safety, behaviour, emergency procedures. Activity Leaders: Activity leaders vetted and briefed on safeguarding. Emergency Procedures: Staff trained in emergency response; emergency contacts available. Buddy System: Children paired or in small groups; regular headcounts.
Child-to-Child Harm - Risk of bullying, harassment, peer abuse among children	Prevention: Code of Conduct for students; expectations for respectful behaviour. Supervision: Children supervised; staff observe interactions. Awareness: Staff trained to recognize signs of bullying or peer conflict. Response: Immediate action if bullying or peer harm identified; support for victim, consequences for perpetrator, resolution. Serious Cases: Child-to-child sexual harm or serious assault reported to Tusla and Gardaí.
Online and Cyber Risks - Risk of online abuse, grooming, cyberbullying, access to inappropriate content	Acceptable Use Policy: Clear rules for internet and device use. Supervised Access: Internet access at school supervised and filtered. Awareness: Students educated on online safety. Monitoring: Staff aware of online risks, monitor for concerns. Response: Action if online harm identified; reporting as appropriate.
Abuse or Neglect at Home - Child may be experiencing abuse or neglect in home country or from parent/guardian	Awareness: Staff trained to recognize signs of abuse and neglect. Disclosure: If child discloses abuse at home, listened to and supported; reported to DLP who reports to Tusla. Response: Tusla advises on response; may involve liaison with child's home country authorities (complex international cases).

Procedures

We have procedures in place to address the risks identified. These procedures are detailed in Section 15 of our Quality Assurance Manual and include:

- Safe recruitment and vetting procedures
- Code of Conduct for staff and volunteers
- Training for all staff on child protection
- Procedures for recognizing and responding to child protection concerns
- Procedures for reporting concerns to Designated Liaison Person
- Procedures for reporting concerns to Tusla and Gardaí
- Procedures for managing allegations against staff
- Supervision standards and risk assessment procedures
- Accommodation vetting and monitoring procedures
- Anti-bullying procedures
- Missing child procedures
- Emergency procedures
- Confidentiality and information sharing protocols
- All staff are provided with these procedures and are trained on their implementation.

Implementation

This Child Safeguarding Statement has been:

- Developed in accordance with Children First Act 2015 and Children First National Guidance 2017
- Approved by the Board of Directors
- Made available to all staff, volunteers, students, parents/guardians
- Published on our website
- We are committed to implementing this Statement and to reviewing it regularly to ensure it remains current and effective.

**Designated Liaison
Person:**

- Name: Vourneen McGeough
- Email: [yourneen@elischools.com](mailto:vourneen@elischools.com)
- Mobile: +353 86 833 5560

The above Child Safeguarding Statement must be:

- Displayed prominently in school premises (notice board, reception)
- Published on ELI Schools website (dedicated safeguarding page)
- Provided to parents/guardians (sent with pre-arrival information for junior programmes)
- Provided to all staff (induction, staff handbook)
- Provided to host families
- Available to children (age-appropriate version or summary may be provided)
- Reviewed and updated regularly

14.2 Understanding Child Abuse

Understanding Child Abuse

All staff must understand what child abuse is, types of abuse, signs and symptoms.

Types of Child Abuse

Children First National Guidance identifies four main categories of abuse:

Neglect

Definition: Neglect is the ongoing failure to meet a child's basic physical, emotional, and/or psychological needs, likely to result in serious impairment of the child's health or development.

Examples:

- Failure to provide adequate food, clothing, warmth, hygiene, shelter, supervision
- Failure to protect child from danger or harm
- Failure to ensure access to appropriate medical care or treatment
- Lack of adequate supervision (leaving child alone, unsupervised in dangerous situations)
- Failure to provide emotional warmth, affection, attention
- Failure to ensure education (persistent non-attendance at school)

In ELI Schools Context:

- Child arrives consistently without adequate food, clothing inappropriate for weather, poor hygiene
- Child left unsupervised inappropriately (e.g., host family leaving young child alone for extended periods)
- Child's medical needs ignored (not taken to doctor when ill, medication not administered)
- Child consistently missing classes and no parental concern
- Child appears emotionally neglected (withdrawn, seeking excessive attention, no emotional warmth from caregivers)

Signs:

- Child looks undernourished, underweight, pale
- Poor hygiene (dirty clothes, body odour, unwashed, lice)
- Clothing inadequate for weather
- Child tired, lethargic, falling asleep in class
- Frequent illness, untreated medical conditions
- Delayed development
- Low self-esteem, poor social skills

Child taking on inappropriate caring roles (caring for younger siblings, excessive household responsibilities)

Emotional Abuse

Definition: Emotional abuse is the systematic emotional or psychological ill-treatment of a child, causing serious and persistent adverse effects on the child's emotional development.

Examples:

- Persistent criticism, belittling, humiliation, rejection
- Threatening, frightening, intimidating child
- Shouting, verbal aggression
- Imposing inappropriate expectations (beyond child's developmental capacity)
- Making child feel worthless, unloved
- Witnessing domestic violence (seeing or hearing ill-treatment of others in household)
- Serious bullying (including cyberbullying)
- Overprotection, limiting exploration and learning (extreme cases)

In ELI Schools Context:

- Host family or staff member persistently criticizing, humiliating child
- Child witnessing or experiencing verbal aggression, domestic violence in host family
- Persistent bullying by peers (if severe and not addressed, constitutes emotional abuse)
- Inappropriate pressure or expectations from parent, host family, or staff
- Child being isolated, rejected, made to feel unwanted

Signs:

- Low self-esteem, lack of confidence
- Withdrawn, anxious, fearful
- Difficulty forming relationships, lack of trust
- Inappropriate emotional responses (overly compliant, aggressive, attention-seeking)
- Developmental delay (speech, social skills)
- Self-harm, eating disorders, depression (in older children/young people)
- Reluctance to go home (to host family or home country)
- Child expresses feelings of worthlessness, rejection

Physical Abuse

Definition: Physical abuse is the deliberate physical injury to a child, or the wilful or neglectful failure to prevent physical injury or suffering.

Examples:

- Hitting, slapping, punching, kicking, shaking, biting, burning
- Throwing, pushing, poisoning
- Giving child alcohol or drugs
- Use of excessive force or inappropriate punishment
- Fabricating or inducing illness (Munchausen by proxy - rare)

In ELI Schools Context:

- Physical punishment by host family or staff member (hitting, slapping, etc.)
- Physical assault by peer (serious assault beyond normal childhood roughhousing)
- Excessive force used to restrain or manage child
- Child injured by adult's action or failure to prevent injury

Note: Physical punishment (corporal punishment) of children is **illegal in Ireland since 2015**. Hitting, smacking, slapping child is not permitted, even by parents. ELI Schools has zero tolerance for physical punishment by staff or host families.

Signs:

- Unexplained injuries (bruises, burns, fractures, cuts)
- Injuries in patterns (belt marks, handprints, cigarette burns)
- Injuries on unusual areas (inner arms, back, ears, face, stomach)
- Injuries inconsistent with explanation given ("walked into door" but has severe bruising)
- Frequent injuries
- Child flinching, fearful of physical contact
- Reluctance to undress for activities (hiding injuries)
- Wearing clothing to cover injuries (long sleeves in hot weather)
- Child or parent unable to provide credible explanation for injury
- Behavioural changes (aggression, withdrawal, fearfulness)

Sexual Abuse

Definition: Sexual abuse is any act whereby a child is used by another person for sexual gratification or sexual arousal, or for the sexual gratification or arousal of that person or other persons.

Examples:

- Any sexual activity with a child (penetrative or non-penetrative)
- Showing pornography to child
- Taking sexual images of child
- Encouraging child to engage in sexual activity or view sexual content
- Grooming (building relationship with child to sexually exploit them)
- Child prostitution or trafficking for sexual purposes
- Online sexual exploitation

Note: Children cannot consent to sexual activity. Sexual activity with child under 17 is illegal in Ireland (age of consent is 17). Even if child appears to "consent," it is abuse because child cannot legally or developmentally consent.

In ELI Schools Context:

- Sexual abuse by staff member, volunteer, host family member, peer, or other adult
- Staff member engaging in inappropriate sexual conversation, showing pornography, making sexual comments to child
- Host family member or other adult sexually abusing child
- Peer sexual abuse (older child sexually abusing younger child, or coercion between peers)
- Online sexual exploitation (grooming, sexting, sharing sexual images)

ELI Schools has zero tolerance for sexual abuse. Any indication of sexual abuse is immediately reported to Gardaí and Tusla.

Signs:

- Disclosure by child (child tells someone)
- Age-inappropriate sexual knowledge or language
- Sexual behaviour inappropriate for age (sexualized play, sexual language, inappropriate touching)
- Behavioural changes (withdrawal, aggression, fearfulness, regression to younger behaviour)
- Sleep disturbances, nightmares
- Eating disturbances
- Self-harm, suicidal thoughts (in older children/young people)
- Fear of specific person or place
- Reluctance to be alone with specific person
- Physical signs (pain, bleeding, bruising in genital or anal area, sexually transmitted infections, pregnancy)
- Running away, truancy
- Substance abuse (in older children/young people)

Additional Forms of Harm

Children First Guidance also identifies additional specific risks:

- Domestic Violence:**
- Child witnessing domestic violence at home (physical violence, emotional abuse between adults in household)
 - Adverse effects on child's emotional development
 - If child discloses or staff become aware, reported to DLP who reports to Tusla
- Trafficking:**
- Child brought to Ireland for exploitation (sexual, labour, criminal)
 - Rarely encountered in ELI Schools context but staff aware of possibility
 - If suspected, report to Gardaí and Tusla immediately
- Bullying (including Cyberbullying):**
- Persistent bullying is emotional abuse
 - All bullying addressed (anti-bullying procedures)
 - Serious or persistent bullying reported to DLP and may be reported to Tusla
- Peer Abuse:**
- Abuse by one child of another (physical, emotional, sexual)
 - Both victim and perpetrator may need support and intervention
 - Serious peer abuse reported to Tusla (both children may be in need of protection/support)

Signs and Symptoms of Abuse - Summary

Staff should be alert to:

- Physical Signs:**
- Unexplained injuries, bruises, burns, fractures
 - Poor hygiene, malnutrition, inappropriate clothing
 - Pain, bleeding, or signs of injury (especially in concealed areas)
 - Sexually transmitted infections, pregnancy (young person)
 - Frequent illness, untreated medical conditions
 - Tiredness, appearing unwell
- Behavioural Signs:**
- Behavioural changes (suddenly withdrawn, aggressive, anxious, fearful, overly compliant)
 - Regression (younger behaviour than age-appropriate)
 - Difficulty concentrating, poor school performance
 - Reluctance to go home or to specific place/person
 - Fear of specific people
 - Seeking excessive attention or affection from adults
 - Inappropriate sexual behaviour or knowledge
 - Self-harm, eating disorders, substance abuse (older young people)
 - Running away, truancy
 - Disclosure (child says something is wrong)
- Emotional Signs:**
- Low self-esteem, lack of confidence
 - Sadness, depression, anxiety
 - Anger, aggression
 - Withdrawn, isolated, difficulty forming relationships

14.3 Responding to Disclosure

If child discloses abuse to staff member, staff member must:

DO:

- Listen:**
- Stop what you're doing and give child your full attention
 - Listen calmly, without showing shock or disbelief
 - Let child speak at their own pace
 - Don't interrupt or prompt (don't put words in child's mouth)
- Believe:**
- Take what child says seriously
 - Believe the child (false allegations by children are rare; overwhelming majority of disclosures are genuine)
 - Don't question child's account or express doubt
- Reassure:**
- Tell child: "Thank you for telling me. You were right to tell me. I believe you."
 - Reassure child it's not their fault (children often feel blame or shame)
 - Tell child you will help them and keep them safe
 - Be calm and reassuring (even if you're shocked or upset internally, remain calm for child)
- Explain Next Steps:**
- Tell child you need to tell someone who can help (Designated Liaison Person)
 - Explain that you can't keep this secret because we need to make sure, they're safe
 - Don't promise confidentiality (you must report)
 - Age-appropriate explanation (for younger children: "I need to tell [DLP name] who helps children stay safe")
- Record:**
- As soon as possible after conversation (ideally immediately), write down exactly what child said (verbatim if possible)
 - Include: Date, time, location, who was present, what child said (exact words), what you said, child's demeanour, any physical signs observed
 - Factual, objective record (not interpretation)
 - Sign and date record
 - Give to DLP immediately
- Report To DLP Immediately:**
- Tell DLP about disclosure immediately (same day, ideally within hours)
 - Give DLP written record
 - DLP takes over (decides on reporting to Tusla)

If child discloses abuse to staff member, staff member must:**DON'T:**

- | | |
|---|---|
| Don't Promise Confidentiality: | <ul style="list-style-type: none">• Don't say "This is just between us" or "I won't tell anyone"• You must report, so can't promise to keep secret• Be honest: "I need to tell [DLP] so we can help you" |
| Don't Interrogate or Investigate: | <ul style="list-style-type: none">• Don't ask leading questions ("Did [person] touch you there?")• Don't ask for details beyond what child volunteers• Don't press child to say more• Your role is to listen and report, not to investigate (Tusla and Gardaí investigate) |
| Don't Make Promises You Can't Keep: | <ul style="list-style-type: none">• Don't promise child won't have to talk to anyone else (they may need to talk to social worker, Gardaí)• Don't promise abuser will be punished (that's for authorities to determine)• Don't promise everything will be okay (don't know how situation will unfold)• Be honest within age-appropriate limits |
| Don't React with Shock, Anger, Or Disbelief: | <ul style="list-style-type: none">• Child may be watching your reaction• Negative reaction may make child feel blame or regret telling• Stay calm, compassionate, neutral |
| Don't Contact Alleged Abuser: | <ul style="list-style-type: none">• Don't confront person child has named• Don't discuss disclosure with anyone except DLP (and later Tusla if DLP reports)• Could compromise investigation, put child at further risk |
| Don't Tell Parents/Guardians Without DLP Guidance: | <ul style="list-style-type: none">• Usually parents should be informed (and DLP will inform them or advise staff to inform them)• BUT if parent/guardian is alleged abuser, or if informing them would place child at further risk, they should NOT be informed (DLP and Tusla decide)• Wait for DLP guidance before contacting parents |
| Don't Discuss with Other Staff (Except DLP): | <ul style="list-style-type: none">• Confidentiality essential• Don't gossip or discuss in staff room• Only DLP, Managing Director, and those directly involved in child's care (on need-to-know basis) should be informed |
| Don't Minimize or Dismiss: | <ul style="list-style-type: none">• Don't say "Oh it's probably nothing" or "You must have misunderstood"• Don't talk child out of their account• Take seriously |

Responding to Other Concerns (Not Direct Disclosure)

If staff member has concern based on observation, signs, information received from third party, or instinct:

DO:

OBSERVE AND NOTE:

- Write down what you observed/heard/were told
- Factual, objective record
- Date, time, context, specific observations

REPORT TO DLP:

- Report concern to DLP as soon as possible (same day)
- Provide written record or email with details
- Express your concern even if you're unsure ("I'm concerned about [child] because [reason]")

LET DLP DECIDE:

- DLP will assess concern and decide on appropriate action
- Your role is to report, not to determine if it's serious enough
- Better to report and DLP decides "no action needed" than to not report and child suffer

DON'T:

DON'T INVESTIGATE:

- Don't question child in detail
- Don't contact parents, host family, or others to "check it out"
- Report to DLP; DLP and potentially Tusla investigate

DON'T DELAY:

- Report promptly
- Don't wait to "gather more evidence" or "see if it happens again"
- Immediate reporting protects child

DON'T ASSUME SOMEONE ELSE WILL REPORT:

- If you have concern, you report
- Don't assume colleague has reported or will report

14.4 Reporting Procedures

Clear procedures for reporting concerns internally (to DLP) and externally (to Tusla and Gardaí).

Step 1: Staff Member Identifies Concern

- Staff member has concern about child's safety or welfare (disclosure, observation, information received, concern about adult's behaviour, etc.)

Step 2: Staff Member Reports to DLP Immediately

How to Report:

- **In Person:** Speak to DLP directly (preferable for urgent or serious concerns)
- **Phone:** Call DLP (mobile number provided to all staff)
- **Email:** Email DLP with details (for less urgent concerns or to follow up verbal report with written record)
- **Out of Hours:** If concern arises outside office hours and is urgent:
 - Call DLP's mobile (DLP available for emergency calls)
 - If DLP unavailable, call Deputy DLP
 - If neither available and child in immediate danger, call Gardaí 999/112 and Managing Director, then inform DLP as soon as possible

What to Report:

- Child's name, age, programme
- Nature of concern (what happened, what was observed, what child said)
- Date, time, location
- Any physical signs observed and child's demeanour and behaviour
- Any other relevant information (context, previous concerns, etc.)
- Your concern and why you're concerned

Written Record:

- Provide written record of concern to DLP
- If disclosure, verbatim record of what child said
- Staff member signs and dates record
- Give original to DLP; staff member may keep copy (stored securely)

Step 3: DLP Acknowledges Receipt

- DLP acknowledges receipt of concern (verbal acknowledgment or email confirmation) and DLP thanks staff member for reporting
- DLP explains next steps (will assess and decide on action; will keep staff member informed on need-to-know basis)

Step 4: Confidentiality

- Staff member maintains confidentiality
- Does not discuss concern with other staff (except DLP, Managing Director)
- Does not discuss with parents/child/host family unless instructed by DLP

Step 5: DLP Assesses Concern

Reasonable Grounds for Concern exist when:

- Child has disclosed abuse
- There is specific indication (physical, behavioural, emotional) that abuse has occurred or is occurring
- Consistent signs or pattern indicating abuse
- Reliable information from credible source about abuse or risk
- Professional judgment/concern based on observations and knowledge of child

DLP considers:

- Nature and seriousness of concern
- Credibility of information
- Child's vulnerability
- Risk to child
- Context and any previous concerns

DLP reviews information and determines:

A. Is There Reasonable Grounds for Concern?

Three Possible Outcomes:

Outcome 1: Reasonable Grounds for Concern - Report to Tusla

- DLP determines there are reasonable grounds to believe child has been, is being, or is at risk of being abused or neglected

Action: Report to Tusla (and Gardaí if appropriate) - see below

Outcome 2: Concern But Not Reaching Threshold for Child Protection Report - Welfare Response

- Concern about child's welfare but not child protection concern
- Example: Child seems sad or stressed, minor concern about host family but no indication of abuse/neglect, child having difficulty adjusting

Action: Welfare response within ELI Schools:

- DLP or Student Services Officer checks in with child
- Contact with host family to discuss any concerns and provide support
- Monitoring child's welfare
- Contact with parents/guardians (inform them of concern and offer support)
- Additional support for child (pastoral care, counselling if needed)
- Record actions taken and monitor situation
- If situation worsens or further concerns, reassess and may report to Tusla

Outcome 3: No Concern / Concern Addressed

- After assessment, DLP determines no safeguarding concern (concern was misunderstanding, satisfactory explanation, etc.)
- Or minor issue addressed (e.g., concern about hygiene addressed by providing clean clothes, concern about lateness addressed by adjusting arrangements)

Action: No further action required; record concern and assessment; feedback to staff member

External Reporting: Reporting to Tusla

When DLP determines reasonable grounds for concern, must report to Tusla without delay.

DLP Prepares Report to Tusla

Information to Include in Report:

Tusla online reporting form (available on Tusla website) or phone report includes:

- **Reporter's details:** DLP name, title, organization (ELI Schools), contact details
- **Child's details:** Full name, date of birth, address (host family address or home address), nationality, parent/guardian details

Details of concern:

- Nature of abuse/neglect suspected (neglect, emotional, physical, sexual)
- What happened, when, where
- If disclosure: Exact words child used
- If observation: Specific signs observed
- If information from third party: Source and details
- **Child's current location and safety:** Where is child now? Is child in immediate danger?
- **Any immediate action taken:** Has child been moved to safety? Has alleged abuser been separated from child?
- **Names of any other parties involved:** Alleged abuser (if known), witnesses, other children affected
- **Any previous concerns or reports:** Has this child or family been involved with Tusla previously (if known)?
- **Consent to report:** Has parent/guardian been informed? (If not, explain why - e.g., parent is alleged abuser, informing would place child at risk)

DLP Submits Report to Tusla

How to Report:

Option 1: Online Report (Preferred):

- Tusla Child Protection and Welfare Report Form: www.tusla.ie (follow links to "Report a Concern")
- Complete form online
- Submit electronically
- Receive confirmation/reference number

Option 2: Phone Report:

- Call local Tusla Duty Social Work Team (contact details for each region on Tusla website)
- Office hours: Monday-Friday 9am-5pm
- Out of hours: Emergency Duty Social Worker available (contact through Gardaí 999/112)
- Provide information verbally
- Follow up with written report (email or post)

Option 3: Written Report:

- Download report form from Tusla website
- Complete and post or email to local Tusla office

Timeframe:

- Report to Tusla **without delay** (as soon as DLP determines reasonable grounds)
- Ideally same day concern identified; maximum within 24 hours

If child in immediate danger, report immediately (phone Tusla and Gardaí 999/112)

Tusla Acknowledges and Responds

- Tusla acknowledges receipt of report (may be immediate online confirmation, or phone/email acknowledgment)
- Tusla provides reference number for report
- Tusla assesses report and determines priority and response:
- **Emergency:** Immediate danger - Tusla responds immediately (within hours), working with Gardaí if needed
- **Priority:** Serious concern - Tusla responds within 24 hours
- **Non-priority but requires assessment:** Tusla responds within 20 working days
- Tusla may contact DLP for additional information
- Tusla decides on intervention (family support, child protection investigation, no further action)

DLP Cooperates with Tusla

- DLP (and ELI Schools) cooperate fully with Tusla's assessment and investigation
- Provide information as requested
- Facilitate access to child if needed (Tusla social worker may visit school to speak with child)
- Follow Tusla's guidance on informing parents, managing child's placement, etc.
- Keep Tusla informed of any developments or further concerns

Reporting to Gardaí (Police)

When to Report to Gardaí:

DLP reports to Gardaí (as well as Tusla) when:

A. Child in Immediate Danger:

- Emergency: Child at immediate risk of serious harm
- Call 999/112 immediately
- Example: Alleged abuser on premises and threatening child; child has been seriously assaulted; child being abducted

B. Criminal Offense:

- Concern involves potential criminal offense against child (physical assault, sexual abuse, serious neglect, etc.)
- Report to Gardaí as well as Tusla
- Gardaí investigate criminal aspect; Tusla assess child welfare/protection

C. Tusla Advises:

- After reporting to Tusla, Tusla may advise DLP to report to Gardaí (or Tusla may report to Gardaí themselves)

How to Report to Gardaí:

Emergency (Immediate Danger):

- Call 999 or 112
- Request Gardaí
- Explain situation (child in danger, location, nature of risk)
- Follow Gardaí instructions

Coordination:

- Gardaí and Tusla work together on child protection cases
- DLP may report to both (or Tusla reports to Gardaí, or vice versa)
- Clear communication ensures coordinated response

Informing Parents/Guardians

General Principle:

- Parents/guardians have right to be informed about concerns regarding their child
- Partnership with parents important
- Usually, DLP informs parents after reporting to Tusla

When to Inform Parents:

- After reporting to Tusla (unless Tusla advises otherwise)
- When Tusla gives clearance/guidance on informing parents

When NOT to Inform Parents (or Delay Informing):

- **If parent/guardian is alleged abuser:** Obviously do not inform alleged abuser before reporting to Tusla and Gardai (would compromise child's safety and investigation)
- **If informing parent would place child at further risk:** Example: Concern about family member or person close to family; parent may react by punishing child, preventing child from speaking to authorities, or removing child from jurisdiction
- **If Tusla advises not to inform:** Tusla may request that parents not be informed immediately to allow investigation to proceed (e.g., to secure evidence, to protect child, to interview child without parental pressure)
- **DLP consults with Tusla before informing parents to ensure informing is safe and appropriate.**

How to Inform Parents:

- Sensitively and professionally
- Phone call or meeting (not email for such serious matter)
- Explain: "We had a concern about [child]'s welfare. We have a duty to report concerns to Tusla (Child and Family Agency). We reported concern to Tusla on [date]. Tusla will be in contact with you. We are here to support [child] and you."
- Provide Tusla contact details
- Reassure that ELI Schools will continue to support child
- Listen to parent's concerns and questions
- Document conversation

If Parent is Alleged Abuser:

- Tusla and Gardai handle communication with alleged abuser
- ELI Schools cooperates with statutory authorities and follows their guidance

Documentation and Record Keeping

DLP Maintains Records

DLP maintains confidential records of all safeguarding concerns and reports:

Record Includes:

- Date concern reported to DLP
- Name of staff member reporting
- Details of concern (written record from staff member, DLP's notes)
- Child's details
- DLP's assessment (reasonable grounds? welfare response? no concern?)

Actions taken:

- If reported to Tusla: Date, time, method, Tusla reference number, Tusla's response
- If reported to Gardaí: Date, time, member of Gardaí spoken to, response
- If welfare response: Actions taken within ELI Schools
- If no further action: Rationale
- Communication with parents/guardians (date, method, content)
- Outcomes and follow-up
- Any ongoing monitoring or support

Records stored:

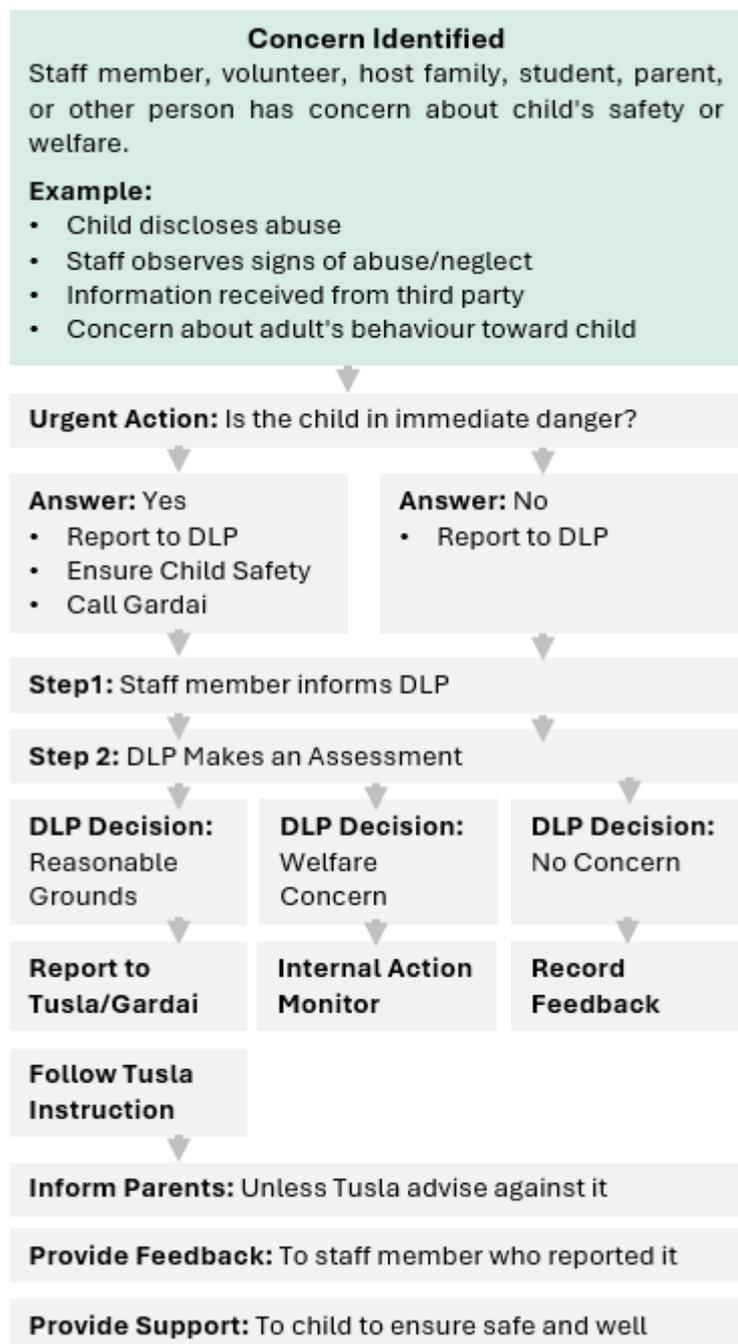
- Securely (locked cabinet or password-protected electronic file)
- Separately from child's general student file (safeguarding records are highly confidential)
- Access restricted (DLP, Deputy DLP, Managing Director only; disclosed to statutory authorities or others on need-to-know basis as appropriate)
- Retained indefinitely or for very long period (per Children First guidance - safeguarding information may be relevant decades later)

Feedback to Staff Member Who Reported

Step 12: DLP Provides Feedback to Staff Member

- DLP informs staff member that concern has been addressed (reported to Tusla, welfare response implemented, or no further action)
- Staff member does not need to know all details (confidentiality), but should know concern was taken seriously and acted upon
- Thank staff member for reporting
- Reinforce importance of vigilance and reporting
- Provide support to staff member if needed (debriefing, supervision)

Flowchart: Reporting Procedure



14.5 Safe Recruitment and Vetting

Preventing unsuitable people from working with children is first line of defence.

Safe Recruitment Principles

See Chapter 6 Staff Recruitment, Management and Development on Safe Recruitment at ELI Schools

Part F: Safe Recruitment and Vetting of Host Families

Vetting of Host Families

Host families accommodating children (under-18s) subject to rigorous vetting:

Step 1: Host Family Application

- Host family applies to ELI Schools to become host family
- Application form includes details of all household members, accommodation, experience

Step 2: Home Visit and Assessment

- Accommodation Officer or Student Services Officer visits home
- Assesses suitability: Safe, clean, adequate space, suitable environment for child, host family friendly and capable
- Meets all household members
- Discusses expectations, responsibilities, safeguarding

Step 3: Garda Vetting of All Adults in Household

- **All adults (18+) living in household Garda vetted** (not just host family parents but any adult household members - siblings, grandparents, lodgers)
- Children cannot be placed in home until all adults vetted and cleared
- If any adult in household has relevant conviction, home not approved

Step 4: References

- Host family provides references (personal references, or references from previous hosting experience)
- References checked

Step 5: Host Family Orientation and Training

- Host families attend orientation session (or receive comprehensive orientation pack)

Training includes:

- ELI Schools' expectations and standards
- Responsibilities of host family (care, supervision, meals, integration, reporting concerns)
- Child safeguarding (recognizing concerns, reporting to ELI Schools, appropriate boundaries, Code of Conduct)
- Cultural sensitivity and supporting international students
- Practical matters (payments, communication, emergencies)
- Host families sign agreement accepting terms and responsibilities

Step 6: Approval

- Host family approved for specific number and age of students
- Approval reviewed annually (re-vetting every 3 years, annual home visit)

Step 7: Ongoing Monitoring

- Regular contact with host families and students (welfare checks)
- Issues addressed promptly
- If safeguarding concern, immediate investigation and child moved if necessary
- Serious concerns reported to Tusla and Gardaí
- Host family approval can be withdrawn if concerns

Vetting of Third Parties

Third parties with regular unsupervised access to children (activity leaders, contractors, etc.) also vetted:

Examples:

- External activity leaders or coaches working with junior students regularly
- Counsellors or support staff

Requirements:

- If regular contact with children (weekly or more, or overnight/residential contact): Garda vetting required
- If occasional, supervised contact: May not require vetting, but always supervised by vetted ELI Schools staff (never alone with children)
- Service agreement or contract includes safeguarding requirements and Code of Conduct

Visitors and Contractors with Incidental Contact

Visitors to school premises (maintenance contractors, deliveries, inspectors, parents, etc.) may have incidental contact with children but are not working with children:

Safeguarding Measures:

- Visitors signed in at reception
- Visitors not left unsupervised with children
- Children supervised by staff; visitors do not have unsupervised access to children
- If contractor working on premises during junior programme, briefed on safeguarding (do not engage with children, report concerns if observed)

14.6: Supervision And Programme Management for Junior Programmes

Children require appropriate supervision at all times. Junior programmes designed and managed with safeguarding at forefront.

Supervision Principles

1. Adequate Supervision Ratios:

Minimum Supervision Ratios:

- Classes 1 adult:18 children maximum
- Activities/Museums 1 ELI Staff Member:35 children when there is a Group Leader with the group at a ratio of 1:15

Overnight/residential supervision: Enhanced supervision (adult supervisors sleeping in same building; night supervisor awake/on call)

Ratios may be adjusted based on:

- Age of children (younger children need more supervision)
- Activity risk level (higher risk = more supervision)
- Children's needs (children with disabilities or behavioural needs may need more supervision)
- Environment (unfamiliar environment, public spaces, water activities, etc.)

Supervision is active, not passive:

- Staff actively watching, interacting with, monitoring children
- Staff positioned to see all children
- Regular headcounts
- Staff alert and engaged (not on phones, not distracted)

Supervision at All Times:

Children supervised at all times during programme:

During School Hours:

- Classes: Teacher supervising class
- Breaks: Staff supervising (allocated supervision duties; staff on break rotation)
- Lunch: Supervised (staff eat with students or supervise lunch area)
- Common areas: Supervised

During Activities and Excursions:

- Staff accompany children on all activities and excursions
- Adequate supervision ratios maintained
- Risk assessment conducted before activity
- Emergency procedures in place

During Accommodation:

- Host families supervise children in homestay accommodation
- Residence staff supervise in residential accommodation
- Children not left unsupervised overnight (adult present in home/residence)

Travel:

- Children supervised during travel to/from school, activities
- If children travel independently (older young people, e.g., 16–17-year-olds), parental permission obtained and children briefed on safety

Supervision And Programme Management for Junior Programmes

1. Risk Assessment for All Activities:

Before any activity (class, excursion, sports, social activity), risk assessment conducted:

Risk Assessment Process:

- Step 1: Identify Activity Details**
- What: Description of activity
 - When: Date, time, duration
 - Where: Location
 - Who: Children involved (number, ages), staff supervising
 - How: Transport, equipment, arrangements

- Step 2: Identify Hazards and Risks**
- What could go wrong?
 - What hazards present? (physical hazards, health hazards, safeguarding risks, getting lost, accidents, contact with strangers, etc.)
 - Who could be harmed and how?

- Step 3: Evaluate Risks**
- Likelihood (how likely is it to happen?)
 - Severity (how serious would consequences be?)
 - Risk level: High, Medium, Low

- Step 4: Identify Control Measures**
- What measures will be put in place to reduce or eliminate risks?
 - Supervision (adequate ratios, specific supervision arrangements)
 - Briefings (brief children on safety, behaviour, staying with group)
 - Equipment (appropriate equipment, safety gear)
 - Emergency procedures (first aid, emergency contacts, evacuation plan)
 - Environment (choose safe location, avoid hazards)
 - Permissions (parental consent, medical information, emergency contacts)

- Step 5: Review and Approve**
- Programme Leader reviews risk assessment
 - If high-risk activity, Senior Academic Manager or Managing Director approves
 - Risk assessment documented

- Step 6: Implement and Monitor**
- Control measures implemented during activity
 - Staff monitor (are control measures working? Any new hazards?)
 - Debrief after activity (did everything go safely? Lessons learned?)

Risk Assessment Template:

Activity	Excursion to Glendalough	
Location	Glendalough, Co. Wicklow	
Date	15/07/2026	
Staff	3 staff: [Names]	
Children (no.)	30 students (ages 14-16)	
Hazard	Risk Level	Control Measures
Children getting lost / separated from group	Medium	- Buddy system (students in pairs, check on buddies)- Regular headcounts (every 30 mins)- Students briefed (stay with group, designated meeting point if separated)- Staff carry mobile phones- Students have emergency contact card- High-vis vests for staff (easily identifiable)
Injury during hiking (slips, falls, sprains)	Medium	- Choose appropriate trail for age/ability- Brief students on safety (watch step, stay on path, appropriate footwear)- First aid kit carried by staff- Staff trained in first aid- Emergency plan (how to get help if serious injury)
Weather (exposure, hypothermia if cold/wet)	Low (summer)	- Check weather forecast- Students briefed to bring appropriate clothing, water- Shelter available (visitor centre)
Contact with strangers	Low	- Students supervised- Students briefed (stay with group, do not wander off with strangers)- Staff vigilant
Transport accident (bus)	Low	- Use reputable transport provider- Seatbelts used- Driver licensed and insured- Emergency procedures known
Approved by:	[Programme Leader] Date: [Date]	

Clear expectations for children's behaviour:

- Code of Conduct for students (respectful behaviour, following instructions, staying with group, no bullying, appropriate language, etc.)
- Communicated to students at induction
- Positive behaviour management (praise good behaviour, clear consequences for poor behaviour)
- Serious misbehaviour addressed (meeting with student, contact with parents, consequences - loss of privileges, exclusion from activities if safety risk, etc.)

Anti-Bullying:

- Zero tolerance for bullying
- Students briefed on what bullying is and how to report
- Staff vigilant for signs of bullying
- Bullying addressed immediately (support for victim, consequences for bully, resolution, monitoring)
- Serious or persistent bullying reported to DLP and parents; may be reported to Tusla if constitutes emotional abuse

14.7 Training

All staff working with children trained in child safeguarding. **Mandatory Safeguarding Training:**

- Children First Act 2015 and National Guidance:**
 - Legal obligations
 - Definitions of abuse
 - Mandatory reporting
 - Roles and responsibilities
- Recognizing Child Abuse:**
 - Types of abuse (neglect, emotional, physical, sexual)
 - Signs and symptoms
 - How to recognize concerns
- Responding to Disclosures:**
 - How to respond if child discloses
 - Listening, believing, reassuring
 - What to do and what not to do
- Reporting Procedures:**
 - How to report concerns to DLP
 - DLP's role and responsibilities
 - Reporting to Tusla and Gardaí
- Code of Conduct:**
 - Professional boundaries
 - Appropriate behaviour when working with children
 - Safeguarding in day-to-day practice
- ELI Schools' Policies and Procedures:**
 - Child Safeguarding Statement
 - Safeguarding policies and procedures (Section 15)
 - Role-specific procedures (supervision, risk assessment, accommodation monitoring, etc.)

Training Methods:

Option 1: Tusla eLearning (Recommended):

Free online training provided by Tusla:

www.tusla.ie/children-first/children-first-e-learning-programme

"Introduction to Children First" (2 hours) - suitable for all staff

"Mandated Persons" (additional module for mandated persons)

- Self-paced online modules
- Certificate issued on completion

Option 2: Face-to-Face Training:

- In-house training delivered by DLP or external trainer (safeguarding expert)
- Interactive, tailored to ELI Schools context
- Opportunity for questions and discussion
- May be delivered as part of induction or annual staff development day

Option 3: Blended:

- Tusla eLearning plus in-house session for ELI Schools-specific policies and Code of Conduct

Induction Training:

- All new staff complete safeguarding training within first month of employment (ideally within first week)

No staff member works unsupervised with children until safeguarding training completed

14.8 Record Keeping and Confidentiality

Safeguarding records maintained with strict confidentiality and security.

Types of Safeguarding Records

HR Manager maintains training records:

- Who has completed training
- Date of training
- Type of training (Tusla eLearning, in-house, etc.)
- Certificate (copy filed)
- Refresher training due dates
- Signed and dated

DLP maintains:

1. Child Protection Concerns Records:

- All concerns reported to DLP
- DLP's assessment and actions
- Reports to Tusla/Gardaí
- Correspondence with Tusla, Gardaí, parents
- Outcomes and follow-up
- For each child where concern arose

2. Allegations Against Staff Records:

- All allegations against staff
- Investigation process and findings
- Outcomes
- Correspondence
- For each staff member against whom allegation made

3. Safeguarding Training Records:

- Who has completed training, when, type of training
- Maintained by HR Manager; copy provided to DLP

4. Host Family Vetting and Monitoring Records:

- Vetting certificates for host families
- Home visits and assessments
- Welfare checks
- Issues and resolution
- For each host family

5. Risk Assessments:

- Risk assessments for activities involving children
- Filed by Programme Leader; copy to DLP

6. Safeguarding Incidents and Near Misses:

- Any incidents or near misses with safeguarding implications (e.g., child almost left unsupervised, allegation that wasn't substantiated but raised concerns about procedures, etc.)
- Lessons learned

Physical records: Locked cabinet, access restricted

Electronic records: Password-protected files, encrypted, access restricted

- Stored separately from general student/staff files (safeguarding records are more sensitive)
- Only DLP, Deputy DLP, Managing Director have access

14.9 Missing Child Procedure

Clear procedure if child goes missing.

Definition: Missing child is child whose whereabouts are unknown and who cannot be located

- Step 1: Immediate Search**
- Scenario A: During School/Activity (Child Missing from Class, Activity, Excursion):**
- Staff immediately searches immediate area (classroom, school building, nearby area)
 - Other staff and children asked if they've seen child
 - Quick, focused search (5-10 minutes)
- Scenario B: Child Has Not Returned to Host Family:**
- Host family expected child to return by certain time (e.g., after school, after activity, curfew time)
 - Child has not returned and is not answering phone
 - Host family searches home (in case child is in room, asleep, etc.)
 - Host family tries to contact child (phone, messaging)
- Step 2: Alert Management**
- If child not found in immediate search (after 5-10 minutes):**
- Staff or Host Family Contacts:**
- DLP or Managing Director** (immediately, regardless of time)
- Information Provided:**
- Child's name, age, description (clothing, appearance)
 - When child last seen, where, by whom
 - Where child should be (expected location)
 - Any relevant context (was child upset? Did child say anything about going somewhere? Any concerns about child's state of mind or safety?)
- Step 3: Wider Search and Alerts**
- A. Expanded Search:**
- Staff search wider area (school premises, nearby streets, parks, shops, places child might have gone)
 - If excursion: Search venue and surrounding area, check with venue staff
- B. Contact Child:**
- Attempt to contact child (phone, messaging, social media if appropriate)
 - Contact child's friends (other students) - ask if they know where child is
- C. Contact Host Family / School (depending on context):**
- If child missing during school, contact host family (is child at home?)
 - If child missing from host family, contact school/Programme Leader (is child at school or with activity?)
- D. Check Known Locations:**
- Places child might have gone (friends' houses if known, places child mentioned, transport hubs if concern child trying to leave)
- If child not found within over 30 minutes:**
- DLP or Managing Director contacts parents/guardians:**
- Inform parents child is missing
 - Provide details (when last seen, search efforts, next steps)
 - Ask parents: "Do you have any idea where [child] might be? Has [child] contacted you?"
 - Reassure parents everything being done to find child
 - Keep parents updated

Step 4: Contact Gardaí **If child not found within 30 minutes - 1 hour** (depending on circumstances and risk assessment), or immediately if serious risk:

Contact Gardaí (999 or 112):

Report:

- Missing child
- Child's details (name, age, nationality, description, clothing, photo if available)
- When and where last seen
- Circumstances (was child upset, at risk, any concerns about child's welfare or safety)
- Search efforts already undertaken
- Contact details for ELI Schools, host family, parents

Gardaí Response:

- Gardaí will attend, coordinate search, issue alerts if necessary
- Gardaí may interview staff, host family, other students
- Gardaí decide on wider search, media appeal, etc.

Timeframe for Contacting Gardaí:

- **Immediate (call 999/112 immediately):** If child at high risk (young child, child with medical condition, child known to be suicidal or in crisis, concern child has been abducted, dangerous circumstances - e.g., missing at night in bad weather)
- **Within 30 minutes - 1 hour:** If standard risk (older child/young person, no specific safety concerns but missing and cannot be located)
- **Use judgment:** DLP and Managing Director assess risk; err on side of caution (better to call Gardaí who arrive and child then found, than delay and child come to harm)

Step 5: Contact Tusla **If child missing and safeguarding concern (child may be at risk, may be running away due to abuse, etc.):**

- DLP contacts Tusla (inform Tusla of missing child and any safeguarding concerns)
- Tusla provides guidance, may become involved

Step 6: Child Found **When child found:**

Immediate Actions:

- Ensure child is safe and unharmed
- Check child's physical and emotional state (is child injured, distressed, unwell?)
- Provide care and reassurance
- Medical attention if needed

Notify:

- Gardaí (inform child found safe)
- Parents (inform immediately, reassure)
- DLP and Managing Director
- Host family
- Staff who were searching

Step 7: Child Found Debrief:

- Speak to child (age-appropriately, sensitively): "We were worried about you. What happened? Where were you?"
- Understand why child went missing (got lost, ran away, lost track of time, etc.)
Assess any underlying issues (safeguarding concern, child unhappy, child at risk, etc.)

Follow-Up Actions:

- If child simply got lost or miscommunication: Reinforce safety expectations, ensure child understands importance of staying with group and communicating
- If child ran away or underlying issues: Investigate thoroughly (safeguarding concern? Accommodation issue? Child's welfare assessed; report to Tusla if child protection concern)
- Support for child (pastoral care, counselling if traumatic)
- Review and learn: What can be improved to prevent recurrence? (supervision, communication, risk assessment, etc.)

Step 8: Document incident thoroughly:

- Documentation**
- Timeline (when child last seen, when discovered missing, actions taken, when found)
 - People involved
 - Circumstances
 - Outcome
 - Lessons learned and actions to prevent recurrence
 - Report filed by DLP

Step 10: Review and Prevention**After incident:**

- Serious incident review (what happened? Why? Could it have been prevented? What needs to change?)
- Improvements implemented (e.g., if child got separated on excursion, improve supervision procedures, buddy system, more frequent headcounts)
- Staff briefed on lessons learned

14.10 Managing Allegations Against Staff

Types of Allegations

Allegations may include:

- | | |
|---|---|
| Against Teaching or Programme Staff: | <ul style="list-style-type: none"> • Inappropriate physical contact or boundary violations with children • Verbal abuse, humiliation, or threatening language toward children • Inappropriate sexual comments, behaviour, or grooming • Failing to report concerns or protect children • Violating supervision or duty of care requirements • Assault, injury, or physical abuse of children • Providing alcohol, drugs, or other harmful substances to children • Creating unsafe or unhygienic conditions • Discrimination or abuse based on protected characteristics |
| Against Non-Teaching Staff (Reception, Operations, Accommodation Staff): | <ul style="list-style-type: none"> • Inappropriate interactions with children in care • Boundary violations or inappropriate conduct • Failing to report concerns or protect children • Inappropriate physical contact • Verbal abuse or threats |
| Against Host Families (Accommodation): | <ul style="list-style-type: none"> • Inappropriate conduct or behavior toward child residents • Failing to provide adequate care or safety • Abuse or neglect • Boundary violations • Creating unsafe environment |
| Against Volunteers or Other Adults: | Any conduct that may harm or endanger children |

Immediate Actions to Protect Child

When Allegation Received Immediately after allegation received and assessed, the following actions taken to protect child:

- 1. Ensure Child Safe:** Follow
 - 14.3 Responding to Disclosure and
 - 14.4 Reporting Procedures
- 2. Precautionary Suspension**
 - Precautionary suspension is a neutral safeguarding measure (not disciplinary action or assumption of guilt) used to:
 - Remove potential risk to children while investigation proceeds
 - Separate alleged perpetrator from children and work environment
 - Reduce opportunity for intimidation or interference with investigation
 - Signal seriousness of allegation
 - Purpose**
 - Demonstrate commitment to child protection
 - Decision to Suspend**
 Managing Director (in consultation with DLP and HR Manager)
 If Managing Director is alleged perpetrator: Board Chair or DLP
 Decision documented with rationale
 - Criteria for Suspension:**
 - Allegation relates to potential harm to children
 - Allegations is sufficiently serious to warrant precautionary measure
 - Risk assessment indicates ongoing risk to children if person remains at work
 - Suspension necessary to protect children while investigation proceed

Suspension is NOT**Appropriate If:**

- Allegation relates to adult-only matter (no child protection concern)
- Allegation is clearly unfounded or lacks credibility
- Person's role has no contact with children

Precautionary Suspension**Process****1. Formal Notice:**

- Managing Director (or HR Manager on behalf) meets with person being suspended
- Formal letter issued explaining:
 - Suspension decision and effective date
 - Reason for suspension (allegation exists, suspension is safeguarding measure, not disciplinary)
- Explicit statement that suspension is not assumption of guilt or finding of misconduct
- Duration of suspension (typically pending outcome of investigation)
- Expectation of confidentiality
- Contact person for communication during suspension
- Any conditions of suspension (e.g., no contact with alleged victim, no discussion of allegation with colleagues)
- Financial arrangements during suspension (typically paid suspension to avoid undue hardship)
- Right to representation or support during meeting
- Right to respond to allegations or seek clarification

2. Support and Communication:

- Person advised of support available (counselling, legal representation, union support if applicable)
- Person provided with contact for clarification or questions
- Clear communication on pay, benefits, and any other employment arrangements
- Arrangements made for coverage of their duties
- Confidentiality emphasized to all staff

3. Information Management:

- Allegation and suspension kept confidential
- Discussed only on need-to-know basis
- Other staff informed only that person is suspended (general terms)
- Children/parents informed only if necessary for their understanding/safety
- No unnecessary disclosure to colleagues, agents, or external parties

4. Duration:

- Suspension continues pending investigation outcome
- Typically concluded within reasonable timeframe (investigation timeframe may vary: 2-8 weeks depending on complexity)
- If investigation not concluded within reasonable time, decision made about continued suspension or return to work with conditions
- Suspension reviewed if circumstances change

5. Conditions of Suspension:

- No contact with alleged victim or witnesses
- No discussion of allegations with colleagues
- No access to workplace systems or premises (unless authorized)
- Availability for interviews and investigation participation
- Compliance with any other conditions imposed

Types of Investigations

Internal Investigation (by ELI Schools):

- **Conducted when allegation does not meet child protection threshold**
- Investigates conduct/disciplinary concerns
- Gathers facts, interviews witnesses, reviews evidence
- Determines if person's conduct breaches policies or professional standards
- May result in disciplinary action

External Investigation (by Tusla and/or Gardaí):

- **Conducted when allegation meets child protection threshold**
- Statutory authorities investigate
- Criminal investigation (if potential criminal offense)
- Child welfare assessment (by Tusla)
- ELI Schools cooperates with external investigation

1. Investigation Team:

- **Internal Investigation Process (for Non-Child-Protection Allegations)**
- HR Manager leads investigation (or external investigator if impartial investigation needed)
- Investigation team includes Quality Officer, Senior Manager (not involved in allegation)
- Team has authority to gather information, interview witnesses, review documents

2. Investigation Plan:

- Clarify what is being investigated
- Identify witnesses to interview
- Identify documents or evidence to review
- Determine timeline for investigation
- Establish confidentiality and communication protocols

3. Interviews:

- **Alleged perpetrator:** Right to be informed of allegations, have representation, respond to allegations, present evidence
- **Complainant/Reporter:** Detailed account of what was observed/reported
- **Witnesses:** Anyone with relevant information
- **Child (if applicable):** Age-appropriate interview with care taken to avoid re-traumatization

4. Evidence Review:

- Any documentary evidence reviewed
- Emails, messages, records analysed
- Timelines established

5. Investigation Report:

- Findings documented
- Conclusions about whether allegations substantiated, not substantiated, or inconclusive
- Recommendations provided to management

6. Investigation Outcomes:

- Findings communicated to alleged perpetrator
- Right to respond to findings
- Determination of whether disciplinary action warranted

Cooperation with External Investigations

Full Cooperation:

- ELI Schools cooperates fully with statutory investigation
- Provides all information and evidence requested
- Makes premises and records available
- Facilitates interviews with staff, children, witnesses as needed
- Does not obstruct or interfere with investigation

Internal Investigation Suspended:

- ELI Schools typically suspends internal investigation pending external investigation outcome
- Rationale: Avoid duplication, ensure Gardaí not compromised by parallel investigation
- If external investigation concluded, ELI Schools may conduct separate investigation for disciplinary purposes

Disciplinary Action and Dismissal

Process

If Allegations

Substantiated:

Investigation determines conduct occurred and constitutes breach of Code of Conduct, misconduct, or gross misconduct.

Options for Action:

Warnings (Formal or Informal):

- Verbal warning (for minor infractions)
- Written warning (for more serious misconduct)
- Final written warning (for repeated misconduct or serious infractions)

Suspension or Stand-Down:

- Suspension from specific duties (e.g., no contact with children)
- Temporary removal from role pending retraining or reassessment

Mandatory Training or Support:

- Requirement to complete training (safeguarding refresher, boundary training, etc.)
- Requirement to participate in counseling or support

Dismissal:

- For gross misconduct (serious breach, assault, sexual abuse, serious safeguarding breach)
- For repeated misconduct despite warnings
- Summary dismissal (immediately, without notice) for gross misconduct
- Dismissal with notice (period specified in contract) for other reasons

Dismissal for Safeguarding-Related Misconduct

Grounds:

- Physical abuse of child
- Sexual abuse or inappropriate sexual conduct with child
- Serious breach of duty of care
- Serious boundary violations
- Failing to report safeguarding concerns
- Intimidating or threatening child or reporter
- Serious misconduct involving drugs, alcohol, or other harmful substances

Process:

- Fair disciplinary process followed (right to respond, representation, appeal)
- But child protection paramount (can proceed to dismissal if safeguarding risk)
- Dismissal letter issued explaining reasons
- Final pay processed
- References not provided (or neutral reference only)
- Consideration of prohibition from working with children

14.11 ELI Schools Code of Conduct for Working with Children and Young People

All staff and volunteers working with children must read, understand, and comply with this Code of Conduct.

- Principle:** • All interactions with children must prioritize their safety, welfare, and best interests. Staff and volunteers are role models and must conduct themselves professionally, ethically, and safely at all times.
- Children's Welfare Is Paramount**

Respect And Dignity DO:

- Treat all children with respect, dignity, and fairness
- Value diversity and respect cultural, religious, and individual differences
- Use appropriate, respectful language
- Listen to children and take their views seriously
- Encourage and praise children (positive reinforcement)
- Be patient, kind, supportive

DON'T:

- Use disrespectful, demeaning, or discriminatory language
- Shout, humiliate, belittle, or shame children
- Show favouritism or treat children unfairly
- Ignore, dismiss, or minimize children's concerns or feelings

Appropriate Boundaries and Relationships DO:

- Always maintain professional boundaries
- Keep relationships professional (teacher-student, staff-student relationship, not friendship or personal relationship)
- Be friendly but not friends (distinction important)
- Interactions in professional context (school, activities, educational/pastoral support)

DON'T:

- Develop personal or intimate relationships with children (romantic, sexual, or close personal friendship relationships inappropriate and prohibited)
- Share personal contact details (personal mobile number, personal social media accounts, personal email) with children or contact children through personal channels
- Meet children outside of school/programme context (one-to-one meetings in private, social meetings)
- Give gifts to individual children (unless small, token gifts in professional context - e.g., all students receive certificates, birthday card for class)
- Accept expensive gifts from children (small tokens acceptable - e.g., thank-you card, small souvenir from home country)
- Discuss personal problems or inappropriate topics with children (your relationships, financial issues, inappropriate content)

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Physical Contact DO:

- Minimize physical contact with children
- Physical contact only when necessary (e.g., first aid, preventing immediate danger, age-appropriate comforting if child distressed and initiates contact - e.g., very young child crying and seeks hug)
- Physical contact appropriate, brief, and in open view of others
- Respect child's personal space and body autonomy (don't touch without consent, respect if child uncomfortable with contact)

DON'T:

- Engage in unnecessary physical contact
- **Never engage in sexual or inappropriate physical contact** (zero tolerance)
- Rough play, physically aggressive play (tickling, wrestling, etc.)
- Physical punishment (hitting, slapping, smacking, pushing - illegal and prohibited)
- Physical contact in private or secluded areas
- Force physical contact if child uncomfortable

Examples:

- **Appropriate:** Shaking hands, high-five, pat on back (congratulations), comforting hand on shoulder (if child distressed and appropriate), first aid (treating injury), guiding child safely (holding hand to cross street with young child)
- **Inappropriate:** Hugging or cuddling beyond brief, child-initiated comfort (prolonged, frequent, initiated by adult), kissing, touching child's thighs/chest/buttocks/genital areas (except medical emergency and with witness), physically restraining child aggressively

One-To-One Interactions DO:

- Ensure transparency in all interactions
- One-to-one interactions (if necessary - e.g., pastoral conversation, academic feedback) in visible, open spaces (classroom with door open, office with window, public area)
- Inform colleague or DLP if one-to-one meeting necessary
- Keep meeting short and purposeful

DON'T:

- Be alone with child in private, secluded, or enclosed space (behind closed doors, in car, in accommodation alone, etc.)
- Take child to private location (your home, child's accommodation when no one else present, isolated location)
- Put yourself in compromising position (if you're alone with child and allegation arises, hard to defend)

If Unavoidable to be Alone with Child (Emergency):

- Inform colleague or DLP immediately
- Document (what, when, why, what was discussed/done)
- Minimize time alone
- Ensure visible if possible (e.g., if driving child to hospital in emergency, notify DLP, stay in public hospital waiting area with child)

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Communication And Language

DO:

- Use age-appropriate, respectful language
- Speak to children (not at them or over them)
- Positive, encouraging communication
- Clear, appropriate explanations

DON'T:

- Use inappropriate language (swearing, sexual language, discriminatory language, aggressive language)
- Make sexual comments or innuendos
- Make comments about child's body, appearance (in sexual or inappropriate way)
- Engage in or allow sexual conversations, jokes, or discussions (not appropriate in children's presence)
- Share inappropriate personal information
- Communicate with children in secret (e.g., secret messaging, asking child to keep conversations secret)

Online And Digital Interactions

DO:

- Use only ELI Schools official channels for communication with children (school email, official platforms if used for learning)
- Communication professional and transparent
- Communication documented (school email, systems)

DON'T:

- Connect with current junior students on personal social media (Facebook, Instagram, Snapchat, etc.) - Professional accounts or ELI Schools official accounts only
- Private messaging with children through personal accounts or platforms
- Share personal contact details with children
- Send or request personal photos or videos
- Engage in online relationships or inappropriate online communication with children

Note: After student completes programme and is adult (18+), and significant time has passed, may connect on social media if appropriate (former student, now adult, alumni relationship); but during programme and while student is child, no personal social media connection.

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Photography And Images

DO:

- Obtain consent before photographing or filming children (parental consent for under-18s; ELI Schools obtains consent as part of enrolment)
- Use school camera/device for photographs/videos (not personal phone unless no alternative and for school purposes)
- Store images securely
- Use images only for appropriate purposes (school website, brochures, social media - with consent, educational purposes)

DON'T:

- Photograph or film children inappropriately (changing, in private situations, posed inappropriately)
- Share images of children on personal social media
- Take images for personal use
- Share images with third parties without consent

Supervision

DO:

- Supervise children at all times (during classes, breaks, activities, excursions)
- Maintain supervision ratios (minimum 1 adult:15 children; higher ratio for younger children or higher-risk activities)
- Know where children are and ensure safety
- Conduct headcounts regularly during activities
- Brief children on safety, behaviour, expectations

DON'T:

- Leave children unsupervised
- Assume someone else is supervising (clear allocation of supervision responsibility)
- Allow children to wander off or leave group without permission and supervision

Alcohol, Drugs, Smoking

DO:

- Always be professional and sober when working with children
- Model healthy behaviour

DON'T:

- Consume alcohol or drugs while responsible for children (during programme hours, activities, residential supervision)
- Be under the influence of alcohol or drugs when working with children
- Provide alcohol or drugs to children (illegal; children under 18 cannot legally consume alcohol in Ireland)
- Smoke in presence of children (illegal in Ireland to smoke in car with child present; unprofessional and unhealthy to smoke around children)

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Health And Safety

DO:

- Ensure children's safety at all times
- Conduct risk assessments for activities
- Follow health and safety procedures
- Respond promptly to accidents or injuries (first aid, medical care, report to DLP and parents)
- Report hazards or safety concerns

DON'T:

- Put children at unnecessary risk
- Ignore safety procedures
- Fail to respond to injuries or health concerns

Confidentiality (With Limits)

DO:

- Respect children's privacy
- Keep information about children confidential (not discussing children's personal matters with other staff except on need-to-know basis, not gossiping)
- Explain to children that confidentiality has limits (if they disclose abuse, you must report)

DON'T:

- Promise absolute confidentiality (you cannot keep secret if safeguarding concern)
- Discuss children's personal information inappropriately (in public, with unauthorized people, in staff room gossip)
- Share safeguarding information except with DLP and authorized persons

Recognizing And Reporting Concerns

DO:

- Be vigilant and alert to signs of abuse or neglect
- Listen to children if they disclose concerns
- Report all concerns to DLP immediately (no matter how small)
- Follow reporting procedures

DON'T:

- Ignore concerns or assume someone else will report
- Investigate concerns yourself (report to DLP; statutory authorities investigate)
- Promise child you won't tell anyone (you must report safeguarding concerns)

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Managing Challenging Behaviour

DO:

- Use positive behaviour management strategies (clear expectations, positive reinforcement, consequences appropriate to behaviour)
- Remain calm and professional
- Use de-escalation techniques (calm voice, give child space, redirect)
- Seek support from colleagues or management if needed

DON'T:

- Use physical punishment (illegal and prohibited)
- Humiliate, shame, or verbally abuse child
- Physically restrain child except in emergency (if child or others in immediate danger; use minimum force necessary; report to DLP and parents immediately)
- Isolate child inappropriately (locking child in room, excluding for extended periods)

Gifts And Money

DON'T:

- Give money to children
- Lend money to children
- Do children's shopping or errands (except in official capacity - e.g., organized activity purchasing craft supplies)
- Benefit financially from relationship with child

Gifts:

- Small, token gifts appropriate in professional context acceptable (e.g., all students receive certificates at end of programme)
- Expensive, frequent, or personal gifts inappropriate

Transporting Children

DO:

- Transport children only when necessary and authorized (e.g., emergency, official excursion with appropriate permissions)
- Have another adult present if possible
- Inform management/DLP
- Ensure appropriate insurance and safety (seatbelts, appropriate vehicle)

DON'T:

- Transport children alone regularly
- Transport children for non-official purposes (personal favour, social outing)

Breaching this Code of Conduct is serious and may result in:

- Verbal or written warning
- Additional training or supervision
- Suspension (precautionary suspension pending investigation if serious allegation)
- Disciplinary action up to and including dismissal
- Referral to Gardaí (if criminal offense)
- Referral to statutory authorities (Tusla, teaching council if teacher)

Child safeguarding concerns or serious breaches of Code of Conduct will be investigated thoroughly and appropriate action taken to protect children.