SAFEGUARDING AND CHILD PROTECTION
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INTRODUCTION

Thank you for volunteering with the Irish Girl Guides (IGG). This booklet is one of our ways to help and support you in your role in IGG. Safeguarding and Child Protection is designed to ensure that Leaders and Unit Helpers get clear guidance on IGG procedures for matters relating to the protection of children and adults.

This booklet is drafted in accordance with the recommendations of:

- the Department of Health and Children's Children First Guidelines (September 1999)

These publications state that organisations that provide services to children, in conjunction with everyone else, have a duty and responsibility to protect children. They are State-promoted sets of guidelines which have been used and adopted as appropriate for the purposes of the Irish Girl Guides.

Attendance at an IGG safeguarding and child protection training is a requirement for obtaining a warrant to be recognised as a licensed Assistant Leader or Leader with IGG. For more information regarding our safeguarding and child protection trainings, Leaders can contact their Commissioner, Regional Development Officer (RDO) or National Office. It is recommended that Leaders keep their training on this topic up-to-date.

For further reference and support, it is advised that every Unit has a copy of the Code of Good Practice, Child Protection for the Youth Work Sector. If you do not have a copy please contact the Safeguarding Officer (SO) in National Office. Copies of the various IGG forms and booklets mentioned in this booklet are available from the Leaders' Area of the IGG website, your Commissioner or from National Office.

We value your time as a volunteer in the Irish Girl Guides and hope that this resource will give you all the help you need to comply with our good practices. Training and support are always readily available – just ask within your Region/Area/District. For the most up-to-date information, please see the website www.irishgirlguides.ie

WHY WE NEED SAFEGUARDING POLICIES AND GOOD PRACTICE

Safeguarding and Child Protection policies are drafted to emphasise that the welfare of our members is of paramount importance. As a voluntary organisation working with children we must:

- ensure that the children in our care are protected from harm of all kinds
- recognise that children and adults have rights as individuals and must treat each other with dignity and respect
- establish links with parents and/or guardians
- know how to respond to suspected child abuse
- have in place and use a method of recruiting and screening potential volunteers
- have in place a procedure for responding to accidents and complaints
- have in place a procedure for responding to alleged or suspected incidents of abuse
- have in place a procedure for suspension and withdrawal of Leaders where necessary
- have in place a procedure for suspension and if necessary, termination of a child’s membership
- have in place a procedure for the child protection training for Leaders
- have in place a procedure for the support of IGG members, Leaders and Unit Helpers
ABOUT THE IRISH GIRL GUIDES

The Irish Girl Guides is a uniquely girl-only, youth-driven, active and dynamic organisation. It offers a varied and exciting programme for girls and young women aged 5-30, and opportunities for Leaders of all ages. In an all-female organisation, the girls are free to progress and express themselves in a comfortable setting. They enjoy the activities as they can ‘just be girls’ without any pressures and learn to be themselves in a safe environment while learning the skills that will, one day, help them to be responsible citizens and adults.

We have a strong emphasis on the outdoors, environment, community responsibility and teamwork. The girls’ self-esteem and leadership skills are developed as they progress through Guiding. The Irish Girl Guides actively promotes diversity and inclusion and welcomes girls and young women from all walks of life. Anyone who lives their life as female is welcome to join the organisation.

The Irish Girl Guides has four different age brackets which we call Branches:

- Ladybirds is a 3 year programme for girls aged 5 to 7 years
- Brownies is a 3 year programme for girls aged 7 to 10 years
- Guides is a 4 year programme for girls aged 10 to 14 years
- Senior Branch programme is for girls and young women aged 14 to 30 years

And from the age of 18 onwards, women who share the ethos of IGG can undertake to become a Leader. Some Leaders work with a Unit on a weekly basis while others assist with the administration of IGG at local, regional or national level. Trefoil Guild is a group within IGG for women who cannot make a regular commitment but still wish to keep in touch with Guiding and share ideas or do activities. We also have Non Unit Volunteers who are Leaders and are not attached to a specific Unit, many of whom take on roles such as training or administration.

Units consist of approximately 20-30 girls and are run by a team of Leaders who have undertaken the relevant screening and training. They follow the appropriate ratio guidelines as set by IGG to ensure adequate supervision. A Unit Helper is someone who helps out occasionally i.e. “now and then”, “from time to time”, “irregularly”, “once in a while” when additional help is needed e.g. at Unit meetings, holidays or camps. This includes someone who is on a parents’ rota and includes both males and females.

IGG is over 100 years in existence in Ireland and as such has developed a supportive administrative structure. The General Council of IGG is responsible for the control and the general supervision of the organisation. The Executive Committee controls and manages the affairs of IGG and the National Programme and Training Committee is responsible for coordinating the development and delivery of all aspects of the Guiding programme and maintaining communication between various committees. There are seven administrative Regions of IGG spread across the entire country and each Region has a Regional Commissioner and a Regional team/committee. Within the Region, there are geographical groupings of Areas and Districts, each one having a Commissioner and a team to coordinate and support the Units and Leaders. Supporting the volunteers and girls, are the National Office staff and Regional Development Officers.

MISSION STATEMENT

The mission of the Irish Girl Guides is to enable girls and young women to develop to their fullest potential as responsible citizens of the world.
APPLICATION OF FAIR TREATMENT

Leaders/Unit Helpers about whom there are concerns must be treated fairly. They should be helped to understand the concerns expressed and the processes being operated, and be clearly informed of the outcome of any investigation and its implications for their future involvement with the Irish Girl Guides. The investigation should be completed as soon as possible.

The fact that legal action may not always be possible should not mean that action in relation to protecting children or disciplining the Leader/Unit Helper should not be taken. It is important that allegations are thoroughly assessed and a decision reached. Leaders/Unit Helpers should be told if a report is being made to Tusla - Child and Family Agency or An Garda Síochána.

CHILD

In Ireland, the Child Care Act 1991 defines a child as any person under the age of 18 years, excluding a person who is or who has been married.

The Domestic Violence Act 2018 bans child marriage (i.e. the court ordered exemption will no longer be available).

For the purpose of this booklet, and in line with the UN Convention on the Rights of the Child, a child refers to anyone who is under 18 years of age. In this booklet it refers to children and young people who are members of the Irish Girl Guides.

CONFIDENTIALITY

All information regarding concerns of possible child abuse should only be shared on a ‘need to know’ basis in the interests of the child. It should be ascertained before giving any information whether or not the person has any legitimate involvement or role in dealing with the issue. However, giving information to those who need that information, for the protection of a child whom you genuinely believe may have been abused, has been abused, or is at risk of abuse, is not a breach of confidentiality.

All written information including notes taken or copies of reports should be securely stored where they cannot be accessed or read by others. All written information should be destroyed once a report has been sent to the Safeguarding Officer (SO) or a Reporting Officer.

Any Reporting Officer who is submitting a report to Tusla - Child and Family Agency or An Garda Síochána should inform a parent/guardian, unless doing so is likely to endanger the child or place the child at further risk. A decision not to inform a parent/guardian should be clearly recorded together with the reasons for not doing so.

LEADER

For the purpose of this booklet a Leader is an adult, aged 18 or over, who is an unpaid voluntary worker in a leadership role in the Irish Girl Guides.
MANDATED PERSON

The Children First Act 2015, places a legal obligation on certain categories of professionals called “Mandated Persons” to report child protection concerns above a defined threshold to Tusla and to cooperate with Tusla in the assessment of mandated reports, where requested to do so.

Please note, if a member is a Mandated Person in another organisation or by virtue of their profession they are not an IGG Mandated Person. The Safeguarding Officer is the Mandated Person in IGG.

MEMBERS

A member is any girl or woman who is prepared to accept the Promise and Law.

REPORTING OFFICER

A Reporting Officer is the title given to the designated person appointed to investigate any child protection concerns reported by members of the Irish Girl Guides.

The Reporting Officer is also responsible for investigating any complaints or allegations against adult members, Unit Helpers or staff. The Reporting Officer is there to take an independent role in order to ensure that a thorough and fair investigation is carried out.

The SO holds a list of the Reporting Officers and is responsible for assigning one where necessary. A Reporting Officer has the option not to deal with a particular complaint e.g. if the person involved is well known to them and they are unable to be objective in their approach to the problem. In this situation the SO will ask another Reporting Officer to take on the case.

It is important that the identity of IGG’s Reporting Officers is kept confidential. Where a Reporting Officer has been assigned complete confidentiality in regards to their identity must be maintained at all times by all those involved.

ROLE OF THE REPORTING OFFICER

The Reporting Officer:

- is responsible for gathering information about any queries/concerns regarding children in the Units
- is responsible for gathering information regarding any complaints or allegations against adult members, Unit Helpers or staff
- investigates any concerns, complaints or allegations assigned to her and submits a written report of her conclusions and recommendations as a result of her investigation
- follows the procedures as set out in the relevant section of Safeguarding and Child Protection and IGG Constitution and Bye Laws as appropriate
- liaises between the Safeguarding Officer, members, staff and statutory authorities where necessary
- facilitates the provision of support to any victim, volunteer or employee making a referral and provides support also to the person against whom the allegation has been made
- assists with completing paperwork for reporting suspicions and allegations of child abuse to the statutory authorities i.e. Tusla - Child and Family Agency or An Garda Síochána

The Reporting Officers receive training before taking up their duties. The relevant training is coordinated by IGG. The Reporting Officers hold regular meetings and receive on-going training.

At all times the Reporting Officers follow the procedures laid down by the Irish Girl Guides Executive Committee and, when appropriate, liaise with and report to the Statutory Authorities for investigation.
SAFEGUARDING AD-HOC GROUP

The Safeguarding Ad-hoc Group is appointed by the Executive Committee to support the SO in her role of decision-making, particularly with regard to disclosures made as a result of the Garda Vetting process.

The Safeguarding Ad-hoc Group operates within a clear set of guidelines to provide consistency and to safeguard an individual’s rights. Disclosures of any kind will be dealt with on a case by case basis. All disclosures are held within the strictest of confidence.

SAFEGUARDING OFFICER (SO)

The Safeguarding Officer is IGG’s designated Liaison Person and Mandated Person appointed to deal with all Child/Vulnerable Person issues within the organisation. Their role is to support members, Leaders and Unit Helpers in respect of any aspect covered in Safeguarding and Child Protection.

The SO is responsible for administering the IGG screening process, including Garda Vetting and acting as the Liaison Person with the National Vetting Bureau on behalf of IGG.

S/he is also responsible for handling all concerns and/or complaints that may arise within the organisation and deals directly with members and non-members to help resolve the issues, from queries up to disclosures.

UNIT HELPER

A Unit Helper is an interested person who does not wish to, or cannot (e.g. a father) become a warranted Leader. This includes someone who is on a parents’ rota. They may be invited to attend Unit meetings, holidays or camps when additional help is needed. Unit Helpers are not Assistant Leaders and must not be left on their own or with other Unit Helpers to run the Unit.

VULNERABLE PERSON (ALSO REFERRED TO AS VULNERABLE ADULT)

“Vulnerable Person” means a person, other than a child, who –

(a) is suffering from a disorder of the mind, whether as a result of mental illness or dementia
(b) has an intellectual disability
(c) is suffering from a physical impairment, whether as a result of injury, illness or age, or
(d) has a physical disability

Definition: National Vetting Bureau (Children and Vulnerable Persons) Act 2012
POLICY STATEMENTS

Policies are clear, simple statements of how Irish Girl Guides intends to conduct its work to achieve its mission. IGG's policies reflect the values and culture of the organisation and provide a set of guiding principles to help with decision-making. The Irish Girl Guides have a number of policies and guidelines which are detailed on the website. Full copies of policies are also available from National Office. These policies and related statements provide a structure in which Guiding can take place safely. Policies must be followed by IGG members, staff and recognised volunteers involved in delivering or supporting Guiding. The relevant policies for this booklet are described below.

COMPLAINTS

Members of IGG and the public can raise a concern or complaint directly to IGG National Office by contacting the Safeguarding Officer, IGG National Office on 01-6683898 or emailing safeguarding@irishgirlguides.ie.

CHILD AND ADULT PROTECTION POLICY

The Irish Girl Guides values its members and has a programme aimed at the development of girls and young women in which all aspects of unsociable behaviour including bullying, harassment and abuse are unacceptable.

Our Leaders are trained to implement our programme in which the needs of the girl are a priority. All adult members, Unit Helpers and staff must understand, and agree to abide by, the Irish Girl Guides’ Safeguarding and Child Protection booklet.

If allegations or suspicion of abuse arise, our adult members, Unit Helpers and staff are advised to notify the SO who will assign a Reporting Officer immediately. The Reporting Officer will seek advice from Tusla and act within the guidelines laid down by the Department of Children and Youth Affairs.

If an adult member’s, Unit Helper’s or staff member’s behaviour or negative influence is considered by a Commissioner, or a Reporting Officer, to be causing concern, it is a requirement of the Irish Girl Guides that the person in question withdraws from the role, or is withdrawn immediately, pending an investigation.

CHILD SAFEGUARDING STATEMENT

Under the Children First Act 2015 organisations classed as providers of relevant services are required to produce and publish a Child Safeguarding Statement. This is a written statement that specifies the service being provided and the principles and procedures to be observed in order to ensure, as far as practicable, that a child availing of our service is safe from harm.

The Child Safeguarding Statement provides an overview of the measures that our organisation has in place to ensure that children are protected from harm. It also refers to more detailed policies which can be made available on request.

All Units should have a copy of this displayed at their meeting venue.

A copy of the Irish Girl Guides’ Child Safeguarding Statement can be found on the Irish Girl Guides website.

DATA PROTECTION POLICY

Under the Data Protection legislation, everyone has rights with regard to how their personal information is handled. In order to fulfil its mission, Irish Girl Guides may collect, store and process personal information about members, volunteers, staff, service providers and suppliers.
IGG, as the Data Controller with responsibility for the management of personal data by its members, recognises the need to treat this data in an appropriate and lawful way and is committed to doing so.

IGG has compiled a Data Protection Policy document to provide a concise policy statement regarding Data Protection. This includes obligations in dealing with personal data, in order to ensure that the organisation complies with the requirements of the relevant Irish and European legislation, namely the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011.

Irish Girl Guides also has a Data Destruction Policy, a Data Destruction Schedule and a Privacy Statement available.

**EQUALITY AND INCLUSION POLICY**

The Irish Girl Guides respects and values the diversity of its members and of society. As an organisation we believe in being fair, open and inclusive, while still being committed to the concept of a girl-only association for the development of girls and women in Ireland. As a faith-based organisation, the Irish Girl Guides is open to girls of every faith, and the religious beliefs of all are respected. Through Guiding girls are helped and encouraged to deepen their spiritual faith in accordance with the enrolment Promise.

The Irish Girl Guides is committed to promoting interculturalism throughout the organisation for youth members, volunteers, members of management committees and staff. IGG believes that valuing and managing diversity is about recognising and appreciating individual needs and differences and treating everyone with dignity and respect.

The Irish Girl Guides undertakes its responsibility to comply with equality legislation. As such it is committed to ensuring that no young person or adult is treated less favourably than another on grounds of: race, membership of the Traveller Community, sexual orientation, civil status, family status, disability, age. Anyone who lives their life as female is welcome to join and male adults are welcome in a supportive role as Unit Helpers.

The Irish Girl Guides is committed to prevent any form of discrimination, inequality or denial of equal opportunity, whether direct or indirect against youth members, volunteers, members of management committees and staff. IGG is committed to ensure that it fulfils its legal obligation under existing equality legislation.

The Irish Girl Guides seeks to actively demonstrate its celebration of diversity and its commitment to equality by placing these tenets central to all the policies, processes, procedures and programme of the organisation.

*Further information on human rights and equality legislation can be provided by the Irish Human Rights and Equality Commission.*

**MEMBERSHIP POLICY**

The Irish Girl Guides is a self-governing body. Membership is voluntary and open to all who live their lives as female and accept the Guide Promise and Law. The Association is independent from any political organisation or any political party.

**SUBSTANCE USE POLICY**

The substance use policy operates within the framework of IGG’s mission statement and supports the aims and objectives in providing a safe environment for its members, while enabling girls and young women to learn skills that will one day help them to be responsible citizens and adults.

IGG holds the Health Quality (HQ) Mark as a health-promoting youth organisation. IGG is committed to the development, health and well-being of all its members and incorporates health promotion in its programme.
which provides awareness on a number of areas including drugs.

In upholding IGG’s values all members should provide an example they would wish others to follow. IGG expects all its members to comply with the policy and, where necessary, will enforce the policy with disciplinary procedures as outlined in Safeguarding and Child Protection booklet.

- **Smoking** Anyone above the legal age for smoking must ensure that they smoke in a discreet, safe manner and in an appropriate legal place away from the girls and young women.

- **Alcohol** Adults at an event or residential experience involving girls and young women should exercise discretion regarding alcohol. They must abide by the legislation to do with the legal age for drinking alcohol, any guidelines set down prior to an event and the venue policy on the consumption of alcohol. In order to deal with an emergency or first aid incident, at least two adults must abstain from alcohol consumption, at least one of whom must be able to drive and have access to a car if possible. Adults must not be under the influence of or consume alcohol during any IGG Unit meeting. (For the purposes of this policy adults must comply with the legal alcohol limit as stated under the Irish road traffic legislation).

- **Drugs** It is illegal to take non-prescribed drugs not sold over the counter, at any age, and the Irish Girl Guides has an obligation to ensure that the law is upheld.

- **Solvents** IGG does not accept the misuse of solvent-based substances or inhalants by any of its members.
In order to prevent situations where children may be abused, or Leaders may be accused of abuse, the following sensible good practice of Do's and Don’ts should be followed:

**DO** make sure you are familiar with both the *Safeguarding and Child Protection* and the *Safety Guidelines* booklets (both of which are available free of charge to all Leaders and Unit Helpers).

**DO** be aware of your responsibility as a Leader, both towards the children and the other adult Leaders in your Unit, ensuring that all relationships/friendships are appropriate.

**DO** make sure that all activities have adequate supervision and boundaries.

**DO** take time to listen to the children in your care and respond to what they say, following up if necessary.

**DO** keep an Accident and Incident Log Book. This book must be kept as a record of all accidents where injury occurs and all incidents of bullying or disruptive behaviour. Please refer to the Recording Procedure as set out in this booklet.

**DO** follow the IGG Reporting Procedure if there is an incident or allegation of abuse.

**DO** provide an example you would wish others to follow.

**DO** ensure environment is safe.

**DO** keep Attendance Records. This can be done on OGM or in paper format in a roll book. This should include everyone who was present – Leaders, Unit Helpers, girls, Leaders' children and visitors.

**DON’T** allow rough horseplay or inappropriate physical contact.

**DON’T** do things of a personal nature that the children can do for themselves.

**DON’T** promise to keep secrets.

**DON’T** permit bullying – either physical or verbal.

**DON’T** ignore allegations a child makes – question, record and respond.

**DON’T** show favouritism.

**DON’T** be left alone with a child, away from others. Where this is not possible, leave a door open and inform another Leader that the child will be alone in the room with you, and tell her the purpose of your one to one meeting. If possible give an idea of the length of time you expect to be together.

**DON’T** take a child alone in a car, however short the journey.*

**DON’T** take individual children to your own home.*

* If this is unavoidable, the Leader must make contact with the child’s parents or guardians to advise them of the situation and to obtain their consent to a proposed course of action.

As a general principle, Leaders are advised not to make physical contact that may be misconstrued by a child or an adult. When administering First Aid Leaders should ensure that, wherever possible, other children or adults are present.

**DON’T BELIEVE THAT IT COULD NEVER HAPPEN TO YOU – DON’T RELY ON YOUR GOOD NAME TO PROTECT YOU.**
CONDUCT GUIDELINES

Conduct Guidelines for Girls (as noted on the Personal Registration Form)

- A reasonable standard of behaviour, including respect for Leaders and all other members, is expected at all times.
- Girls should not be left at the meeting venue without ensuring that Leaders are present. Girls should be collected immediately after the meeting ends, as the Leaders’ responsibility officially ends at the stated finishing time.
- Punctuality is expected and an excuse should be sent if the girl is unable to attend.
- Uniform should be worn for all meetings unless otherwise stated.
- Subscriptions to Unit and Annual Membership must be paid when due.

Conduct Guidelines for Leaders

When signing the Agreement Form for Leaders with the Irish Girl Guides, Leaders agree to:

- Accept the Guide Promise and Law as the foundation of Guiding and understand the aims and objectives of the Irish Girl Guides.
- Attend IGG's Safeguarding and Child Protection Training and to read and abide by IGG's Child and Adult Protection Policy.
- Undertake whatever Leader training is appropriate to their appointment.
- Return their warrant upon ceasing membership or upon being requested to do so by the Executive Committee.
- Be punctual for meetings.
- Wear uniform to meetings unless otherwise stated.
- Behave reasonably, including having respect for all other members, at all times.

Conduct Guidelines for Unit Helpers

When signing the Agreement Form for Unit Helpers with the Irish Girl Guides, Unit Helpers:

- Deem themselves suitable to work with children and agree to successfully complete the relevant screening process.
- Agree to read and abide by IGG's Child and Adult Protection Policy.
- Agree with the aims and objectives of the Irish Girl Guides.
- Accept the Guide Promise and Law as the foundation of Guiding.

Conduct Guidelines for Trefoil Guild Members

When signing the Agreement Form for Irish Trefoil Guild members, they:

- Agree with the aims and objectives of the Irish Girl Guides.
- Accept the Guide Promise and Law as the foundation of Guiding.
- Agree to read and abide by IGG's Child and Adult Protection Policy.
- Agree to successfully complete the relevant screening process before attending an IGG residential event at which under 18 year olds are in attendance.

Details of the Guide Promise and Law can be found in the Leading the Way publication or online.
IGG SOCIAL MEDIA PROCEDURES

Social media is an essential tool for increasing public relations and communication in the modern world. The ability to share information instantly with a large number of people is a system that is invaluable. As a charity, we want to use social networking platforms to the best of our ability but, as an organisation for girls and young women, it is always important to keep the safety and protection of our members as an upmost priority.

These procedures work in tandem with the Guidelines on the Use of Images of IGG Members and are intended to help Leaders make the most of technology while protecting both the young people in their care and preventing themselves from being placed in a vulnerable position. Leaders are encouraged to share the procedures with girls in their Units to ensure that they are aware of the risks involved in using social media and know how to stay safe.

These procedures are relevant to all social media platforms, including Facebook, Twitter, Instagram, Snapchat, YouTube, LinkedIn, Pinterest and Google+.

**General Guidelines on use of Social Media**

- Never reveal personal details, home address or telephone numbers on the web or in dialogue with other internet users.
- Make sure to protect your personal details as the default settings are often set to disclose all information to others in your network. It is safer to limit access to people you know personally or who belong to any closed groups you join. In general, set all your privacy settings to “only my friends” or “no-one”. Check back occasionally to make sure nothing has changed.
- Remember if using social media with our youth members, the digital age of consent for use of any social media channels in Ireland is 16 years of age. Children under 16 should have parental consent to use these platforms. Therefore, don’t rely on any social media channel as your main form of contact with members.
- Remind girls that new friends they meet online are really strangers. Suggest that they only accept people as ‘friends’ who they know already and have met in person. Ensure they are familiar with Irish Girl Guides Internet Guidelines for Girls.
- It is recommended that if a Leader knows a person under 18 years only through membership of IGG, they should not be ‘friends’ or allow them to follow them on social networking sites. You can still join the same closed groups without being friends and therefore can moderate a Unit page for your girls. However, if you are friends with the person under 18 years outside of Guiding, the situation is different.

**Procedures for Units/Regions setting up Social Media Accounts**

Using social media as a Unit or Region is very different to personal usage. Ultimately, the aim is to use social media to help IGG deliver its mission – to ‘enable girls and young women to develop to their fullest potential as responsible citizens of the world’. It is an opportunity for us to let the public know that girls gain confidence through their involvement in Guiding and that they gain teamwork, leadership and other essential life-skills. Activity on social media must always reflect the dignity and privacy of girls and volunteers.

1. We would strongly advise that Units/Regions are clear on the purpose of their social media pages:
   (a) If you decide to set up a public Facebook page, only use this to raise awareness of the organisation, recruit new members and for publicity by showing the benefits of being involved in IGG, both as Leaders and girls. Don’t use it to post exact details of when and where you’re meeting; to exchange information; give girls’ names; or organise activities. Precise details of future events (e.g. Ballytown Brownies will meet at 6pm in the local woods) should never be advertised on a public page. If using images on a public page, simply say “Girls from Ballytown Brownies completing their ABC badge recently” rather than “Mary (8) and Ciara (9) doing their badgework on Tuesday evening in Ballytown Parish Hall”. 
(b) Set up ‘closed’ groups for girls/Leaders/parents to communicate about activities. When setting up your group, make sure that you adjust your privacy settings to moderate who can become a member of your group and only invite/accept people you know. Your group should be closed so that no-one can see who belongs to it unless they are a member. Have a minimum of two administrators whose job it is to moderate interactions and flag any concerns.

2. Ensure that girls are aware of the status of any groups they join. Some groups are ‘open’ to anyone who chooses to sign up. The Irish Girl Guides cannot guarantee that all members of an open Guiding group will be genuine members of IGG.

3. You may wish to have two pages – one for the public face of your Unit/Region and one for internal logistics/conversations with girls/parents/Leaders. Or, alternatively, use a group messaging service such as Messenger, WhatsApp or Viber. Please see the Guidelines on the Use of Group Messaging for advice if this is the option you choose.

4. Be careful sharing photos or videos of girls. Please follow the Guidelines on the Use of Images of IGG Members and never tag anyone under 18 years. Before posting a photo, ask yourself, “Would I be comfortable with this photo being posted if it was of my child?” Remember: once a photo is online, it can be accessed in years to come and, as an adult, the girl may not want that photo of her to be in the public domain.

5. At events, inform parents never to share photos of other people’s children online without permission.

6. Always monitor comments and respond to questions. Delete any inappropriate comments on a Facebook page and ban the perpetrators from the page. To do this, click on the arrow to the right of the comment and select ‘hide comment’; you will then be given the option to ‘ban’ the person. It is not possible to delete someone else’s tweet but you can report a tweet as offensive and Twitter will review it and, hopefully, remove it. You can do this by clicking the ‘more’ option, selecting ‘report’ and then the ‘abusive or harmful’ option. It may take a day or two before it is removed.

7. When sharing external links, be sure to follow the link before sharing, read the whole story and check the site to ensure it is appropriate. The content of potential links should be in keeping with IGG’s principles and activities. Avoid linking to commercial sites selling merchandise to avoid implied IGG endorsement of the products they offer. Seek out sites that enhance girls’ participation in Guiding, are tasteful, appropriate, show diversity, are beneficial for girls, adults and families, and are in keeping with IGG’s mission.

8. Be careful when sharing causes. Never share political views, opinions on sensitive topics or any other inappropriate content.

If you have any child protection concerns regarding the online presence of IGG please report your concerns to the Irish Girl Guides Safeguarding Officer on 01-6683898 or email safeguarding@irishgirlguides.ie

Please note that IGG is not responsible for any social media other than the IGG national social media accounts. While IGG nationally cannot control the accounts of individual members, Units and Regions, members using Unit/Regional accounts are asked to adhere to the above procedures.
GUIDELINES ON THE USE OF IMAGES OF IGG MEMBERS

The taking and use of photographs or film at an IGG-related activity is an indispensable tool in the promotion of the organisation. Leaders are encouraged to actively take part in the promotion of IGG at a local and national level. As with all activities and events which take place within an IGG context, safety and protection of our members is paramount. The following guidelines have been designed to protect the personal information of our members (as required under Data Protection legislation) to safeguard against the inappropriate use, reproduction or adaptation of photographs or film of those members and to respect their dignity.

1. The Personal Registration Form for girls contains a section advising parents that their child’s image may be used. Leaders should ensure that they hold up-to-date Personal Registration Forms for each girl, signed by their parent or guardian. New Personal Registration Forms should be filled out each year and the old ones destroyed. These forms should be kept in a safe and secure place, and information uploaded to OGM.

2. Leaders should ensure that any photograph or film used shows the girls in official, presentable uniform, or where not feasible, appropriate dress for the activity in which they are taking part e.g. camp. Under no circumstances should girls be photographed or filmed in swimwear or nightwear or in compromising positions e.g. some yoga positions or other activities may be unsuitable. Be aware that photos can be copied, cropped and used for different purposes online. Similarly Leaders should ensure that the behaviour depicted in the photographs or film is appropriate behaviour, having regard to the age of the girls involved and the image and values which IGG seeks to promote.

3. Photographs or film of IGG members should be used appropriately. For example in Guiding-related publications and social media, newspapers, local newsletters etc., images should be used in a way that promotes a positive image of IGG. Leaders should encourage this principle with girls in their Unit who may take their own photographs or film at Guiding events. Leaders should remind girls

GUIDELINES ON THE USE OF GROUP MESSAGING

If setting up a WhatsApp or similar group, you must first get everyone’s permission to use their number in the group. You can do this as part of your Registration night at the start of the year or you can message each parent individually and ask them the following:

Unit X are setting up a Parents’ WhatsApp/Messenger/Viber group to enable the Leaders to communicate with you about the Unit and its activities. If you are happy to be included in the group, please reply indicating you want to be part of the group. Please note your number will be visible to other members of the group. If you wish to be removed from the group at any point, please let us know.

Then take a screenshot of each person’s consent as this is your record of their permission to be in the group.

Once the group is set up please include an explanation of the purpose of the group as a reminder to all of the reason for the group. Insert the following wording in the Group Description:

This group is solely for communication from and to the Leaders of X Unit. Parents are asked not to send other information via this group. Irish Girl Guides are not responsible for any information shared by parents in this group. If you are asked to remove a message by one of the Leaders, you must do so immediately. If you wish to be removed at any point, you can remove yourself or contact the Unit Leader.

If a parent posts something inappropriate in the group, the Leader must contact the parent and ask for it to be removed immediately. If the parent does not do this, you should go to settings and ‘export chat’ to keep a record and then close the group. To close a group you must remove each participant, exit the group and you will then be given an option to delete the group.

A new group needs to be set up each September for the girls in your Unit for that year specifically.
not to take photos of others without their permission and not to share the photos online without permission to do so.

4. Girls should not be permitted to take part in unsupervised or one-to-one photographing or filming sessions with either Leaders or external/professional photographers or videographers. Leaders should bear in mind IGG’s Safeguarding and Child Protection in this regard.

5. The Data Protection legislation outlines laws regarding the use of an individual’s personal information. For this reason, IGG members under 18 should never be named in full or tagged on social media. In certain cases, such as enrolments or award ceremonies or where photos of a small group of members are sent to newspapers, National Office staff will work on the understanding that consent has been obtained for members to be identified by name as per the Personal Registration Form.

6. It is the responsibility of Leaders sending photographs or films of Unit activities to National Office for use at national level to ensure that they hold an up-to-date signed version of the Personal Registration Form for every girl in the photographs or films in question.

7. When attending any event organised by or involving members of IGG, Leaders should ensure that they inform the event organiser in advance if any girl attending that event does not have parental consent for the use of their image. Leaders should announce at the beginning of the event to all present e.g. parents, that they may not take or share photos of the whole group or of other people’s children without their permission.

8. Leaders should keep in mind that girls who do not have parental consent may feel excluded if they are being left out of photographs and film. Leaders should remain sensitive to the girls’ feelings in this situation and attempt to minimise any feelings of exclusion.

9. Leaders should also remember to give due consideration to the appropriate use of photographs or film of fellow Leaders or adult members. If Leaders are in doubt as to whether they would be happy for them to use a photograph or film of them in any context, they should just ask.

10. If a Leader or parent has any concerns regarding the inappropriate use of photographs or film of an IGG member, they should report those concerns to the Safeguarding Officer in National Office.

**RECORDING PROCEDURES**

It is important that a record is kept of all accidents and incidents that occur during an event involving IGG members held at local, regional, national or international level. These should be documented in the Accident and Incident Log Book, which should be held by all IGG Units.

Basic information to be recorded in the Log Book:

1. Describe the events leading up to the accident/incident.
2. Describe in detail what the person was doing.
3. What happened and why did it happen?
4. Who was supervising?
5. Was the correct level of supervision and ratios in operation?
6. If an injury occurred during a game, was the injury foreseeable e.g. prolonged rough play?
7. Who witnessed the accident/incident?
8. Obtain detailed signed statements.
9. Place of accident/incident, together with photographs or sketches.
10. Most important – name, address and age of the injured party, nature of injury etc.

As well as being recorded in the Accident and Incident Log Book, some incidents may require that the Accident Report Form, Incident Report Form or Complaint Form is completed and sent to the Insurance Broker and Safeguarding Officer in National Office, as appropriate. These forms are in the Appendices and can also be downloaded from the IGG website.
ACCIDENT REPORT FORM (APPENDIX 1)

For an accident resulting in an injury, the Accident Report Form should be used.

INCIDENT REPORT FORM (APPENDIX 2)

This form should be used for the reporting of an incident other than an accident e.g. bullying, damage to property, petty theft.

COMPLAINT FORM (APPENDIX 3)

This should be used in the event of a complaint.
REGISTERING WITH IGG AND ATTENDING TRAINING

PERSONAL REGISTRATION FORM AND OGM

IGG's Personal Registration Form and Information Sheet for Parents must be given to all girls when they join a Unit and should be completed on an annual basis. This form must be signed by the parent/guardian and the girl (Guide and Senior Branch age only) and is returned to the Leader. The Information Sheet is retained by the parents/girl.

Once the signed form is received, a Leader should input the information on IGG's Unit management system – Online Guide Manager (OGM).

Although the form is not required for adults, it is important to capture the information on it for all adults in your Unit e.g. next of kin contact details. This should also be put on OGM so that it is accessible should the need arise.

SCREENING OF NEW ADULT LEADERS

The prospective Leader will be provided with a Leader Pack containing all the forms and booklets appropriate to the IGG screening procedure for Leaders. These Packs are available, free of charge, from National Office, all IGG Distribution Centres, Regional Development Officers (RDOs) and Commissioners. The Commissioner/RDO will then explain the steps of this confidential process. The process then proceeds as follows:

- The prospective Leader completes the following forms found in the Leader Pack:
  - IGG Leader Application Form
  - IGG Leader Agreement Form
  - ID Validation Form
  - Vetting Invitation Form

- The prospective Leader must arrange to meet with their Commissioner or RDO in person in order to have their identification verified and their ID Validation Form signed confirming their identity. (Information on the steps to follow and list of identification documents required can be found in the Leader Pack).

- Having read and agreed to abide by IGG's conduct guidelines, the prospective Leader signs the Agreement Form for Leaders with the Irish Girl Guides which the Commissioner/RDO countersigns to give her approval.

- All completed forms should be returned to IGG's liaison person: the Safeguarding Officer (SO), IGG National Office, 27 Pembroke Park, Dublin 4.

  N.B. Please note all completed screening forms should be returned together to National Office, as the ‘Acceptance on provisional basis letter’ cannot be issued until all completed forms are received by the SO.

- On receipt of completed ID Validation Form, supporting identification documents as required and the Vetting Invitation Form, an invitation to the eVetting website will be sent to the prospective Leader's email address. Using the link supplied, they can access the National Vetting Bureau Online Vetting system to complete a Vetting Application Form.

- Once the prospective Leader completes the online Vetting Application Form, this is automatically passed to the Liaison Person in IGG to review for completeness before forwarding to the National Vetting Bureau for processing.

- IGG will issue a letter by email to the prospective Leader once all her screening forms are received and her online Vetting Application Form has been completed, informing her that she has been accepted on a provisional basis, subject to successful completion of the screening process including Garda Vetting, strictly under the supervision of a warranted IGG Leader.

- A copy of this letter will also be forwarded by email to the Unit Contact Person (UCP) as proof that all forms have been received and the prospective Leader’s screening process is...)
underway. The UCP must ensure that this letter is received from the SO within three weeks of giving the Leader Pack to the prospective Leader. If this letter is not received she must follow up on the outstanding forms immediately.

- The SO contacts the two referees who have been listed on the Leader Application Form to seek their approval of the application.
- When the prospective Leader successfully completes the full screening process including Garda Vetting, IGG will issue a letter by email informing her that she has been registered as a Leader. Confirmation is also sent by email to her UCP, District Commissioner and RDO.

Please note prospective Leaders cannot attend a residential event until they have successfully completed the full screening process including Garda Vetting.

SCREENING OF NEW UNIT HELPERS

A Unit Helper helps out occasionally i.e. “now and then”, “from time to time”, “irregularly”, “once in a while” when additional help is needed e.g. at Unit meetings, holidays or camps. This includes someone who is on a parents’ rota and includes both males and females.

All Unit Helpers need to submit a signed Agreement Form for Unit Helpers. This form is available online or from National Office. Unit Helpers do not require vetting unless attending a residential event. The exception to this is an assistant for a member with special needs who helps on a regular basis, but is still regarded as a Unit Helper. In this situation Garda Vetting is required.

Screening Process for all Unit Helpers

The Leader will provide the prospective Unit Helper with an Agreement Form for Unit Helpers. These are available online or from National Office.

The Leader will then explain the steps to the confidential process and proceed as follows:

- The prospective Unit Helper meets with their Unit’s Leader in person to complete the Agreement Form for Unit Helpers.
- The Leader goes through the Safeguarding and Child Protection booklet with the prospective Unit Helper and explains IGG’s Child and Adult Protection Policy.
- The prospective Unit Helper signs the Agreement Form for Unit Helpers with the Irish Girl Guides which the Leader countersigns to give her approval.
- The completed form should be returned to the Safeguarding Officer, IGG National Office, 27 Pembroke Park, Dublin 4.
- IGG will issue a letter by email informing the Unit Helper that she/he has been registered as a Unit Helper. Confirmation is also sent by email to their Leader.

Additional Screening Process for Unit Helpers Attending Residential Events

Unit Helpers attending residential events must complete the full Unit Helper screening process, including Garda Vetting. The Leader will provide the Unit Helper with a Unit Helper Residential Pack containing all the appropriate forms. These Packs are available, free of charge, from National Office.

The Leader will then explain the steps to the confidential process and proceed as follows:

- The Unit Helper completes the following forms:
  - ID Validation Form
  - Vetting Invitation Form
- The Unit Helper must arrange to meet with their Unit’s Leader in person in order to have their identification verified and their ID Validation Form signed confirming their identity. Information on the steps to follow and list of identification documents required can be found in the Unit Helper Residential Pack.
- All completed forms should be returned to IGG’s Liaison Person: the Safeguarding Officer,
On receipt of completed **ID Validation Form**, supporting identification documents as required and the **Vetting Invitation Form**, an invitation to the eVetting website will be sent to the Unit Helper’s email address. Using the link supplied, they can access the National Vetting Bureau Online Vetting system to complete a Vetting Application Form.

Once the Unit Helper completes the online Vetting Application Form, this is automatically passed to the Liaison Person in IGG to review for completeness before forwarding to the National Vetting Bureau for processing.

When the Unit Helper successfully completes the full screening process including Garda Vetting, IGG will issue a letter by email informing them of that and confirmation is also sent by email to their Leader.

Please note Unit Helpers cannot attend a residential until they have successfully completed the full screening process i.e. **Agreement Form for Unit Helpers** submitted and Garda Vetting completed.

### Screening of New Trefoil Guild Members

The Irish Trefoil Guild caters for past and present adult members of the Guiding movement. It provides friendship, activities and enjoyment for its members, and gives service and support for the local community and Irish Girl Guide Units. The Irish Trefoil Guild National Council (ITGNC) is the body through which members are affiliated to IGG.

All Trefoil Guild members need to submit a signed **Agreement Form for Irish Trefoil Guild members**. This form is available online or from National Office. Trefoil Guild members do not require vetting unless attending a residential event.

#### Screening Process for all Trefoil Guild Members

- The prospective member meets with their Guild Chair in person to complete the **Agreement Form for Irish Trefoil Guild members**.
- The Chair goes through the **Safeguarding and Child Protection** booklet with the prospective member and explains IGG’s Child and Adult Protection Policy.
- The prospective member signs the **Agreement Form for Irish Trefoil Guild members** with the Irish Girl Guides, which the Chair countersigns to give her approval.
- The completed form should be returned to the Safeguarding Officer, IGG National Office, 27 Pembroke Park, Dublin 4.
- IGG will issue a letter by email informing the Trefoil Guild member that she/he has been registered as a member. Confirmation is also sent by email to the Guild Chair and the Chair of ITGNC.

If the person is not part of a Guild and is a Lone Member, the Chair of the Irish Trefoil Guild National Council (ITGNC) can countersign the form.

#### Additional Screening Process for Trefoil Guild Members Attending Residential Events

Trefoil Guild members attending residential events must complete the full Trefoil Guild screening process, including Garda Vetting. The Leader of the Unit they are going to attend an event with will provide the Trefoil Guild member with a Trefoil Guild Residential Pack containing all the appropriate forms. These Packs are available, free of charge, from National Office.

The Leader will then explain the steps to the confidential process and proceed as follows:

- The Trefoil Guild member completes the following forms:
  - **ID Validation Form**
  - **Vetting Invitation Form**
• The Trefoil Guild member must arrange to meet with their Unit’s Leader in person in order to have their identification verified and their ID Validation Form signed confirming their identity. Information on the steps to follow and list of identification documents required can be found in the Trefoil Guild Residential Pack.
• All completed forms should be returned to IGG’s Liaison Person: the Safeguarding Officer, IGG National Office, 27 Pembroke Park, Dublin 4.
• On receipt of completed ID Validation Form, supporting identification documents as required and the Vetting Invitation Form, an invitation to the eVetting website will be sent to the Trefoil Guild member’s email address. Using the link supplied, they can access the National Vetting Bureau Online Vetting system to complete a Vetting Application Form.
• Once the Trefoil Guild member completes the online Vetting Application Form, this is automatically passed to the Liaison Person in IGG to review for completeness before forwarding to the National Vetting Bureau for processing.
• When the Trefoil Guild member successfully completes the full screening process, including Garda Vetting, IGG will issue a letter by email informing them of that and confirmation is also sent by email to their Leader.

Please note Trefoil Guild members cannot attend a residential until they have successfully completed the full screening process i.e. Agreement Form for Irish Trefoil Guild members submitted and Garda Vetting completed.

SCREENING OF SENIOR BRANCH TURNING 18

The Unit Leader will provide the Senior Branch member with a Purple Senior Branch Pack containing all the forms and booklets required. (Please note this is not the same pack as given to new Adult Leaders joining IGG). These packs are available free of charge National Office, IGG Distribution Centres; Regional Development Officers and Commissioners.

The Unit Leader will then explain the steps to the confidential process and the process then proceeds as follows:
• The Senior Branch Member completes the following forms found in the Purple Senior Branch Pack:
  • IGG Purple Leader Application Form
  • ID Validation Form
  • Vetting Invitation Form
  • Garda Vetting Parent/Guardian Consent Form
• The Senior Branch Member must arrange to meet with their Unit Leader in person in order to have their identification verified and their ID Validation Form signed confirming their identity. (Information on the steps to follow and list of identification documents required can be found in the Purple Senior Branch Pack).
• All completed forms should be returned together to IGG’s liaison person: the Safeguarding Officer, IGG National Office, 27 Pembroke Park, Dublin 4.
• On receipt of completed ID Validation Form, supporting identification documents as required and the Vetting Invitation Form, an invitation to the eVetting website will be sent to the email address provided by the Senior Branch Member. Using the link supplied, they can access the National Vetting Bureau Online Vetting system to complete a Vetting Application Form.
• IGG will issue a letter by email to the Senior Branch Member informing her that her screening process is underway once all the forms in the Purple Senior Branch Pack have been received by National Office and her online Vetting Application Form has been completed.
• A copy of this letter will also be forwarded by email to the Unit Leader as proof that all forms have been received and the Senior Branch member’s screening process is underway. The Senior Branch member cannot help with the Unit once she turns 18 years of age if this letter has not been received. This is the Unit Leader’s responsibility to manage.
• The Safeguarding Officer will issue an Endorsement request letter to the Unit Leader whose name is provided on the Leader Application Form to endorse the application.
• An Agreement Form for Senior Branch becoming Leaders with IGG which is also required as part of the screening process will be held by National Office and sent to the Unit Leader when the Senior Branch
member is approaching her 18th birthday. This form will be presented to the Senior Branch member by the Unit Leader when she turns 18 years of age. Having read and agreed to abide by IGG’s Conduct Guidelines, the Senior Branch member signs this form. The Unit Leader will also sign this form before returning it to the Safeguarding Officer, IGG National Office.

- When the Senior Branch Member successfully completes the full screening process including Garda Vetting, IGG will issue a letter by email informing her that she has been registered as a Leader. Confirmation is also sent by email to her Unit Leader, District Commissioner and Regional Development Officer.

Senior Branch members changing to adult Leaders must ensure they submit all screening forms found in the Purple Senior Branch Pack prior to their 18th birthday in order to continue assisting with a Unit when they reach 18 years of age. Please note Senior Branch Members are allowed submit their screening forms to IGG for processing from 17 years of age.

Please note Senior Branch members 18 years and over must successfully complete Garda Vetting before being allowed attend a residential event at which under 18s are in attendance. This includes Senior Branch residential events. Senior Branch members assisting in a leadership capacity at an event must successfully complete the full Leader screening process including Garda Vetting before being allowed to attend.
# SUMMARY OF IGG SCREENING PROCESS

## Screening Process

Please see below summary of the screening process required for each role.

<table>
<thead>
<tr>
<th>Screening Process</th>
<th>Adult Leader</th>
<th>Unit Helper/ Trefoil Guild (attending residential events)</th>
<th>Senior Branch member becoming an adult Leader</th>
</tr>
</thead>
<tbody>
<tr>
<td>Be provided with relevant Pack</td>
<td></td>
<td></td>
<td>From 17 years</td>
</tr>
<tr>
<td>Meet with Commissioner or RDO to validate ID &amp; sign forms</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Meet with Unit Leader to validate ID &amp; sign forms</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Complete / return all forms to SO – Email sent with link to complete online Vetting form</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Provisional basis letter issued on receipt of all paperwork &amp; completion of online Vetting form</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Confirmation of screening process completed sent to;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>New Leader, Unit Leader, Commissioner &amp; RDO</td>
<td>Unit Helper/Trefoil Guild &amp; Unit Leader</td>
<td>SB member &amp; Unit Leader Commissioner &amp; RDO</td>
<td></td>
</tr>
</tbody>
</table>

## Screening Process Paperwork

Please see below summary of screening paperwork required for each role.

<table>
<thead>
<tr>
<th></th>
<th>Adult Leader</th>
<th>Unit Helper/ Trefoil Guild</th>
<th>Senior Branch member becoming adult Leader</th>
<th>Senior Branch member turning 18 yrs not becoming a Leader</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application Form</td>
<td>✓</td>
<td>Including Referee details</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agreement Form</td>
<td>✓</td>
<td>✓ (downloadable IGG Website)</td>
<td>Signed when 18</td>
<td></td>
</tr>
<tr>
<td>ID Validation Form, copies ID Docs &amp; Vetting Invitation Form</td>
<td>✓</td>
<td>✓</td>
<td>For residential events only</td>
<td></td>
</tr>
<tr>
<td>CV Parent / Guardian Consent Form</td>
<td>✓</td>
<td>For all members under 18 years</td>
<td></td>
<td>For all members under 18 years</td>
</tr>
</tbody>
</table>

All paperwork should be returned to the Safeguarding Officer, IGG National Office by the applicant.
WHAT HAPPENS IF A NEGATIVE DISCLOSURE IS RECEIVED?

If any disclosure raises doubts about the applicant’s suitability, it will be considered by the Safeguarding Ad-hoc Group. They will be provided with all available details about the relevant applicant and the disclosure; however the applicant’s identity will not be disclosed.

The applicant will be informed that the Group is to be convened. This does not mean automatic rejection – only that the Group is trying to achieve the best outcome for all concerned.

At all stages confidentiality will be adhered to.

The decision on making or rejecting an appointment following a negative disclosure will be made by the Group taking into account the nature of the disclosure and the history surrounding it. The Group will decide if the appointment may be made with or without restrictions.

More details on the screening process can be found in *Irish Girl Guides Garda Vetting Policy and Procedures* which is available on request from the Safeguarding Officer.

IGG SAFEGUARDING AND CHILD PROTECTION TRAINING

All Leaders are obliged to attend the IGG Safeguarding and Child Protection Training course as part of their Assistant Leader warrant training. Such training should be updated and renewed as required by the Executive Committee of the Irish Girl Guides. Please contact your Commissioner or RDO to arrange to attend the next training in your locality. An online training is available for Senior Branch members under 18 acting in a leadership capacity.

IGG will provide refresher training for members.

More details on this can be found in the section on Reporting Procedures in respect of Suspected or Actual Child Abuse in the *Code of Good Practice, Child Protection for the Youth Work Sector*. 
COMPLAINTS PROCEDURE

WHAT TO DO IF A COMPLAINT IS MADE AGAINST A LEADER

If a complaint is made against a Leader or when a Leader’s behaviour within a Unit or in any other aspect of Guiding, causes concern or is seen to be a negative influence, then, in order to protect the organisation and the Guiding ethos, the following steps should be taken:

1. Where appropriate another Leader should talk privately to the Leader in question and, giving reasons make her aware that her behaviour is not acceptable.
2. In the event of this informal procedure being unsuccessful, the District/Area Commissioner should be contacted to deal with the matter on an informal basis.
3. If the situation does not improve or is not resolved following this, or if the matter is considered to be so serious that formal procedures should be immediately invoked the Safeguarding Officer should be contacted. The SO will offer support and where necessary will contact a Reporting Officer (as per the reporting procedure).
4. The Complaint/Incident Report Form must be completed. The Reporting Officer will contact the Leader and inform her that she [the Reporting Officer] must take the necessary measures, which should be proportionate to the level of risk, and should not unreasonably penalise the Leader unless this action is necessary to protect children. If the Leader’s behaviour or negative influence is considered by the Reporting Officer or the Commissioner to be causing concern, the Leader in question will withdraw or be withdrawn, pending the investigation.
5. The Reporting Officer will gather appropriate information regarding the complaint with a view to resolving the matter and keep the SO and Commissioner informed. A copy of the Complaint/Incident Report Form should be made available to the Leader in question who should be offered an opportunity to respond to the complaint. Any further information, such as witness statements, will also be furnished to the Leader against whom the allegation has been made, in order that she can respond to the allegations.
6. Please note IGG will not accept complaints which are deemed to be malicious or of a frivolous or vexatious nature. If at any time during the investigation it becomes clear that the complaint is frivolous, vexatious or malicious the Reporting Officer can determine that there is no case to answer and close the case.
7. On completion of the investigation, the Reporting Officer will submit a written report of her findings to the SO who will inform those concerned of the outcome in writing and furnish them with a copy of the report.
8. If the Reporting Officer determines that the Leader has breached IGG’s standards, policies and/or procedures formal disciplinary procedures will be invoked.

Please note in the interests of fairness and transparency, anonymous complaints will not be accepted by IGG. Leaders can contact the Safeguarding Officer for advice/support at any stage of proceedings. At all stages confidentiality will be adhered to.

CONFIDENTIALITY IS IMPORTANT

It is important that the Leader is aware that she is entitled to have someone with her for moral support at all times.

The same process is followed for a Leader, member of Senior Branch over 18 or a Trefoil Guild member.
WHAT TO DO IF A COMPLAINT IS MADE AGAINST A UNIT HELPER

If a complaint is made against a Unit Helper, or when a Unit Helper’s behaviour within a Unit or in any other aspect of Guiding, causes concern or is seen to be a negative influence, then, in order to protect the Unit and the Guiding ethos, the following steps should be taken:

1. The Unit Leader should talk privately to the Unit Helper in question and, giving reason make her aware that her behaviour is not acceptable.
2. In the event of this informal procedure being unsuccessful, the District/Area Commissioner should be contacted to deal with the matter on an informal basis.
3. If the matter is considered to be so serious that formal procedures should be invoked the Safeguarding Officer should be contacted.
4. The SO will offer support and advice, and where appropriate assign a Reporting Officer. The SO will send a Complaint/Incident Report Form to be completed by the complainant and returned to the SO.
5. In such cases, a copy of the Complaint/Incident Report Form is forwarded to the Reporting Officer by the SO.
6. The Reporting Officer will follow the standard reporting procedures.

COMPLAINTS PROCEDURE FOR PARENTS

There may be occasions when parents have cause for concern e.g. about a Leader, a Guiding event or another child in the Unit. IGG takes complaints seriously, and has set out the following procedure.

When a parent/guardian makes a complaint known to the Leader/Commissioner, the following steps should be taken:

- An informal meeting to discuss the complaint should be arranged with the parent/guardian and the Leader of the Unit, in the presence of another Leader/adult. The Leader should outline the Irish Girl Guides complaints procedure, including the availability of a Complaint Form.
- If the parent/guardian wishes to further this matter, they may complete the Complaint Form and return it to the Safeguarding Officer, c/o National Office.
- A copy of the form will be given to the appropriate Leader.
- The Safeguarding Officer will ensure that a Reporting Officer is allocated and give her a copy of the Complaint Form.
- The Reporting Officer will then make direct contact with the complainant, and will adhere at all times to IGG’s Safeguarding and Child Protection booklet.

Telephone: 01 668 3898
Email: safeguarding@irishgirlguides.ie
REPORTING PROCEDURE FOR A COMPLAINT/INCIDENT OTHER THAN A SUSPICION OF ABUSE

1. Every Leader/Unit Helper can confidentially contact the Safeguarding Officer in the event of a problem occurring.
2. If the matter is with regards to a complaint against a Leader or Unit Helper the standard complaint procedures as outlined in this booklet should be adhered to as appropriate.
3. The SO offers support and advice and, where appropriate, assigns a Reporting Officer.
4. A Complaint/Incident Report Form must be completed by the complainant and sent to the SO immediately.
5. In cases where a Reporting Officer is assigned, a copy of the Complaint/Incident Report Form is forwarded to her by the SO and the Reporting Officer makes contact with the complainant.
6. The Reporting Officer keeps the SO and the relevant Commissioner informed regularly in relation to the complaint in accordance with the guidelines provided to the Reporting Officer. However in certain cases which may be very confidential and/or where the complaint made is actually against the Commissioner, the Reporting Officer will only inform the SO.
7. Please note IGG will not accept complaints which are deemed to be malicious or of a frivolous or vexatious nature. If at any time during the investigation it becomes clear that the complaint is frivolous, vexatious or malicious the Reporting Officer can determine that there is no case to answer and close the case.
8. The Reporting Officer compiles a full report on the case and submits it to the SO. The complainant and appropriate people concerned in the case are advised of the outcome by the SO.
9. If the Reporting Officer determines that the member has breached IGG’s standards, policies and/or procedures formal disciplinary procedures will be invoked. Please refer to information on the disciplinary procedures in this booklet and the steps which shall be followed.
10. When the case is closed, all related documents are confidentially stored in National Office in compliance with the Data Protection legislation.

Please note in the interests of fairness and transparency, anonymous complaints will not be accepted by IGG.

CONFIDENTIALITY

All cases/incidents will be treated as strictly confidential.
CHALLENGING OR DISRUPTIVE BEHAVIOUR OF MEMBERS (OTHER THAN LEADERS)

In the *Personal Registration Form for Girls* it is stated that a reasonable standard of behaviour, including respect for Leaders and all other members is expected at all times. This form is signed by the parent/guardian of the girl as well as by girls of Guide age upwards. A copy of the conduct guidelines is retained by the parents/guardians and the girl.

It is recommended that instances of disruptive behaviour which require the intervention of a Leader and which put at risk the safety and wellbeing of others be documented in the Accident and Incident Log Book. The report should describe:

- the programme running at the time
- what happened
- who was involved
- where and when it happened
- what was said if significant
- any injury to person or damage to property
- how the situation was resolved

This book should be made available to the Commissioner and the SO, if required or requested.

PROCEDURES FOR DEALING WITH CHALLENGING OR DISRUPTIVE BEHAVIOUR

If a child's behaviour is disruptive on a number of occasions and you have already tried to deal with it at Unit level without success, you should have an informal chat with her parent/guardian where appropriate, to gauge if there is anything going on at home or outside of the Unit which could be affecting the child and contributing to her behaviour e.g. separation of parents, upset over arrival of new little sister or brother, bullying in school. This way you will have a better insight into the cause of the behaviour and also the parent/guardian will be aware of the situation and hopefully be able to address it so that it does not continue.

If the child's behaviour continues to be disruptive and interferes with the organised running of the Unit, then in the best interest of the Unit the following steps should be taken:

1. Discuss the child's behaviour with another Leader and ensure that this Leader is present if any action has to be taken e.g. meeting with parent/guardian.
2. Talk with or write to the parent/guardian explaining the situation. A written warning of suspension/membership termination if child's behaviour continues should be given to parent/guardian either in person or by letter. Any such correspondence must be sent direct to the parent/guardian and not sent home with the child in question.
3. Inform the Commissioner of the situation and steps that were taken.
4. If the child continues to be disruptive, suspend her for up to one month. Inform the parent/guardian as above.
5. If the child returns and is still disruptive, the Commissioner, in consultation with the Leader, will ask her to leave and inform the parent/guardian as above.

If the parent/guardian disagrees with any of the steps taken, they can complete the *Complaint Form* and return it to the SO as per the Complaints Procedure for Parents.

*Leaders can contact the SO for advice/support at any stage of proceedings.*
Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, which could reasonably be regarded as undermining those individuals’ right to dignity.

Bullying comes in many forms i.e. direct, indirect, verbal, physical, gesture, cyber-bullying, relational, extortion, homophobic, racial and mobbing.

Bullying can happen from peer to peer of any age, from adult to child and in some cases child to adult. IGG regards bullying as a serious infringement of any individual’s rights and a serious threat to self-esteem of the victim. IGG is committed to creating an environment free from bullying and any such behaviour is unacceptable and will not be tolerated.

SIGNS THAT A CHILD MAY BE BULLIED

Symptoms of possible bullying are often overlooked or unrecognised.

They can include:

- unexplained bruising, cuts or damaged clothes
- pattern of physical illnesses e.g. headaches, stomach aches
- visible signs of anxiety or distress - stammering, crying
- reluctance and/or refusal to say what is troubling her
- unexplained mood swings or behaviour;
  - becoming withdrawn
  - becoming clingy
  - attention seeking
  - aggressive behaviour
- out of character behaviour in the Unit
- loss of concentration and loss of enthusiasm
- loss of interest
- erratic attendance
- lingering behind after meeting/event is over

However, it is important to remember that, while a child could be displaying some or all of these signs, this does not necessarily mean that she is being bullied. If you are concerned you should contact the Safeguarding Officer.

TYPES OF BULLYING INCLUDING DEFINITIONS

**Direct Bullying:**

When people are asked to describe bullying this is normally the type of bullying that they will describe. With direct bullying the behaviour is obvious and bystanders will be aware of it. Types of direct bullying include physical or verbal bullying.

**Indirect Bullying:**

This type of bullying is more difficult to recognise. Types of indirect bullying include intimidation or isolation.
Verbal Bullying: Slandering or ridiculing an individual; Using a person as the butt of jokes. Includes:

Slagging: this behaviour usually refers to the good natured banter which goes on as part of the normal social interactions between people. However, when this slagging extends to very personal remarks aimed again and again at the same target then it may be described as bullying;

Abusive telephone calls: the abusive and/or anonymous telephone call is also a form of verbal intimidation or bullying;

Name calling: persistent name calling directed at the same target(s), which hurts, insults or humiliates should be regarded as a form of bullying behaviour. Most name calling of this type refers to physical appearance. Accent or distinctive voice characteristics may attract negative attention and academic ability can also provoke name calling.

Physical Bullying: Pushing, shoving, pinching, hitting, kicking, poking, and tripping people up. Includes:

Assaults or threats of physical assaults; Damage to a person's work space or property.

Gesture Bullying: Non-verbal gestures/glances which can convey threatening or frightening messages/intent.

Cyber Bullying: This involves unwanted messages, images, audio or video sent by electronic means to threaten, abuse or harm someone. This can occur through text and apps, or online in social media, forums or gaming where people can view, participate in, or share content and includes sending, posting, or sharing negative, harmful, false, or mean content about someone else.

Relational Bullying: This type of bullying is most common among girls. It is any behaviour that sets out to deliberately damage another person's friendships or feelings of inclusion in a friendship group. Behaviours involved in this type of bullying include exclusion, isolation, subtle verbal aggression, gossip and rumours (Ref: Suckling and Temple, 2001).

Extortion: The deliberate extraction of money or other items of property accompanied by threats.

Homophobic Bullying: Homophobic bullying is a kind of bullying that is typically aimed at young people who are homosexual, or who are perceived to be homosexual. This can involve name-calling, isolation and violence. It includes any references to a person's sexuality e.g. trans, bi or intersex. Homophobic bullying is very common and demeaning (Ref: BeLonG To, 2006).

Racial Bullying: Racial bullying can be expressed physically, socially or psychologically when one is labelled negatively as being different from others according to one's race.

Mobbing: This is another word for bullying. Mobbing generally means that the target is being bullied by a group of perpetrators and not just one perpetrator.
WHAT A LEADER SHOULD DO IF SHE SUSPECTS A CHILD IS BEING BULLIED
AN INCIDENT OF BULLYING IS REPORTED

The Leader should assess the situation informally first to see if there is any alternative explanation for her concerns or to see how serious the incident was and if there is any underlying reason behind the inappropriate behaviour.

The Leader should chat with the parent/guardian, other Leaders and/or other children in the Unit, where appropriate, in a non-formal and discreet manner to gain more information. This could be approached by enquiring if there is anything going on at home or school affecting the child as she seems out of sorts or hasn’t been herself lately etc. There may be something going on outside of the Unit which you are unaware of e.g. death or illness of a family member, separation of parents, death of a family pet, bullying in school.

If there is no cause for concern, the Leader should note her concern and any action taken on an incident report form. As with most things, prevention of bullying is better than trying to deal with consequences therefore, raising the awareness of bullying in the Unit through activities is a good way of addressing this issue (activities on bullying can be found on OGM).

If there is cause for concern the following procedures should be followed:

1. Immediately record on paper the FACTS as you know them. The report will be objective and you will note what was actually observed and, if appropriate, the exact words used. If there has been an incident, ensure it is recorded on an Incident Report Form.

2. Discuss your concern/incident with the other Leaders in your Unit to see if they can provide any further information and ensure that one other Leader is present if any action has to be taken e.g. meeting with parent/guardian or child/children.

3. Meet with the parent/guardian of the parties involved, as appropriate, to explain the situation, to discuss how the matter can be resolved and what actions will be taken.

4. Following consultation with the other Leaders and after talking with the parent/guardian where appropriate, the Leader should chat discreetly with all parties involved in order to gain more insight into what has been happening, when it started, who is involved and why.

5. The Leader should talk to child/children responsible for the bullying about their behaviour and type of behaviour expected of her/them. The child/children should be encouraged to offer an apology and undertake not to behave in this manner again.

6. The Leader should keep a written factual record of all details regarding this matter including all meetings/conversations, who was present, what was discussed, dates and times. The records should be signed and dated and kept securely by the Leader while the child is a member.

7. The Leader should monitor the situation to ensure that the bullying is not repeated.

8. If the situation continues to give cause for concern then inform the Commissioner of the matter and steps that were taken. The Leader should then refer to the Procedures for dealing with challenging or disruptive behaviour which should now be followed.

Leaders can contact the SO for advice/support at any stage of proceedings.
CHILD ABUSE

TYPES OF CHILD ABUSE

Child abuse is a term used to describe ways in which children are harmed, usually by adults and often by people they know and trust. It refers to the damage done to a child’s physical or mental health. Children can be abused within or outside their family, and possibly even in the Guiding environment. This can take the form of physical abuse, emotional abuse, neglect and sexual abuse.

In some cases of child abuse, the alleged perpetrator will be another child i.e. peer abuse. In a situation where child abuse is alleged to have been carried out by another child, you should consider it a child welfare and protection issue for both children and you should follow child protection procedures for both the victim and the alleged abuser, with the needs of the victim being paramount.

NEGLECT includes situations where:

- a child is persistently left alone without adequate care and supervision
- a child is deprived of basic needs e.g. food, clothing, warmth or hygiene
- there is a lack of protection and exposure to danger
- there is failure to provide adequate care for the child’s medical and developmental needs

EMOTIONAL ABUSE can occur where:

- there is a persistent lack of attention and emotional unavailability by parent/carer
- there is constant overprotection, which prevents appropriate socialisation
- children are frequently shouted at or taunted
- there is constant criticism or unrealistic pressure to perform

PHYSICAL ABUSE can include:

- severe physical punishment e.g. beating, slapping, hitting or kicking
- use of excessive force in handling
- giving children alcohol, inappropriate drugs or poison
- exposing children to activities, the nature and intensity of which exceed the capacity of the children’s immature and growing bodies

SEXUAL ABUSE occurs when adults use children to meet their own sexual needs. It can include:

- exposing children to pornographic books, videos, photographs or websites
- using children for pornographic purposes
- inappropriate sexual acts, fondling, oral sex, masturbation or full intercourse
- any sexual act internally performed in the presence of a child

SIGNS OF CHILD ABUSE

There are signs that could alert you to the fact that a child MIGHT BE being abused.

For example if:

- a child appears to have suffered a suspicious injury for which no reasonable explanation can be offered
- a child begins to use explicit language or show age-inappropriate sexual play or knowledge
- a child shows sudden changes in behaviour e.g. attention seeking behaviour, becomes withdrawn or aggressive
- a child seems distressed without obvious reason or displays persistent or new behavioural problems
- a child says something to alert you that abuse is taking place
• a child shows unusual or fearful responses to an adult who is responsible for their care at any particular time
• you observe a change over a long period of time e.g. the child losing weight or becoming increasingly dirty or unkempt
• a child shows reluctance to attend or leave after a meeting

However, it is important to remember that, while a child could be displaying some or all of these signs, this does not necessarily mean that she is being abused. Similarly, there may not be any obvious signs, you may just feel something is wrong. If you are worried, it is not your responsibility to decide if it is abuse or not, but it is your responsibility to record the facts and report the matter to the SO who will assign a Reporting Officer to investigate.

More details on this can be found in the Code of Good Practice, Child Protection for the Youth Work Sector.

ONLINE SAFETY

It is important to ensure the appropriate use of social media within a Unit. Guides and Senior Branch should be made aware of risks in relation to their use of technology, including:

Cyberbullying – please see definition for this as stated earlier.

Sexting - sending of messages, images and videos of a sexual nature. This includes photos in which people are naked or of genitalia as well as messages which talk about performing sexual acts.

Grooming - befriending and establishing an emotional connection with a child, and sometimes the family, to lower the child’s inhibitions with the objective of sexual abuse.

THE PROTECTIONS FOR PERSONS REPORTING CHILD ABUSE ACT 1998

Please note: There is legislation in place to protect those reporting suspected child abuse. The Protections for Persons reporting Child Abuse Act 1998 provides immunity from civil liability to persons who report child abuse ‘reasonably and in good faith’ to the SO, Reporting Officer, Health Board (now Tusla - Child and Family Agency) or An Garda Síochána. This protection applies to organisations as well as individuals. The Act also states that where a person reports abuse to an appropriate person, knowing that statement to be false, this is an offence under that Act.

WHAT A LEADER SHOULD DO IF SHE SUSPECTS THAT A CHILD IS BEING ABUSED

The ability to recognise child abuse depends as much on the Leader’s willingness to accept the possibility of its existence as it does on knowledge and information. It is important to note that child abuse is not always visible and may not be clearly observable. It is also important to remember that many signs of abuse are non-specific and that alternative explanations for indicators should be considered.

1. Immediately record on paper the FACTS as you know them. The report will be objective, and you will note what was actually observed and, if appropriate, the exact words used. Do not question the person complained of, or any witnesses. Maintain utmost confidentiality in this regard.
2. Contact the SO who will make contact with the Reporting Officer without delay.
3. The Reporting Officer will contact you to request that you send a signed and dated copy of the report to her. She will then seek appropriate advice.
4. Ensure that no Guiding situation arises which could cause any further concern to the child.

Leaders can contact the SO for advice/support at any stage of proceedings.
WHAT A LEADER SHOULD DO IF A CHILD DISCLOSES ABUSE (OTHER THAN BULLYING)

Children will sometimes disclose that they are being physically or sexually abused, or bullied. They are less likely to disclose emotional abuse or neglect. It is possible that Leaders will become concerned because of a child’s behaviour, or because of something that is reported by another person.

1. Listen sensitively to the child without interrupting or passing judgement. Avoid asking leading questions. Accept what is said. Stay calm and show that you are taking her seriously. Check with the child to ensure that what has been heard and understood by you is accurate. Do not express any opinions about the alleged abuser.

2. Tell the child that you will offer as much support as possible but that you have to pass the information on to the appropriate person (Safeguarding Officer). **(N.B. Use language appropriate to the age of the child concerned.)**

3. Immediately afterwards, record the conversation factually and in as much detail as possible on paper. Sign and date the record.

4. Contact the SO. If it is regarding disclosures of bullying, she will offer advice on procedures to follow and, if appropriate, will assign a Reporting Officer. If it is regarding disclosures other than bullying, the SO will make contact with a Reporting Officer immediately. The Reporting Officer will contact you to request that you send a signed and dated copy of your report to her. She will then seek appropriate advice.

5. Explain and ensure that the child understands the procedures that will follow.

6. Ensure that no Guiding situation occurs which could cause any further concern to the child.

7. All information regarding concerns of child abuse must be shared only on a ‘need to know’ basis, and must not be used for any other purpose. Don’t question the person complained of, or any witnesses, and do maintain utmost confidentiality in this regard.

Leaders can contact the SO for advice/support at any stage of proceedings.

**IN ALL CASES, YOU MUST REFER – NOT INVESTIGATE. CONFIDENTIALITY IS IMPORTANT.**
WHAT TO DO IF ANY LEADER/UNIT HELPER/SENIOR BRANCH MEMBER OVER 18/TREFOIL GUILD MEMBER IS ACCUSED OF ABUSE

If an allegation of abuse is made against a Leader/Unit Helper/Senior Branch member over 18/Trefoil Guild member, such a complaint or allegation is deemed to be of such severity that a Reporting Officer will immediately be assigned by the SO to investigate the matter. Once the allegation has been made, it is treated as a serious disciplinary matter. All allegations should be assessed promptly and carefully.

- If a Leader/Unit Helper/Senior Branch member over 18/Trefoil Guild member is accused of abuse, the person to whom the allegation is made must immediately record on paper the FACTS as made known to them.
- This person will then contact the SO who will make contact with a Reporting Officer. *(Where the allegation is made against a Reporting Officer, the allegation should be reported to the Chief Commissioner or Tusla - Child and Family Agency.)*
- The Reporting Officer will contact the informant to request that a signed and dated copy of the report be sent to her. The Reporting Officer will immediately investigate the complaint/allegation.
- Once the allegation has been made, it is a serious disciplinary matter, and the Leader/Unit Helper/Senior Branch member over 18/Trefoil Guild member will be immediately withdrawn from all aspects of Guiding.
- The Reporting Officer will contact Tusla - Child and Family Agency to seek appropriate advice and act within the guidelines laid down by the Department of Health and Children. It is of the utmost importance that persons reporting suspected child abuse to Tusla - Child and Family Agency or An Garda Síochána should establish an objective basis for their concerns. For more details, please refer to the Code of Good Practice, Child Protection for The Youth Work Sector.
- Any further steps by the Irish Girl Guides will be taken on the advice of the appropriate authorities.

Leaders/Unit Helpers can contact the SO for advice/support at any stage of proceedings.

**IGG REPORTING PROCEDURE**
DEALING WITH A DISCLOSURE/CONCERN/SUSPICION OF CHILD ABUSE

Where there are reasonable grounds for concern that a child may have been, is being, or is at risk of being abused or neglected this should be reported immediately as per IGG's Reporting Procedures.

**Dealing with a Disclosure / Concern / Suspicion of Child Abuse**

1. Ensure no Guiding situation arises that may cause further concern
2. Forward Signed/Dated Report
3. Contact the Safeguarding Membership Officer
4. Maintain Confidentiality
5. Record Facts

In the event that a child is at immediate risk of harm and it is outside of National Office hours, and National Office is closed, you should contact your local Tusla - Child and Family Agency directly. In case of emergencies outside of Tusla - Child and Family Agency hours, (Monday to Friday 9am–5pm) your local Garda Síochána should be contacted.

**Dealing with a Disclosure / Concern / Suspicion of Child Abuse after 5pm**

1. Ensure no Guiding situation arises that may cause further concern
2. Forward Signed/Dated report
3. Inform Safeguarding Membership Officer the next working day
4. Contact An Garda Síochána
5. Maintain Confidentiality
6. Record Facts
INTRODUCTION

IGG is a volunteer-led organisation that operates on a basis of trust. At the same time, it is run in a professional manner and Safeguarding and Child Protection booklet embodies the values and principles that underpin the association. Volunteers have rights and responsibilities, as does IGG as an organisation. In general, there is an implicit understanding and expectation that difficulties should be sorted out informally and confidentially.

However, if a member’s conduct or performance is considered to be in breach of IGG’s standards, policies and/or procedures, it may be necessary to invoke formal procedures and take disciplinary action. Please see the procedures below which should be followed as appropriate.

1. PROCEDURES FOR DISCIPLINARY ACTION AGAINST A MEMBER AT LOCAL LEVEL

If a complaint is made against a member at local level the standard complaint procedures are adhered to and where necessary a Reporting Officer assigned to investigate.

If a member refuses to co-operate with the complaints procedure, this will not prevent IGG from proceeding with an investigation because the other parties referred to in a complaint are entitled to due process. Accordingly, a complainant who refuses to co-operate with an investigation will be advised that the investigation will proceed. Based on the information that becomes available during the process, IGG will then form its conclusions regarding the complaint and take whatever action may be necessary.

If the Reporting Officer determines that the member has breached IGG's standards, policies and/or procedures the Safeguarding Officer will be informed. The SO will subsequently pass on the information to the Managing Director.

The Managing Director will initially call a meeting of the Disciplinary Panel to assess the report findings. The Disciplinary Panel will consist of the Managing Director and two other people not associated with the case. They will make a decision on what action should be taken next i.e. standard disciplinary procedures followed, whether immediate sanctions need to be imposed or whether immediate termination of membership is appropriate. Each case will be dealt with on a case by case basis. At all stages confidentiality will be adhered to.

2. PROCEDURES FOR DISCIPLINARY ACTION AGAINST A MEMBER AT REGIONAL AND/OR NATIONAL LEVEL

If there is a concern over a member’s conduct or performance at Regional and/or national Level the SO should be informed. The SO will subsequently pass on the information to the Managing Director who shall use her best endeavours to resolve any issues as raised and where necessary will follow procedures as set out below.

In all cases of alleged serious misconduct, a full investigation will be carried out to establish the facts.

- The investigation will be conducted thoroughly and objectively by a Reporting Officer with due respect for the rights of the member to natural justice.
- The investigation will be governed by clear terms of reference.
- Every effort will be made to carry out the investigation within three months, although timescales may be extended in exceptional circumstances.
- The member will be advised of the right to be accompanied by a person of choice throughout the investigation and at any subsequent hearings, should such arise.
If a member refuses to co-operate with the complaints procedure, this will not prevent IGG from proceeding with an investigation because the other parties referred to in a complaint are entitled to due process. Accordingly, a complainant who refuses to co-operate with an investigation will be advised that the investigation will proceed. Based on the information that becomes available during the process, IGG will then form its conclusions regarding the complaint and take whatever action may be necessary.

On completion of the investigation, the Reporting Officer will submit a written report of her findings to the Managing Director and to the member.

If the Reporting Officer determines that the member has not breached IGG’s standards, policies and/or procedures, she will be informed officially by the Managing Director that her name has been cleared.

If the outcome of the investigation is that, on balance of probability, the member is guilty of the alleged misconduct, formal disciplinary procedures will be invoked. The Managing Director will initially call a meeting of the Disciplinary Panel to assess the report findings. The Disciplinary Panel will consist of the Managing Director and two other people not associated with the case. They will make a decision on what action should be taken next i.e. standard disciplinary procedures followed, whether immediate sanctions need to be imposed or whether immediate termination of membership is appropriate.

Each case will be dealt with on a case by case basis. At all stages confidentiality will be adhered to.

**STAGES OF DISCIPLINARY PROCEDURES**

The disciplinary procedures adhere to principles of natural justice which include the right to:

- be heard
- know the allegations in the matter, why a sanction is being imposed, the manner in which the issues will be determined, and any other relevant information that will be taken into account
- impartiality in both the investigation and the decision-making process

A member also has the right to an appeal hearing.

The stages of the disciplinary procedure are as follows:

**STAGE 1: ORAL/VERBAL WARNING**

A member whose conduct falls below required standards or is deemed to be in breach of IGG policies will be issued with a formal oral/verbal warning by the Managing Director. The member will be advised of the precise nature of the complaint, the improvements required and the timescale for same. If any immediate sanctions are imposed by the Disciplinary Panel the member will be informed of these and also given written confirmation of these by the Managing Director. Failure to improve may result in further disciplinary action under Stage 2 of the procedures. A record of the warning will be kept on file and then removed after the stipulated period, subject to satisfactory improvement.

**STAGE 2: WRITTEN WARNING**

If the member fails to make the necessary improvements, or if the conduct is more serious, then a formal written warning will be issued by the Managing Director. As in Stage 1, the formal written warning will specify the precise nature of the complaint, the improvements required, the timescale for same, plus any appropriate sanctions that may be imposed. A record of the warning will be kept on file and then removed after the stipulated period, subject to satisfactory improvement.

**STAGE 3: FINAL WRITTEN WARNING**

If there is still no evidence of improvement, or if the conduct is extremely serious, a final written warning will be issued by the Managing Director. It will specify the precise nature of the complaint, the improvements required, the timescale for same and appropriate sanctions. The member will also be advised that failure to improve will lead to a disciplinary hearing.
STAGE 4: DISCIPLINARY HEARING

If the requirements of Stage 3 are not met, the Managing Director will request the member to attend a disciplinary hearing. Sanction(s) may include suspension or termination of membership of IGG. The hearing will be conducted by the Disciplinary Panel. The Chief Commissioner of IGG will not be a party to the disciplinary hearing.

The progressive stages of this disciplinary procedure may not apply to some offences for which the consequence may be termination of membership without notice. Examples include theft, fraud, falsification of documents, gross negligence, dereliction of duties, an inability to act responsibly as a result of substance misuse, and bullying or harassment of other members. This list is not exhaustive.

APPEAL HEARING

A member who wishes to appeal the outcome of a disciplinary hearing may do so within seven working days of the notification of the decision. The appeal must be in writing and state the ground(s) on which the appeal is being made.

An appeal hearing is not intended to repeat the investigation and disciplinary stages but to address specific issues which the member feels may have received insufficient consideration, such as mitigating circumstances, procedural deficiencies or the severity of the sanction imposed.

The member will be invited to attend an appeal hearing which will normally be held within ten working days of the appeal being lodged. The hearing will be conducted by the Chief Commissioner and one other person with no association to the case.

If the member is not satisfied with the outcome of the appeal hearing, it is open to her to take her case to the Executive Committee of IGG and thereafter to the General Council of IGG, as per the Constitution if she so chooses. The member must make her intention to appeal known to the Managing Director within 14 days of notice of the termination of her membership. Details of the appeal must be lodged with the Managing Director within 7 days of notification of the appeal. A meeting of the General Council will be called within 30 days. The member against whom a complaint has been made will be entitled to arrange for someone to attend with her for moral support.

A record of the investigation and any hearings will be kept on file in IGG in compliance with the Data Protection legislation.
APPENDIX 1 - ACCIDENT REPORT FORM

INJURED PARTY:
Name: ___________________________ Age: ___________________________
Address: ___________________________
Name of Unit: ___________________________
Name of Unit Leader: ___________________________
Address of Unit Leader: ___________________________

CIRCUMSTANCES:
Date and Time of Accident: ___________________________
Location of Accident: ___________________________
Leader in Charge at time of Accident: ___________________________
Other adults present: ___________________________
Full description of accident (use extra sheet of paper if necessary): ___________________________
Nature and extent of injuries suffered (please advise of any pre-existing medical problems):
Name and Address of Doctor/Dentist attending injured party (if applicable): ___________________________
Name and Address of hospital attended (if applicable): ___________________________
Have medical and other expenses been incurred? Yes ☐ No ☐
If Yes, please give details: ___________________________
Name and Address of witness(es) to accident: ___________________________

DECLARATION:
I / We declare the foregoing particulars are true in every respect.
Signature: ___________________________ Date: ___________________________

Please make three copies of this form and
• send one to LHK Insurance Ltd., Avoca Court, Temple Road, Blackrock, Co. Dublin.
• return one copy to Irish Girl Guides National Office, 27 Pembroke Park, Dublin 4
• and keep one copy for your own records
APPENDIX 2 - INCIDENT REPORT FORM

To be used for the reporting of an incident other than an accident. For an accident resulting in an injury the IGG Accident Report Form must be used. Further information may be attached on another page.

DETAILS OF INCIDENT:
Type of incident: 
Date and Time of incident: 
Location of incident: 
Details of incident: 

PERSONS INVOLVED IN INCIDENT:
Name: 
Position (e.g. Leader/Unit member/visitor): 
Address: 
Name: 

Position (e.g. Leader/Unit member/visitor): 
Address: 

INJURIES OR DAMAGE RESULTING FROM INCIDENT:
Injuries/Damage: 
Action taken: 

WITNESSES TO INCIDENT:
Name: Contact Details: 
Name: Contact Details: 
Name: Contact Details: 

REPORTING OF INCIDENT:
Reported to: 
Name: Position: 
Reported by: 
Name: Position: 

Signed: Date: 

The Unit Leader should keep a copy of this form for Unit Records. Please return the completed form to the Safeguarding Officer, Irish Girl Guides National Office, 27 Pembroke Park, Dublin 4.
APPENDIX 3 - COMPLAINT FORM

To be used in the event of a complaint. For an accident resulting in an injury the IGG Accident Report Form must be used. Further information may be attached on another page.

DETAILS OF COMPLAINT:
Type of complaint:  
Date and Time (if appropriate):  
Location:  
Details of complaint:  

PERSONS INVOLVED IN COMPLAINT:
Name:  
Position (e.g. Leader/Unit member/visitor):  
Address:  
Name:  
Position (e.g. Leader/Unit member/visitor):  
Address:  

INJURIES OR DAMAGE RESULTING FROM COMPLAINT:
Injuries/Damage:  
Action taken:  

WITNESSES TO COMPLAINT (IF APPROPRIATE):
Name:  Contact Details:  
Name:  Contact Details:  
Name:  Contact Details:  

REPORTING OF COMPLAINT:
Reported to:  
Name:  Position:  
Reported by:  
Name of complainant (Block Capitals):  
Contact Details:  

Signed:  Date:  

The Unit Leader should keep a copy of this form for Unit Records. Please return the completed form to the Safeguarding Officer, Irish Girl Guides National Office, 27 Pembroke Park, Dublin 4.
APPENDIX 4 - DATA PROTECTION GUIDANCE NOTES FOR VOLUNTEERS

Introduction
The General Data Protection Regulation (GDPR) is a new EU regulation which came into force on 25 May 2018 replacing the existing data protection framework under the EU Data Protection Directive. Its aim is to improve privacy and give greater control to customers and citizens over their personal information and how it is used.

Many of the main concepts and principles of GDPR are much the same as those of the Data Protection Acts 1988 and 2003. However, GDPR introduces new elements and significant enhancements which will require detailed consideration by organisations involved in processing personal data. The GDPR safeguards the privacy rights of individuals in relation to the processing of their personal data. When organisations gather personal data for any purpose, they must comply with the obligations of this.

The GDPR emphasises transparency, security and accountability by data controllers while at the same time standardising and strengthening the right of European citizens to data privacy. The GDPR introduces significant fines for non-compliance and for non-reporting of data breaches, and gives individual's a greater say over what organisations are allowed to do with their data.

Responsibility for ensuring personal data is processed in accordance with data protection regulations lies with the data controller i.e. Irish Girl Guides and/or data processor i.e. 3rd party processors. While IGG has ultimate responsibility for compliance, all those who collect and process personal data on behalf of IGG i.e. staff and volunteers need to be aware of their responsibilities.

The Data Protection regulation makes no distinction between the status of the data management activities of the employees and the processing activities of volunteers. Therefore staff and volunteers who gather and process personal data, are doing so on behalf of IGG, and must comply with IGG's data management policies and general policies on confidentiality in order to protect IGG's reputation and to avoid breaches.

In line with the requirements of Irish and European Data Protection legislation namely the Data Protection Act 2018, GDPR and EC Electronic Communications Regulations (2011), IGG's data management policies i.e. Data Protection Policy, Data Retention Policy/Data Retention Schedule, Data Destruction Policy have been updated. These policies apply equally to personal data held in both manual and automated form and both should be treated with equal care.

IGG depend on volunteers to manage its day-to-day activities at local and regional level and these guidelines are to assist our volunteers manage the personal data they have access to and process in a compliant manner.

Terminology
The following terms are defined within GDPR legislation:

**Personal Data**
This means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

**Sensitive Personal Data**
The GDPR refers to sensitive personal data as “special categories of personal data” which specifically include genetic data, and biometric data where processed to uniquely identify an individual.
Processing
This means performing any operation or set of operations on the personal data, whether by manual or automatic means. This includes data collecting, organising, storing, altering, disclosing, sharing or adapting.

Data Controller
This means any organisation responsible for the processing of the personal data.

Data Processor
This means any organisation or individual which processes personal data on behalf of the data controller, but is not an employee of the data controller. This would include any third-party organisation using member data to help the organisation with direct marketing, fund-raising, member registration, etc.

Data Subject
This means an individual who is the subject of the personal data.

Processing Principles & Accountability
Under GDPR there are 7 Principles echoing the previous data protection regime. When processing personal data, a charity which is a data controller must comply with all of the following principles:

1. Lawfulness, fairness and transparency – personal data must be processed lawfully, fairly and in a transparent manner.

2. Purpose limitation - personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

3. Data minimisation – personal data must be adequate, relevant and limited to what is necessary in relation to purposes for which they are processed.

4. Accuracy – personal data must be accurate and, where necessary, kept up to date. Inaccurate personal data should be corrected or deleted.

5. Retention – personal data should be kept in an identifiable format for no longer than is necessary.

6. Integrity and confidentiality – personal data should be kept secure.

7. Accountability – organisations must not only comply with the above six general principles but must be able to demonstrate that they comply by documenting and keeping records of all decisions.

Data Management / Security
Failure to keep personal data safe and secure is one of the biggest causes of breaches of the data protection, and one of the most damaging things that can happen to an organisation. It undermines the members’ trust in the organisation, as well as damaging the organisation’s reputation and its credibility. In the unfortunate event of a breach, the Data Controller (in this case, IGG) is equally liable, whether an employee or a volunteer causes the breach. This responsibility will be incurred irrespective of the location of the data breach within the organisation. The responsibility for the security and safety of personal data which is held by IGG rests with each person who has access to that data, whether in paper or electronic form.

In order to ensure there is no security breach, volunteers and staff should adopt the appropriate security measures as listed below:

Purpose & Access
- Members informed of purpose/s for which their personal data will be used in addition to administration of membership i.e. may include processing subscriptions, notification of events etc.
- The personal data of IGG members should not be generally available, and only the minimum amount of data should be provided to those who need it.
- When someone leaves the Unit, personal data records i.e. Registration Forms, bank statements etc. which they may have would need to be returned to the Unit/District for secure filing.
Computers & OGM

- Recommended that for all computers, laptops and mobile devices, the screen should ‘lock’ after a few minutes of inaction, or when left unattended, and only re-activated by keying in a password.
- Where personal records are saved on mobile device or laptop, they should be saved in a secure, password protected folder, never on the main drive or desktop of device.
- Encryption/Password - OGM, computers/mobile devices should be password protected, and access/login codes should not be shared with anyone else including Leaders in your Unit/District.
- When someone with access to OGM leaves the Unit their access must be removed immediately by the Unit administrator. This does not happen automatically when someone is made inactive on OGM.
- The Membership Administrator should be informed when someone with access to OGM moves position within IGG as their levels of access may need to be amended accordingly.
- Leaders who access the OGM system from a shared computer must:
  - Ensure that they use a separate email address for any correspondence to keep such messages confidential.
  - Have a password-protected user account on the computer, so that browser settings and files are not shared with, or accessible to others.
  - Ensure that they log fully out of the account when not in use or when the computer is unattended.

Storage

- Ensure all files containing personal data are stored in a secure manner e.g. locked away when not in use or left unattended on a desk at home or in the Unit meeting place. They should be transported securely and not left in a car overnight.
- IGG member records i.e. group lists, contact details, Personal Registration Forms, Consent forms etc., should be kept to a minimum, stored securely and shredded once no longer required or forwarded to National Office as appropriate.

Communications

- Anyone sending out communication or correspondence on behalf of IGG or using IGG volunteers contact details should be aware that the communication must be in compliance with the Data Protection legislation, previously outlined in the seven principles.
- Emails sent to several recipients at once i.e. group emails should use the bcc (“blind copy”) field to prevent the unnecessary disclosure of recipients’ email addresses.
- Leaders who use group messaging e.g. WhatsApp, Messenger, Viber, should follow the Guidelines on the Use of Group Messaging in IGG because once an individual is added to a group their number is automatically viewable to all those within the group. Therefore prior consent is required from all.
- Emails with regards personal/confidential data sent through smart phones, mobile devices, tablets, etc. should be kept to a minimum, and only sent using secure device and secure email. Please change the security settings if using Gmail/Hotmail/Yahoo to ensure they are secure.
- File attachments containing personal data sent via email should be encrypted or password protected and the encryption/password then sent in a separate email.
- Where personal/confidential data is sent or received on behalf of IGG or where parents are contacted by email, a private email address must be used and not a shared email e.g. shared family email.

Paper & tickets

- Once the details from paper forms have been keyed into OGM these should either be filed and stored securely for as long as required, or should be shredded and destroyed in accordance with IGG’s Retention Schedule.
- Personal data in paper form, including correspondence which contains personal contact details, should not simply be thrown in the rubbish. They should be shredded before being disposed of.
- With regards selling a line in a raffle – the person’s name and contact details can be collected for the purpose of the draw, once the person gives their permission to enter the raffle and provides their personal details. However once the raffle is over this information should be disposed of securely and not stored or used for any other purpose.

Photos

- With regards taking group photos at enrolment ceremonies/events - the Leaders should check the Personal Registration Forms for parent/guardian consent to ensure permission has been provided to take photos for IGG purposes. The Leaders must advise the parents/Unit Helpers that they are only permitted to take photos of their own child for personal use unless they have been given specific permission to do so by another. Please check the Guidelines on the Use of Images for further information.
Records Retention and Destruction
IGG will need to keep certain categories of personal data for different periods of time – in some cases, in order to provide administrative services, in other cases to meet its legal obligations or maintain a historical archive of the organisation. IGG needs to strike a balance between satisfying its legal obligations, and minimising the risk of data loss by removing or destroying any data which is no longer required. One of the principles of GDPR is that the organisation is encouraged to keep the data only for as long as necessary.

IGG have Data Retention and Destruction policies in place based on these obligations. IGG Executive committee, Leaders, volunteers and staff who have access to personal records should be aware of the Retention and Destruction policies, and they should ensure that records are only kept for as long as necessary. It should be noted that retention obligations apply equally to electronic and paper-based records.

Data Breach Management
Given the variety and volume of data processing within an organisation, it is inevitable that data may be lost or mislaid from time to time. This may occur if an unencrypted laptop containing the data is stolen, if forms are mislaid, or a report containing personal data is accidentally disclosed to unauthorised individuals. In the unfortunate event that data is lost or inadvertently disclosed, it is important that IGG’s Data Protection Officer at National Office is informed immediately and does everything possible to:

- discover what happened
- put a plan in place to prevent a recurrence
- ensure that the organisation’s Executive committee, Leaders, volunteers and staff are made aware of any resulting changes in procedure

IGG’s Data Protection Officer must notify the Office of the Data Protection Commissioner within 72 hours of becoming aware of the breach. However, if the device on which the data was stored is encrypted, there is no obligation to notify the Commissioner’s office, as the data is considered to be safe.

If there has been a breach in data protection or a concern with regards this, please contact IGG’s Data Protection Officer in National Office as soon as possible.

Data Destruction for Unit Level

<table>
<thead>
<tr>
<th>IGG Material</th>
<th>Time Period for Data Retention</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Registration Form</td>
<td>Keep for one year. New one should be completed each year. These must be stored securely.</td>
</tr>
<tr>
<td>Events</td>
<td>Attendance list should be archived after an event. If there was an accident, keep anything related. All other records such as consent forms, health forms: destroy after 3 months.</td>
</tr>
<tr>
<td>Financial Records &amp; Receipts</td>
<td>Keep for 7 years</td>
</tr>
<tr>
<td>C1, C4 forms</td>
<td>Keep for 1 year after the event to allow for reporting</td>
</tr>
<tr>
<td>Attendance Records/Roll Books</td>
<td>Keep for a minimum of 1 year</td>
</tr>
</tbody>
</table>
“TOGETHER MAY WE GIVE THE ROOTS TO GROW AND THE WINGS TO FLY”