



**CHILD
SAFEGUARDING
STATEMENT
COMPLIANCE
UNIT**

**CHILD SAFEGUARDING
STATEMENT SECTOR COMPLIANCE
REVIEW:
RESIDENTIAL SERVICES FOR
CHILDREN WITH DISABILITIES**

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Contents

Executive Summary	3
1.0 Introduction.....	4
2.0 Context.....	5
3.0 Purpose.....	5
4.0 Methodology	6
4.1. Selection of Relevant Services	6
4.2. Written Communication to Relevant Services.....	7
4.3. Sector Briefings	7
4.4. Formal requests for submissions of Child Safeguarding Statements (CSS)..	7
4.5. CSS Compliance Review & Support	7
5.0 Findings	8
6.0 Analysis	9
6.1. Risk Assessment	10
6.2. Safeguarding Procedures	11
6.3. Relevant Person Details	11
6.4. Nature of Service & Activities	12
6.5. Safeguarding Principles	12
6.6.CSS Commencement	12
6.7. Service Contact Details.....	12
6.8. Document Referencing	12
7.0 Recommendations	13
8.0 Conclusion.....	13
9.0 Appendices	13

Executive Summary

The Child Safeguarding Statement Compliance Unit (CSSCU) is the dedicated Unit within Tusla set up to ensure that all providers' Child Safeguarding Statements (CSS) are compliant with the requirements of the Children First Act 2015. The unit was established in March 2018 to provide both compliance support and enforcement. The CSSCU is responsible for the enforcement of section 11 of the Children First Act 2015 and maintaining the Public Register of Non-Compliance.

The Child Safeguarding Compliance Unit works on a referral basis. Referrals are received through voluntary submissions by providers, unsolicited information, implementation reviews and referrals by colleagues within Tusla. Where a service is found to be non-compliant with the requirement to have a compliant Child Safeguarding Statement, Tusla engages with the organisation, highlights the weakness in the statement, and affords them the opportunity to comply. Only when this avenue has been exhausted does the agency move to listing an organisation on the register of non-compliance (the final stage of enforcement)."

Under Section 11 of the Children First Act 2015, Tusla's statutory role is to ensure that each organisation who is required to do so, prepares a written statement (referred to as a "child safeguarding statement") specifying the service being provided and the child protection principles and procedures to be observed to ensure as far as practicable, that a child, while availing of the services, is safe from harm.

The Child Safeguarding Statement is underpinned by the required policies and procedures and implementation. The CSSCU does not have oversight of the policies and procedures, but it is expected that they would be in line with the Children First Guidelines 2017 and implemented consistently by the Relevant Service.

This report outlines the process of engagement with relevant disability services to children in residential care, the methodology utilised in a CSS sector Compliance Review, an overview and analysis of findings in relation to CSS compliance and recommendations to enhance Child Safeguarding Statement compliance within the sector.

The information and findings contribute to an improved understanding of CSS compliance within the disability sector and relevant services providing residential services to children with disabilities. The recommendations emerging from the sector compliance review aim to support relevant services in developing and reviewing Child Safeguarding Statements

Overall, the compliance review received positive engagement from relevant services within the sector selected as within remit of the project. The standard of Child Safeguarding Statements submitted by providers of residential services to children with disabilities were generally acceptable, but amendments were required in the majority. Much of the feedback provided to the services in respect of required improvements related to the services needing to provide more specific details in relation to the service provided or to expand on the information provided in the CSS. This is to ensure that the risk assessment is adequate to meet the service being provided. The CSSCU received a response from all services to formal requests to review Child Safeguarding Statements.

There are 5 recommendations

For the Child Safeguarding Statement Compliance Unit	
1.	Disseminate findings and recommendations of the CSS sector compliance review with services providing residential disability services to children through a sector briefing and report publication.
2.	Conduct a follow up CSS sector compliance review with the sector in three years to support continued CSS compliance with the requirements of Children First Act, 2015.

For Disability Services	
3.	Relevant persons in organisations to disseminate findings of the sector compliance review within services and consider recommendations when reviewing Child Safeguarding Statements as is required.
4.	Services to consider the commonly occurring areas of CSS noncompliance as outlined in the findings and analysis sections when developing or reviewing a CSS for a relevant service. Particular attention is advised in relation to developing the risk assessment, safeguarding procedures and relevant persons requirements.
5.	Services to liaise with information, advice, and training support services to strengthen the implementation of safeguarding policies and procedures specified in the Child Safeguarding Statement if required. E.g., HSE Children First Team or Tusla's Children First Information and Advice Service.

Acknowledgements

We would like to thank both the Health Service Executive Children First National Office, and the Health and Information Quality Authority (HIQA) for their support in this project.

1.0 Introduction

The CSSCU business plan of 2022 identified vulnerable populations groups as priority for ensuring that providers of relevant services to these groups are meeting their obligations to have CSSs in place. As part of this plan, the CSSCU proactively engaged with 137 services providing residential services to children with disabilities.

Residential disability services are relevant services under Schedule 1, section 1 (d) of the Children First Act, 2015 which refers to any work or activity which is carried out by a person, a necessary and regular part of which consists mainly of the person having access to, or contact with, children in— a designated centre within the meaning of section 2 of the Health Act 2007, in so far as it relates to an institution at which residential services are provided in accordance with the Child Care Act 1991 or to children with disabilities in relation to their disabilities.

The purpose of the engagement was to conduct a sectoral review of services to ensure that they had compliant Child Safeguarding Statements in place.

This report outlines the process of engagement with services, methodology utilised in the sector compliance review, an overview and analysis of findings in relation to CSS compliance and recommendations to enhance CSS compliance within the sector. The report is intended to contribute to an improved understanding of Child Safeguarding Statement (CSS) compliance within the residential disability sector. This compliance review was carried out in tandem with a review of the quality assurance measures put in place by the Children First Office of the HSE.

2.0 Context

A key strategic objective of the Child Safeguarding Statement Compliance Unit is to advance children's safety, development, and wellbeing by strengthening partnerships with providers of relevant services (as defined under schedule 1, Children First Act 2015).

A provider of a relevant service is any organisation where more than one person works with children in a voluntary or paid capacity. Key responsibilities of providers of relevant services are to keep children safe from harm; to assess risks of harm; to develop Child Safeguarding Statements; to have procedures in place to manage risks and to appoint a relevant person for the purpose of the CSS. All providers of relevant services are required to have a Child Safeguarding Statement in place.

The CSSCU prioritises engagement with providers of relevant services to particularly vulnerable children as they are more at risk of harm due to capacity to report or act self-protectively. Furthermore, children in residential care are highly dependent on their care givers as not in the immediate care of their families of origin. CSSCU identified children availing of residential services for children with disabilities as having a level of vulnerability that requires robust safeguarding statements, policies, and procedures to ensure that children are safe from harm while availing of the service. This led to the initiation of a sectoral compliance review project to proactively engage with residential service providers for children with disabilities during 2022.

Harm as defined in the Children First Act 2015, means 'in relation to a child—

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

3.0 Purpose

The purpose of this sectoral compliance review of Child Safeguarding Statements is to provide information, key learning, and support to the sector in relation to CSS compliance with requirements of Section 11 of the Children First Act, 2015 as the vulnerability and potential risk of harm to children while availing of these services is considered high.

This report is published on the TUSLA website and provides generalised information to parents, children, young people and service users in respect of the overall CSS compliance level within

a sector. This aims to contribute to a greater level of confidence by interested parties in the safety of services children are using.

4.0 Methodology

This report is based on data generated from formally requesting Child Safeguarding Statements from Disability Services registered with HIQA and in liaison with the HSE.

A process of engagement with relevant services within the sector began in May 2022 and concluded in December 2022. The process included the selection of services; written communication to services; sector briefings; formal requests for Child Safeguarding Statements (CSS); feedback on CSS compliance review and support to relevant services to achieve compliance with the requirements of the Children First act, 2015.

In parallel to this process, the CSSCU established a partnership agreement with the HSE Children First National Office (HSE CFNO) to support a pilot of the HSE's Children First Compliance Assurance Checks. In September 2022, the HSE's Children First Lead forwarded a sample of anonymised child safeguarding statements for review. The CSSCU reviewed statements using the units review outcome form and collated feedback on the sample review. This feedback was shared with the HSE CFNO who communicated to services involved in the pilot. The purpose of the parallel process with the HSE was to consider the standard of statements submitted by providers involved in the pilot and to identify compliance themes or trends emerging in child safeguarding statements. The process served to support the CSSCU and HSE in communicating a common understanding of CSS compliance to service providers. Additionally, it demonstrated that there is a clear need for a robust commonly understood risk framework and guidance in respect of this. This is a project priority for the CSSCU in the business plan for 2023.

4.1. Selection of Relevant Services

The CSSCU utilised the publicly available disability register of designated disability centres maintained by HIQA. HIQA is an independent authority that exists to improve health and social care services for the people of Ireland. The HIQA Disability Inspection Team are responsible for the monitoring, inspection, and registration of designated centres for adults and children with a disability and provide a disability register. CSSCU also collaborated with the HSE Children First Team and the HIQA Disability Inspection Team to identify and review accurate databases of relevant service details.

The HIQA register of disability services includes services that are registered to provide residential care to children and young people under the age of 18. Some services are registered to provide a care to both adults and children. Other services are registered to provide respite care to children or adults on alternate schedules or in tandem.

The CSSCU accessed the HIQA Disability Register database and reviewed the specific conditions of registration applying to each service. Services identified on the register as providing any (full-time or respite) services to children or persons 18 years and under were selected as being within remit of the CSSCU sector compliance review project.

4.2. Written Communication to Relevant Services

A written communication was issued to all relevant services selected as being within remit of the sector compliance review project to inform them of the project and the intention of CSSCU to engage with them in relation to Child Safeguarding Statement compliance. The communication invited services to an online briefing session.

Relevant services were advised that CSSCU always begin engagement from the perspective of supportive compliance and aims to support organisations to meet the requirements of Part 11 of the Children First Act 2015 to ensure all children availing of the service are safe from harm. However, the CSSCU also has enforcement responsibilities in relation to CSS compliance and may initiate escalation to enforcement procedures if required.

4.3. Sector Briefings

Two briefings were offered to the sector in July and August 2022, attended by 25 participants.

The briefings included the following.

- Introduction to the work of CSSCU.
- Outline of the purpose and context of the sector implementation review project with disability services.
- Details of the requirements of a Child Safeguarding Statement as outlined in the Children First Act 2015.
- Overview of the process involved in a formal request from CSSCU to submit a copy of a Child Safeguarding Statement for compliance review and feedback.
- CSS information and resources.

A [video link to the briefing is available](#) in Appendix 1: CSS information and resources.

4.4. Formal requests for submissions of Child Safeguarding Statements (CSS)

Letters formally requesting the relevant service to submit a copy of the providers Child Safeguarding Statement to the CSSCU for compliance review were issued to 137 services (see Appendix 2). The circulation of formal requests to services commenced in July 2022 and were issued to a schedule of services on a weekly basis to ensure that the unit could provide timely feedback on reviews.

4.5. CSS Compliance Review & Support

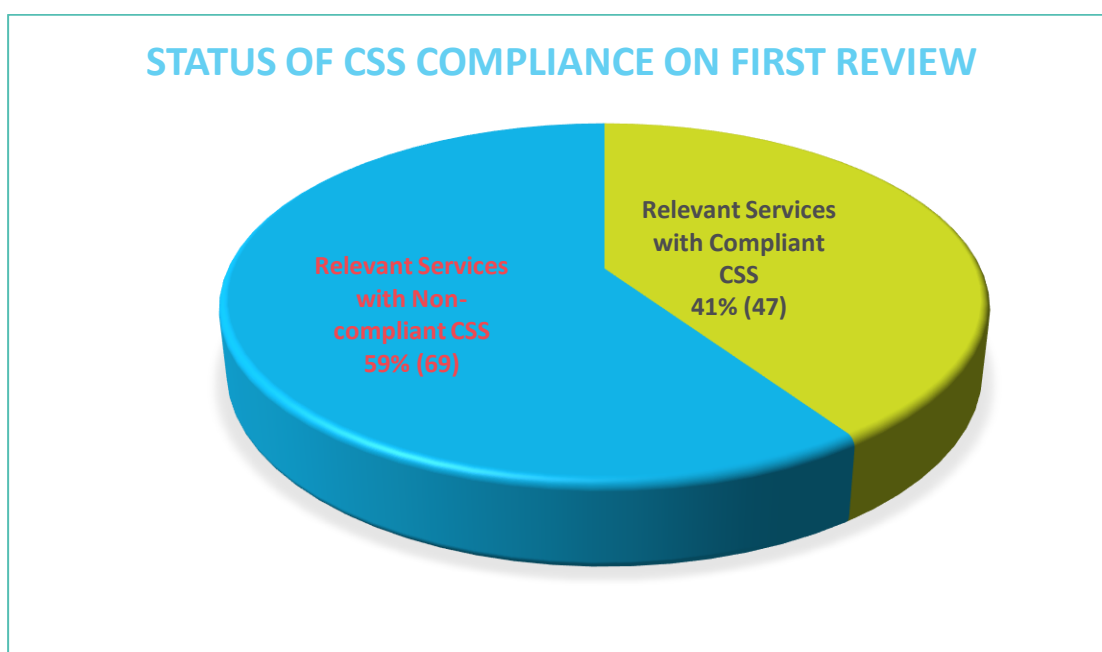
Upon receipt of a Child Safeguarding Statement, the CSSCU utilised a proforma assessment tool (see Appendix 3) to conduct a desktop review and to record areas of compliance or noncompliance within the CSS document. Feedback was issued to all relevant services on the outcome of the review. For those where amendments were required, CSSCU staff engaged with relevant services to support them in achieving compliance with the requirements of Section 11 of the Children First Act, 2015. Where appropriate subsequent review feedback was issued to relevant services.

5.0 Findings

Of the 137 relevant services who were formally requested to submit a Child Safeguarding Statement (CSS) to the CSSCU, 21 services had ceased to provide services to children and are not currently providing services to children and therefore are not required to have a CSS in place.

116 services provided a Child Safeguarding Statement for review. 99% of documents submitted were accepted as a valid Child Safeguarding Statement. 1 service was requested to review and amend document submission.

The status of Child Safeguarding Statement compliance on first review indicated that 41% of CSSs were compliant. 59% were non-compliant on first review and required support in updating the CSS to achieve compliance.



Areas of non-compliance identified with 69 relevant services during the sector implementation review are outlined in the table below.

Description of Non-Compliance	Number of services applicable ¹
Document not referenced/titled Child Safeguarding Statement.	2
Insufficient detail of the nature of the service or activities provided in CSS.	19

¹ Each service may have had more than one area of non-compliance and so this table is not cumulative

Insufficient detail on principles to safeguard children from harm in CSS.	12
No risk assessment included in CSS.	30
Risk assessment included in CSS did not adequately reflect the service being provided nor the risk posed to children and required more detail.	14
A risk description recorded in the CSS did not specify the risk of harm to a child.	5
A risk specified in the CSS not relevant to the service.	1
Insufficient detail on CSS that the procedures as specified in s.11(3), Children First Act 2015 are in place. <i>*Two procedures most omitted were the procedure for appointing a relevant person and the procedure for maintaining a list of mandated persons.</i>	35
No date for adoption or review of CSS included.	7
Insufficient detail provided in relation to the relevant person for the CSS	25
Name or address of service not provided on CSS.	6

The most frequent recurring areas of noncompliance were in relation to risk assessment, safeguarding procedures and relevant persons.

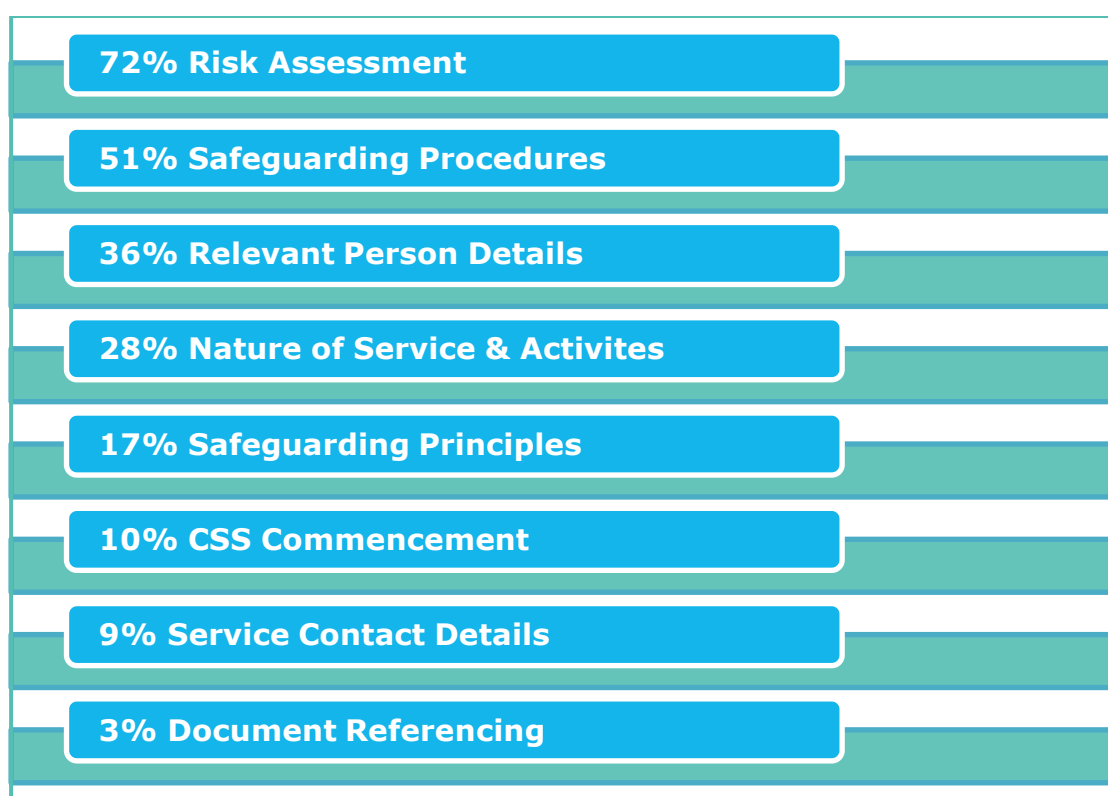
Enforcement action was commenced with 18 services (16%). The reasons for enforcement action were due to a lack of response to the formal request for CSS with six services and no response to feedback issued on CSS non-compliance requiring resubmission with twelve services. No service has been added to the public register of non-compliance as all services have achieved compliance by the conclusion of this project.

6.0 Analysis

Overall, the sector compliance review received positive engagement from relevant services selected as within remit of the project. The standard of Child Safeguarding Statements submitted by providers of residential services to children with disabilities were generally of a reasonable standard but with amendments required in the majority. Amendments required were primarily to provide more specific details or to expand on the information already provided within the CSS document. The CSSCU received a response from all services to the formal requests to review Child Safeguarding Statements.

A non-compliant Child Safeguarding Statement (CSS) can impact the safety of children while availing of a residential service for children with disabilities. Without a clear commitment to keeping children safe from harm, a risk assessment and appropriate procedures in place, lack of clarity may arise within a service causing confusion for staff in respect of how to respond to any child welfare or protection concern. Therefore, a compliant Child Safeguarding Statement must reflect the specific service being provided and set out clear principles of safeguarding. It must identify possible risks of harm to a child as defined in the Children First Act, 2015 and the procedures in place to mitigate against those risks. These risks should correlate with the service being provided to demonstrate robust analysis of any potential harm that a child may experience in that specific service. The CSS must state that specified safeguarding procedures are in place and implemented. Service contact details, plans for CSS review and details of the relevant person must be clearly provided on the CSS. All information provided within the CSS must be assessable to service users, children, parents, and members of the public.

Analysis of the findings in section six identified a pattern of frequency of noncompliance in relation to the statements of 67 residential disability services involved in the sector compliance review. The list below outlines the percentage of relevant services deemed non-compliant on first review that were required to make amendments in particular areas within the CSS to achieve compliance.



6.1.Risk Assessment

72% of services with a noncompliant CSS required amendments in relation to the risk assessment.

If potential risks of harm are omitted from a CSS, there can be limited awareness or understanding amongst personnel (staff/volunteers) that a particular risk may occur. The identification of a particular risk also prompts the development and implementation of appropriate safeguarding procedures to mitigate against the risk and to ensure that children availing of the service are safe from harm.

6.2.Safeguarding Procedures

51% of services with a noncompliant CSS required amendments in relation to six safeguarding procedures as specified in s.11(3), Children First Act 2015. Two procedures most omitted were the procedure for appointing a relevant person and the procedure for maintaining a list of mandated persons.

The Children First Act, 2015 specifies that the following procedures must be both referenced in a Child Safeguarding Statement as being in place and implemented in practice within the service. These documents were not requested as part of this project and services self-declared that they were in place. The CSSCU does not have powers to formally request these documents or review them for compliance with the National Guidance of Children First 2017.

1. "[Procedure] for reporting to [Tusla] by the provider or a member of staff of the provider (whether a mandated person or otherwise) in accordance with this Act or the [Children First] guidelines issued by the Minister under section 6" i.e. A reporting procedure.
2. "[Procedure] in respect of any member of staff who is the subject of any investigation (howsoever described) in respect of any act, omission or circumstance in respect of a child availing of the relevant service" i.e. A procedure for managing allegations of abuse against staff.
3. Procedure for selection or recruitment of any person as a member of staff of the provider with regard to that person's suitability to work with children.
4. Procedure for the provision of information and, where necessary, instruction and training to members of staff of the provider in relation to the identification of the occurrence of harm.
5. Procedure for maintaining a list of the persons (if any) in the relevant service who are mandated persons.
6. Procedure for appointing a relevant person for the purposes of the [Statement].

Having these procedures in place supports services in reducing risks of harm to children and to respond appropriately if an incident occurs and is a statutory requirement.

6.3. Relevant Person Details

36% of services with a noncompliant CSS required amendments to the information provided in relation to the relevant person in the CSS.

A relevant person is appointed for the purpose of being the first point of contact in relation to the Child Safeguarding Statement. Having the name and contact details clearly identified on the CSS assists the relevant service in being assessable to children, parents or members of the public who may have a query or concern related to the Child Safeguarding Statement. When the relevant person is not clearly identified with contact details on the publicly displayed

CSS it can make it difficult for an agency, parent, or member of the public to request further information about the CSS.

6.4. Nature of Service & Activities

28% of services with a noncompliant CSS required amendments to provide more detail in relation to the nature of the service or activities provided in the CSS.

A comprehensive description of the nature of the services and activities being provided allows the relevant service to consider all possible risks of harm to a child while availing of a service.

6.5. Safeguarding Principles

17% of services with a noncompliant CSS required amendments to provide more detail on principles to safeguard children from harm in the CSS.

A description of the services commitment to safeguarding principles supports the relevant service in communicating to children, parents, and members of the public that the responsibly to safeguard children while availing of the service is a priority and taken seriously.

6.6. CSS Commencement

10% of services with a noncompliant CSS required amendments to include details in relation to CSS implementation such as a date for adoption or review of the CSS.

All relevant services as specified in schedule 1 of the Children First Act, 2015 are required to have an adopted CSS in place. It is also a requirement that a CSS is reviewed at least every two years or as soon as there is a material change to the service being provided. Therefore, all CSSs must be up to date and appropriate for the service currently being provided.

6.7. Service Contact Details

9% of services with a noncompliant CSS required amendments to include the name or address of the service provided on the CSS.

6.8. Document Referencing

3% of services with a noncompliant CSS required amendments to the title of the CSS document to include reference to Child Safeguarding Statement.

The CSS document must be clearly referenced and displayed as a Child Safeguarding Statement so that children, parents, and members of the public can access information about the relevant services commitment to safeguarding children and the procedures that the service has in place to mitigate against risks of harm while availing of the service.

7.0 Recommendations

To continue to strengthen the safeguarding of children in residential services for children with disabilities there are five core recommendations.

For the Child Safeguarding Statement Compliance Unit

1.	Disseminate findings and recommendations of the CSS sector compliance review with services providing residential disability services to children through a sector briefing and report publication.
2.	Conduct a follow up CSS sector compliance review with the sector in three years to support continued CSS compliance with the requirements of Children First Act, 2015.

For Disability Services

3.	Relevant persons in organisations to disseminate findings of the sector compliance review within services and consider recommendations in review of Child Safeguarding Statements as is required
4.	Services to consider the commonly occurring areas of CSS noncompliance as outlined in the findings and analysis sections of this report when developing or reviewing their CSS. Particular attention advised in relation to risk assessment, safeguarding procedures and relevant persons.
5.	Services to liaise with information, advice, and training support services to strengthen the implementation of safeguarding policies and procedures specified in the Child Safeguarding Statement if required. E.g., HSE Children First Team or Tusla's Children First Information and Advice Service.

8.0 Conclusion

This report outlines the process of engagement with relevant services, the methodology utilised in a CSS sector compliance review, an overview and analysis of findings in relation to CSS compliance and recommendations to enhance Child Safeguarding Statement compliance within the sector. The information contributes to an improved understanding of CSS compliance within the disability sector and relevant services providing residential services to children with disabilities. The recommendations emerging from the implementation review aim to support relevant services in developing and reviewing Child Safeguarding Statements.

9.0 Appendices

Appendix 1: CSS Information & Resources

Appendix 2: Letter formally requesting Child Safeguarding Statement (CSS)

Appendix 3: CSSCU Review Outcome Form

Appendix 1: CSS Information & Resources

Tusla has published advice and guidance and a sample template to assist providers in developing a Child Safeguarding Statement which are available on the Tusla website or through the links below: <https://www.tusla.ie/children-first/organisations/what-is-a-child-safeguarding-statement/how-do-i-develop-a-child-safeguarding-statement/>

- Video: CSSCU Briefing to Disability Service Providers August 2022
<https://www.youtube.com/watch?v=OpO9Rc5fdiU>
- Video: What is a Child Safeguarding Statement
<https://youtu.be/sQPXEnHYq4Q>
- Guidance on Developing a Child Safeguarding Statement
https://www.tusla.ie/uploads/content/4214TUSLA_Guidance_on_Developing_a_CSS_LR.PDF
- Template to develop a CSS <https://www.tusla.ie/children-first/organisations/what-is-a-child-safeguarding-statement/how-do-i-develop-a-child-safeguarding-statement/>
- CSSCU Review Outcome Form
https://www.tusla.ie/uploads/content/CROF_CSSCU_005_web.pdf
- Video: Understanding Risk Assessments in Child Safeguarding Statements
<https://www.youtube.com/watch?v=0SkqtPFZQUY>
- Child Safeguarding: A Guide for Policy, Procedure and Practice
https://www.tusla.ie/uploads/content/Tusla_-_Child_Safeguarding_-_A_Guide_for_Policy,_Procedure_and_Practice.pdf

Appendix 2: Letter formally requesting Child Safeguarding Statement (CSS)

Estuary House,
Henry Street,
Limerick.
V94 XT5F
csscu@tusla.ie

0000/2022

Re: Child Safeguarding Statement Compliance Unit (CSSCU) Engagement with Providers of Relevant Services to Children with Disabilities.

Your Unique CSSCU Reference : «**CSSCU_Case_ID**»

NB : Please quote this reference when communicating with the CSSCU

Dear Sir/Madam,

In June of this year, we wrote to you to advise of our intention to engage with organisations providing services to with disabilities and our intention to formally request a copy of your organisation's child safeguarding statement.

As you are aware the CSSCU is the dedicated Unit set up in Tusla to ensure that all providers' Child Safeguarding Statements are compliant with the requirements of parts 10 – 13 of the Children First Act 2015. The unit was established in March 2018 to provide both compliance support and enforcement.

We are now formally requesting, under Section 5(b)(ii) of the Children First Act 2015, that you submit a copy of your Child Safeguarding Statement within 10 days of the date on this letter. Failure to do so may result in a further escalation of this matter and possible enforcement action as per the Children First Act 2015.

Tusla has published advice and guidance and a sample template to assist providers in developing a Child Safeguarding Statement which are available on the Tusla website or through the links below: <https://www.tusla.ie/children-first/organisations/what-is-a-child-safeguarding-statement/how-do-i-develop-a-child-safeguarding-statement/>

- Video: CSSCU Briefing to Disability Service Providers August 2022
<https://www.youtube.com/watch?v=OpO9Rc5fdiU>
- Video: What is a Child Safeguarding Statement
<https://youtu.be/sQPXEnHYq4Q>
- Guidance on Developing a Child Safeguarding Statement
https://www.tusla.ie/uploads/content/4214TUSLA_Guidance_on_Developing_a_CSS_LR.PDF

- Template to develop a CSS <https://www.tusla.ie/children-first/organisations/what-is-a-child-safeguarding-statement/how-do-i-develop-a-child-safeguarding-statement/>
- CSSCU Review Outcome Form
https://www.tusla.ie/uploads/content/CROF_CSSCU_005_web.pdf
- Video: Understanding Risk Assessments in Child Safeguarding Statements
<https://www.youtube.com/watch?v=0SkqtPFZQUY>
- Child Safeguarding: A Guide for Policy, Procedure and Practice
https://www.tusla.ie/uploads/content/Tusla_-_Child_Safeguarding_-_A_Guide_for_Policy,_Procedure_and_Practice.pdf

If you require any further information or clarification, please contact the CSSCU by phone (061461738) or email (csscu@tusla.ie).

We look forward to supporting your organisation in relation to Child Safeguarding Statement compliance.

Yours sincerely,

Maria McGloughlin
Senior Registration & Enforcement
Officer
CSSCU



Appendix 3: CSSCU Review Outcome Form

Date of Review by CSSCU	Click or tap to enter a date.
Name of CSSCU Staff Member undertaking review	
Reason for Review (Provided Voluntarily / Resubmission as change to CSS/ Requested by CSSCU following UI/ Implementation Review/Referred by other Internal Dept.)	Choose an item.
Review Number (First / Second etc)	1 st
Case ID	

Organisation Name	
Setting (e.g. Sports Club; Educational Setting)	
Affiliated Organisation	
Funding Body (If available)	
Relevant Person Name	
Overall Purpose and Function	

PART 1: REVIEW OF CHILD SAFEGUARDING STATEMENT FOR COMPLIANCE WITH THE CHILDREN FIRST ACT 2015				
No.	Checklist Review Lines of Investigation	Yes (✓)	No (✓)	Rationale (If "No" only)
1.	Is the CSS titled correctly? (Must be titled Child Safeguarding Statement)	<input type="checkbox"/>	<input type="checkbox"/>	
2.	Does the CSS include the name of the service to which the CSS refers?	<input type="checkbox"/>	<input type="checkbox"/>	
3.	Are there clear Principles and evidence of a commitment to safeguard children from harm (i.e., how they intend to safeguard children)?	<input type="checkbox"/>	<input type="checkbox"/>	
4.	Has the service provider specified the service being provided? (If more clarity needed, choose "No")	<input type="checkbox"/>	<input type="checkbox"/>	
5.	Does the Statement include that a risk assessment has been completed to identify any potential for harm (as defined in the Act) to a child while availing of their services?	<input type="checkbox"/>	<input type="checkbox"/>	
6.	Are the risks identified sufficient, relevant, and realistic, based on the nature of the service? (If there are obvious gaps in risk identification, choose "No")	<input type="checkbox"/>	<input type="checkbox"/>	
7.	Are the procedures in place to manage the risks identified, specified in the statement?	<input type="checkbox"/>	<input type="checkbox"/>	

8.	Are the procedures below (s.11(3), Children First Act 2015) specified as being in place? <ul style="list-style-type: none"> "[Procedure] for reporting to [Tusla] by the provider or a member of staff of the provider (whether a mandated person or otherwise) in accordance with this Act or the [Children First] guidelines issued by the Minister under section 6" i.e. A reporting procedure. "[Procedure] in respect of any member of staff who is the subject of any investigation (howsoever described) in respect of any act, omission or circumstance in respect of a child availing of the relevant service" i.e. A procedure for managing allegations of abuse against staff. Procedure for selection or recruitment of any person as a member of staff of the provider with regard to that person's suitability to work with children. Procedure for the provision of information and, where necessary, instruction and training to members of staff of the provider in relation to the identification of the occurrence of harm. Procedure for maintaining a list of the persons (if any) in the relevant service who are mandated persons. Procedure for appointing a relevant person for the purposes of the [Statement]. 	<input type="checkbox"/>	<input type="checkbox"/>	
9.	Is there either a date for adoption or review of the CSS? (Either is acceptable)	<input type="checkbox"/>	<input type="checkbox"/>	
10.	Is the relevant person clearly identified and their name and contact details provided in the CSS?	<input type="checkbox"/>	<input type="checkbox"/>	
PART 1 TOTAL SCORES (No. of Yes / No results out of a possible 15)		/15	/15	

PART 2: Suggested and recommended amendments that would improve the quality of the CSS				
No.	Checklist for improved quality	Yes (✓)	No (✓)	Rationale (If "No" only)
11.	Does the Child Safeguarding Statement include the definition of harm as set out in the Children First Act 2015?	<input type="checkbox"/>	<input type="checkbox"/>	
12.	Is the name and address of the provider included?	<input type="checkbox"/>	<input type="checkbox"/>	
13.	Does the Child Safeguarding Statement set out a commitment that all children will be equally protected from harm regardless of race, ability, ethnicity, or sexual orientation?	<input type="checkbox"/>	<input type="checkbox"/>	

TOTAL NUMBER OF YES ANSWERS (Out of a Possible 16)

/15

Score (Out of 11)	Outcome
15/15 (100%)	Compliant
< 15	Non-Compliant

Date of Review	REVIEW OF STATEMENT: COMPLIANCE OUTCOME	Signature

Guidance Notes

This review tool is used by Tusla's Child Safeguarding Statement Compliance Unit (CSSCU) when reviewing child safeguarding statements (CSS) which have been provided to the CSSCU, either voluntarily or in response to a request from the CSSCU. Providers of relevant services, under the Children First Act 2015, are required to prepare a CSS. Tusla has published [general guidance to assist providers](#) in writing their CSS, as well as a [CSS Sample Template](#). Tusla has also worked with a number of service sectors and government departments to assist them in developing tailored templates for particular contexts.

It may be helpful to providers of relevant services, when either developing or reviewing their CSS, to refer to the CSSCU Review Outcome Form to assist them to assess their compliance with the safeguarding requirements set out in the Children First Act 2015.

Specific Guidance for Reviewers:

- **Affiliate Organisation** – this applies when a provider is a member of a larger umbrella body. This could include registering bodies such as HIQA, or membership organisations such as National Youth Council of Ireland, Sport Ireland, a National Governing Body of Sport, etc.
- **Overall Purpose and Function** – should be copied from the CSS section on service provided.

Part 1 Guidance:

- **CSS Title** – All CSS must be titled **Child Safeguarding Statement**.
- **Principles** – The CSS must include principles to keep children safe from harm, such as the right to be consulted, the right to protection, and adherence to inclusion/anti-discriminatory practice.
- **Service being provided** – the CSS must outline the service provided to children by the service provider.
- **Risk assessment** – the risks identified must be specific to the services provided, listed in the previous section. They must relate to the protection of the child/children from harm, as defined in the Children First Act 2015. Services can include an abridged list of the main risks identified and develop a more detailed secondary risk assessment document. Where a secondary risk assessment document is developed, this must be noted on the CSS and provided with the CSS whenever the CSS is requested.
- **Risks sufficient, relevant and realistic** – while a reviewing officer is not expected to know the nuances of every service whose CSS is being reviewed, there are certain general risks which it is reasonable to expect would be in place in most services. These include
 - Risk of harm (as defined in the Children First Act 2015) of a child by a member of staff/volunteer from things they have done (e.g. hurt a child) or failed to do (e.g. not report a concern);
 - Risk of harm (as defined in the Children First Act 2015) caused by lack of supervision;
 - Risk of harm (as defined in the Children First Act 2015) by a visitor to the service (workers, parents, placements, etc.);
 - Risk of harm (as defined in the Children First Act 2015) by another child in the service;
 - Risk of harm (as defined in the Children First Act 2015) of a child on outings by a member of staff/volunteer/stranger/peer;
 - Risk of harm (as defined in the Children First Act 2015) through access to ICT / unauthorised photography (e.g., social media or web access, electronic contact, etc).

This is not a comprehensive or definitive list. Reviewers are expected to use their discretion and professional judgement when assessing risk assessments for compliance with the requirements of the Act. Service providers are responsible for carrying out a comprehensive assessment of the risk of harm to children while availing of their service.

- **Specified procedures – all six specified procedures must be included in the CSS. It is not a requirement that they are listed separately to the risk assessment. It is not a requirement that the titles are verbatim as they are presented in the Act (e.g., Recruitment and selection procedures or reporting procedure for child protection or welfare concerns would both be acceptable).**
- **Date for review – the CSS must specify either the date it was introduced/ratified or the proposed date for review. Either are acceptable.**
- **Name and address of the provider – this information must be included as the Act places numerous responsibilities associated with the CSS directly on the Provider. For services operating at multiple sites, if they are using a single corporate CSS, address of provider can be head office.**
- **Name and contact details for Designated Person – this information must be included, as well as a clear designation that the person named is the designated person.**
- **It is not a requirement that the CSS is signed by the provider**
- **CSS submitted should be final versions.**

Where the CSSCU reviews a CSS, all requisite components must be present and in line with the guidance to be deemed compliant.

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