



**CHILD
SAFEGUARDING
STATEMENT
COMPLIANCE
UNIT**

CHILD SAFEGUARDING STATEMENTS: PARENTS SURVEY NOVEMBER 2022

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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 as required by Section 13 (1) of the Act.

This report is based on a brief baseline survey undertaken by the CSSCU in conjunction with the National Parent's Council to establish the experience and understanding that parents have in respect of Child Safeguarding Statements. The survey contained both closed and open-ended questions, allowing for quantitative and qualitative data to be collated. It set out at the beginning of the survey the contexts where Child Safeguarding Statements are required. Information was also provided in respect of the definition of harm and links provided to both legislation and online information about Child Safeguarding Statements.

The data gathered indicates that parents are aware of the necessity of organisations to have Child Safeguarding Statements in place. However, parents are not routinely observing statements or being provided them by organisations. This influences the capacity of parents to understand the intent of the CSS as a useful and purposeful document to inform their understanding of safeguarding within an organisation.

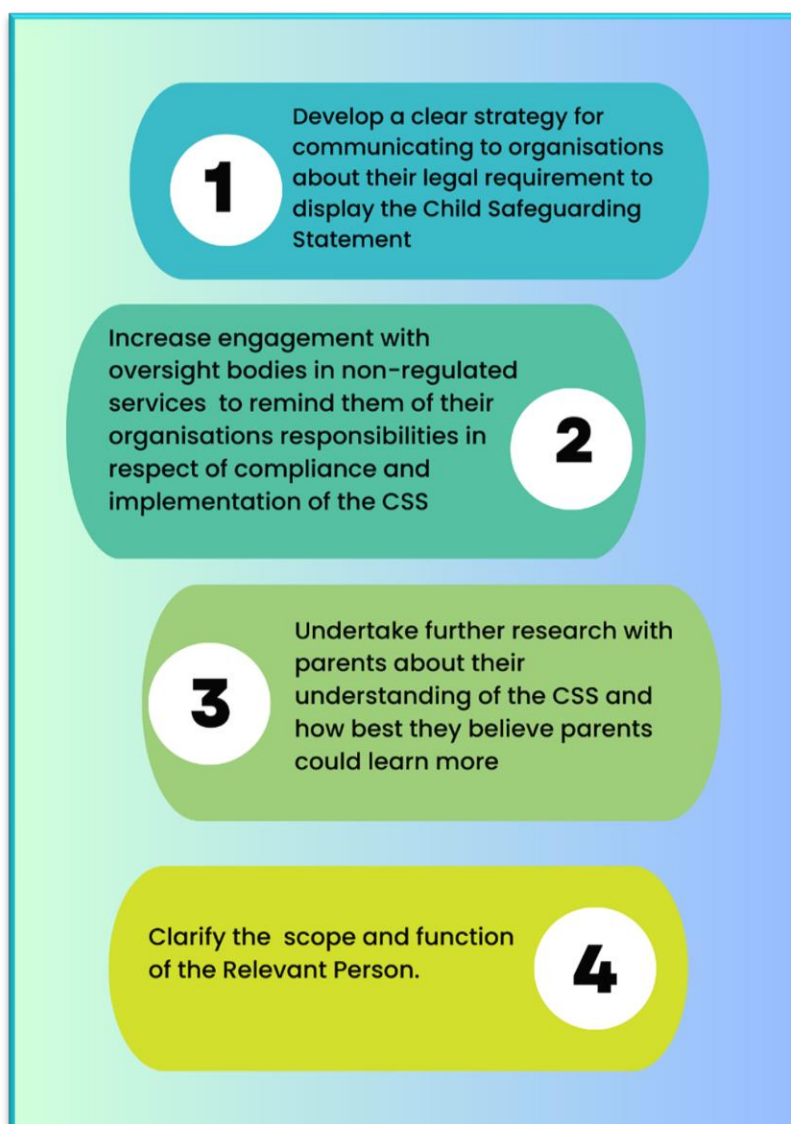
Parents are positively disposed towards the concepts of collective responsibility for safeguarding children, but in the absence of consistent display or sharing of the statement it is difficult for parents to have more than a cursory understanding of the scope of the Child Safeguarding Statement in keeping their children safe.

Overall parents stated they have a good understanding of the requirement for services to have Child Safeguarding Statements. However, there is a gap in respect of the sharing of the statement by services reported by parents. Inadequate implementation of the statutory requirements for communicating and displaying Child Safeguarding Statements appears to be the strongest finding emerging from the survey. This suggests that greater efforts are required to communicate the requirement of services to publicly display the Child Safeguarding Statement and ensure that parents are also fully informed of this legal requirement.

Parents are aware of the need for organisations to have strategies in place to keep children safe but it's not always clear to how parents how they can access this information.

This brief survey has provided important information to inform further development and approaches taken by the Child Safeguarding Statement Compliance Unit.

There are 4 recommendations arising from the review of this data for the Child Safeguarding Statement Compliance Unit



Acknowledgements

The CSSCU would like to thank the National Parents Council for their support, guidance and partnership in respect of this project.

1. Introduction

Tusla Corporate Plan aims to 'Advance children's safety, development, and wellbeing by strengthening partnership and communication with stakeholders.' The purpose of the Child Safeguarding Statement (CSS) is to provide a scaffold of assurance to parents, children, young people and the wider community that children are provided with care support and guidance in a safe environment. The Child Safeguarding

Statement Compliance Unit (CSSCU) is a unit within TUSLA that has the statutory responsibility for ensuring that Relevant Services are compliant with their requirements to have a Child Safeguarding Statement under the 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.

A CSS is a written statement that Relevant Services for children are mandated to develop. The statement specifies the service being provided and the principles and procedures to be observed to ensure, as far as practicable, that a child availing of the service is safe from harm. It must set out any potential risk of "harm" to a child that have been identified in the risk assessment, and procedures in place to reduce the identified risks, as specified in section 11 (3) of the Children First Act 2015. The definition of harm is defined under Section 2 of the Act.

Creating environments that are explicitly committed to the safeguarding of children is vital to ensuring that harm of children is not facilitated. Children historically have been harmed in contexts where consideration was not given to the possibility that they could be. Trust was afforded to people by virtue of their rank, position and authority and there was limited accountability and assurance models to demonstrate that this trust was warranted. The overarching purpose of a Child Safeguarding Statement is to set out the framework, and intention, of organisations that provide services to children, to ensure that those using the services will be protected in so far as possible. Organisations are required to assess risk in the context of the services and activities they provide. By assessing the risk of harm services are actively and ongoingly engaging in the possibility that harm could occur, thereby reducing the risk that an assumption of safety will be made.

The National Parents Council Primary (NPC) is the only representative organisation for parents of children in primary or early education in Ireland. NPC supports parents to support their children throughout their early and primary school years. NPC strongly believes that children should also have their say in issues that affect their educational lives. The survey was co-developed by both organisations, to gain an understanding from parents, engaged with the National Parent's Council, about their understanding of the role that the Child Safeguarding Statement plays in providing assurances that children are safe when they are not in the immediate care of their parents. The survey was platformed on Survey Monkey and disseminated to all members of the National Parent's Council through their email list-serve.

2. Context

The Children First Act 2015 was enacted on 19th November 2015 and commenced in full on December 11th, 2017.

The Act places a number of statutory obligations on specific groups of professionals and on particular organisations providing services to children.

The intentions of the Act are as follows:

- Raise awareness of child abuse and neglect.
- Provide for mandatory reporting by key professionals.
- Improve child safeguarding arrangements in organisations providing services to children.
- Provide for cooperation and information-sharing between agencies when Tusla – Child and Family Agency, is undertaking child protection assessments or interventions.
- Create an interdepartmental response to Child abuse and neglect.

More specifically the Act requires that providers of a Relevant Services develop Child Safeguarding Statements that set out the commitment that organisations make to ensure that children using their services are safe in so far as possible, risks are identified, and appropriate responses are put in place to mitigate these risks. A 'Relevant Service' means any work or activity as set out in Schedule 1 of the Act. A "provider" means, in relation to a relevant service, a person—

- (a) who provides a relevant service, and
- (b) who, in respect of the provision of such relevant service—
 - (i) employs (whether under contract of employment or otherwise) one or more than one other person to undertake any work or activity that constitutes a relevant service,
 - (ii) enters into a contract for services with one or more than one other person for the provision by the person of a relevant service, or
 - (iii) permits one or more than one other person (whether or not for commercial or other consideration and whether or not as part of a course of education or training, including an internship scheme) to undertake any work or activity, on behalf of the person, that constitutes a relevant service.

The Child Safeguarding Statement Compliance Unit (CSSCU) is a unit within the Children's Services Regulation Division of Tusla that has the statutory responsibilities for ensuring that Relevant Services are compliant with the specifics of the Act that require them to have Child Safeguarding Statement (CSS). The CSSCU takes a supportive compliance approach to regulation of Relevant Services required to have CSS in place. In order to inform this approach gaining an understanding of the needs of communities of service users is fundamental.

The CSSCU provides a high level of support, guidance and information to organisation through a multitude of mechanisms. The CSSCU has dedicated information available on the website and regularly provides briefings to sectoral groups and organisations. Additionally, the CSSCU welcomes organisations to submit their CSS for review on a voluntary basis. Where there is a triggered request for a CSS the unit signposts organisations with information in how to achieve compliance and provides very detailed feedback in areas for improvement. A triggered request may be in response

to any information that relates to a possible non-compliance in respect of either the display, content or implementation of the Child Safeguarding Statement.

Enforcement actions are taken only in the absence of engagement or where there are significant issues that become intractable. The proof of the effectiveness of this approach is in that in the time period between 2020 and 2022 there have been no services added to the Public Register of services that are non-compliant.

3. Purpose of consultation

By consulting with parents, the CSSCU aims to gain an understanding of the real-world insight that parents have in respect of Child Safeguarding Statements. By gaining a better understanding of how parents experience, and use, Child Safeguarding Statements, the Unit will have a better-informed approach to how best to develop and improve communication strategies and implementation reviews. Additionally, the purpose of this survey, was to establish a baseline, where the Unit has been in operation since 2018, of how the awareness of Child Safeguarding Statements has been internalised by parents. This will then assist with the strategy that Child Safeguarding Statement Compliance Unit will engage to ensure that services are implementing the requirements of the Children First Act.

4. Methodology

Engagement with the National Parent's Council was based on the contact and influence of the organisation with a wide spectrum of parents.

The survey contained both closed and open-ended questions, allowing for quantitative and qualitative data to be collated. It set out at the beginning of the survey the contexts where child safeguarding statements are required. Information was also provided in respect of the definition of harm and links provided to both legislation and online information about child safeguarding statements. A link to the survey has been provided in Appendix 1 of this report.

The survey was circulated to National Parents Council Members from the 7th to the 14th of November 2023 with an additional reminder sent on the 11th of November. 11,000 members of the National Parents Council received a link via email to the survey and 543 responses were received representing almost 5% of the overall population surveyed.

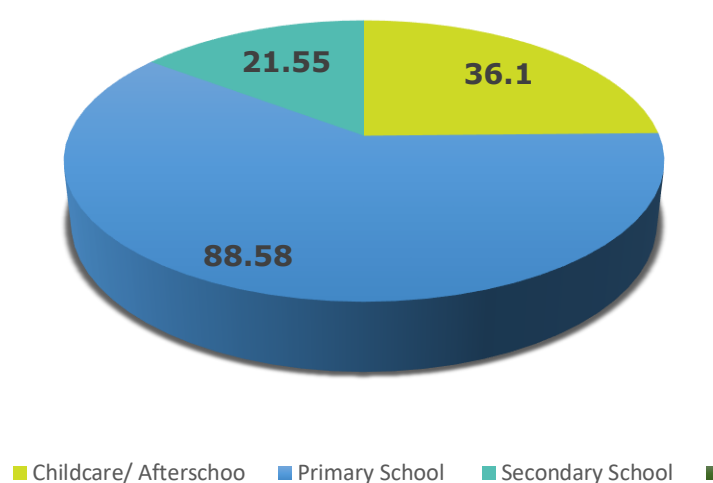
5. Quantitative Findings

The participants were asked five specific closed ended questions. These question and responses are set out below:

Question 1: Does your child go to any of the following? (Select all that apply)

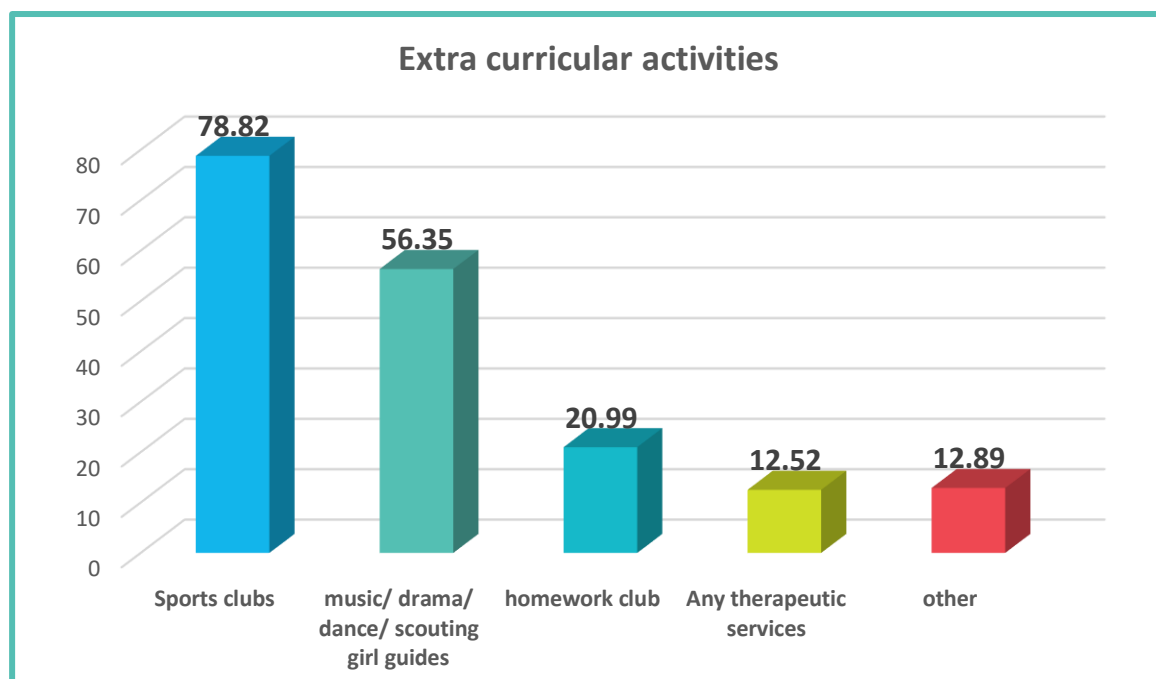
Childcare / Afterschool	36.10%	196
Primary school	88.58%	481
Secondary school	21.55%	117

Does your child go to any of the following?



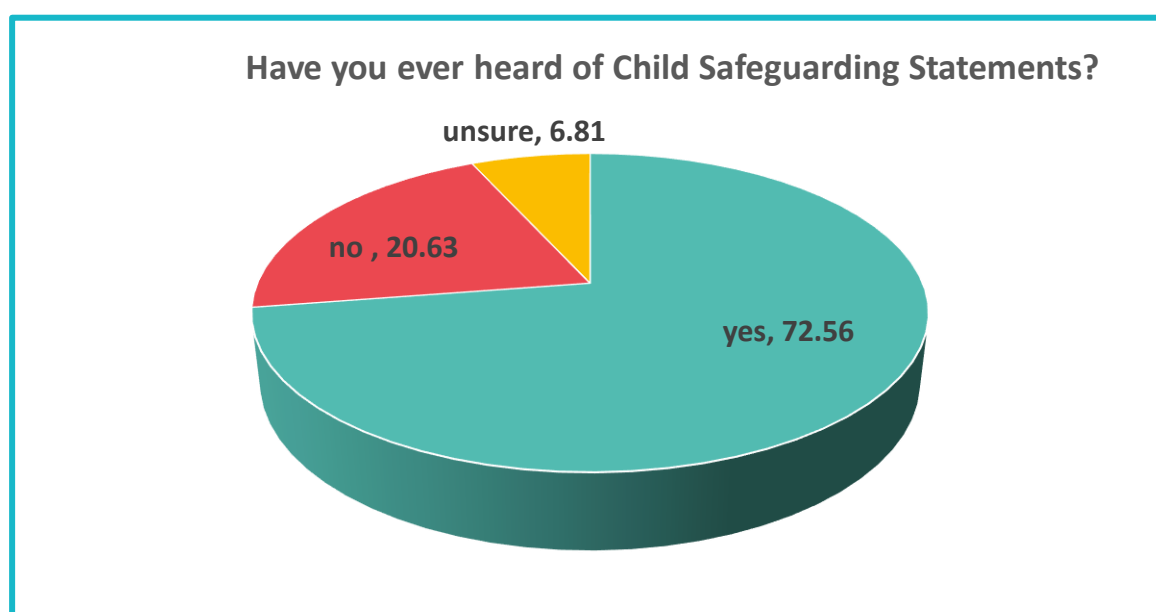
Most participants advised that their children attended Primary School (88.58%). 36.1% of respondents had children in Early Years/ Afterschool project and 21.55% were parents of children attending Secondary School. The CSO reports that in 2021 there were 561,411 children in primary education and 405,003 in secondary school. The response rate of the parents of children in primary school is therefore more significant and perhaps indicative that parents of primary aged children are more significantly involved in their children's life and also that children in this cohort are perceived to be more vulnerable.

Question 2: Does your child attend any clubs or activities outside of the home? (select all that apply)



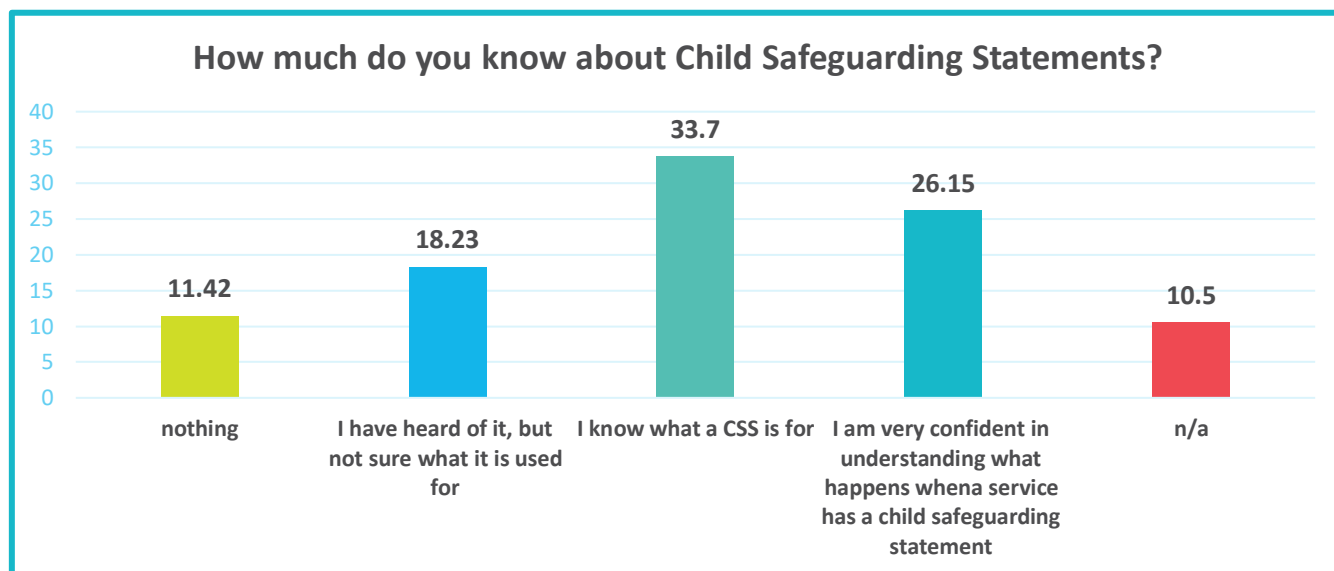
Participants were asked in respect of extracurricular activity. 78.82% of parents indicated that their children were involved in sports clubs. 56.35% of parents indicated that their children participated in music/ drama/ dance/ scouting/ girl guides; 20.99% of parents indicated their children were involved with homework clubs/ school buses and 12.52% of parents indicated their children were beneficiaries of therapeutic services. This is useful to give context for the information provided, because this demonstrates that parents who engaged in this survey have experience where their children have been participants in wide ranges of activities.

Question 3 Have you ever heard of Child Safeguarding Statements?



A high number of parents had indicated that they were aware of Child Safeguarding Statements, and this is positive indication of the message that Relevant Services are required to have Child Safeguarding Statements has been heard and taken on board by parents.

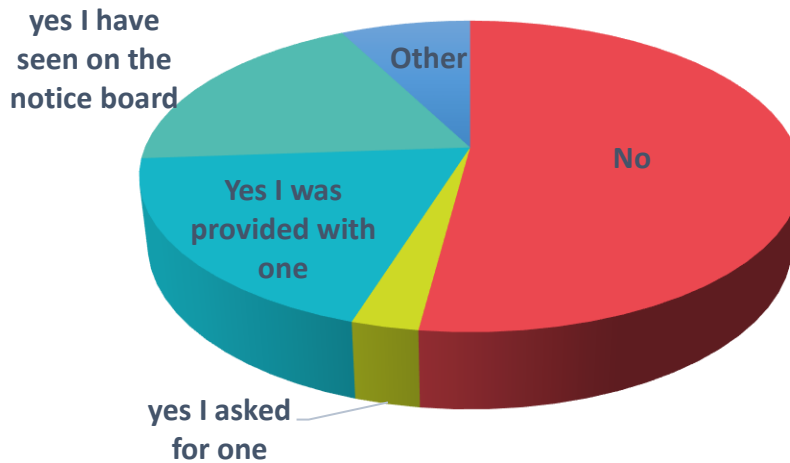
Question 4: If yes - How much do you know about Child Safeguarding Statements?



Whilst a high number of parents had indicated that they were aware of Child Safeguarding Statements, it is concerning that over 50% (50.15%) of parents indicated either they did not know anything about Child Safeguarding Statements or that they had indicated that they had not heard of Child Safeguarding Statements. The Children First Act 2015 has been enacted since 2017 and whilst parents are aware of the need for organisations to have Child Safeguarding Statements the responses to this question would suggest that awareness that parents have in respect of the Children First Act is somewhat cursory. This will inform the further efforts made by the CSSCU in ensuring that the communication strategies undertaken emphasise the purpose, function and intention of the CSS which is to create safer contexts for children and young people.

Question 5: Have you ever seen or been given a copy of a Child Safeguarding Statement?

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55.43% of parents advised that they had not ever seen a Child Safeguarding Statement. 2.95% of parents said that they had seen one because they had asked for it, 20.26% of parents stated that they had been provided a copy of one and 19.71% of parents said they seen a copy of a child safeguarding statement on a notice board; 8.1% indicated 'other' in their responses. The data demonstrates a significant gap in respect of the difference between the awareness parents have around child safeguarding statements and the experience the parents have of seeing these statements. This also informs the understanding that parents will have in respect of the purpose and function of the Child Safeguarding Statement.

This is further expanded on in the responses to the open-ended questions.

6. Qualitative Findings

An open-ended question, 'Is there anything else that you would like to tell us about safeguarding statements' was asked of participants to allow for qualitative data be gathered. In analysing the data that was generated 5 specific themes emerged.

6.1. Positive feedback/ acknowledging importance.

The majority of participants are extremely positive in respect of the requirement of organisation to have child safeguarding statements. Parents spoke about feeling reassured about the safety of their children participating in early years services, school, or extra-curricular activities. Parents advised that they believe safeguarding statements to be integral to safeguarding children and that they demonstrate the professionalism of the organisation. One parent commented on the need to balance the requirement for safety and having enough space for natural engagement. They wrote:

'I think Child Safeguarding statements are really important and necessary. I guess the balance is between keeping kids safe and having enough space for safe and natural engagement. We don't want volunteers who are the backbone of sports and other youth clubs to be so terrified that they no longer volunteer. The work done in schools to help kids spot and speak up about abuse is excellent.'

6.2. Statements are not Displayed.

Despite this positivity that parents expressed in relation to the need for Child Safeguarding Statements many parents advised that they had, in many situations, not seen the statement. It was noted by a number of parents that whilst they had seen the CSS in either early years services, or school services, they had not been provided with copies of statement in extra-curricular activity settings. Additionally, parents advised that at times they feel the need to specifically request statement from providers and that they are not always comfortable with this as it can create an awkwardness in relation to justification for requesting statements from providers.

One parent wrote:

'I had a concern about an after-school class my child attended, and it was not clear what safeguarding measures were in place and there was nowhere for me to look.'

This results in the disempowerment of parents in respect of their ability to request information that should be readily available to them.

6.3. The CSS is a 'Paper exercise/ tick the box exercise'.

A significant number of parents were of the view that the Child Safeguarding Statement is a paper or tick the box exercise that services are required to under law to have but that it is not considered a meaningful exercise in the effective effort to ensure children are kept safe whilst availing of a service. Parents expressed that the protection of children depends on the implementation of policies and the practices and that often the wording used by providers is overly complicated and wordy. Parents referenced the need for robust inspection processes and that ongoing training of staff as critical to the effectiveness of any policy. One parent commented that *'some of them seem to be a copy and paste document and not unique to the service. This makes you wonder would they know what is in their policy if you asked them'*. This is consistent with the experience of the CSSCU following review of statements and regular feedback provided to organisations that statement should be specific to the services being provided in order for it to be meaningful to the associated risks.

6.4. Communication and Display recommendations

Many parents provided suggestions in respect of how Child Safeguarding Statements could be more effectively communicated. A significant number of parents stated that

it should be displayed prominently. This is a requirement of the legislation, so it is concerning that parents are making this requirement a suggestion and that they are reporting that this does not routinely occur. Parents spoke of how they should be provided with a copy at the point of paying for any service, that they should be required to sign that they had received this copy and that it should be more readily available on the service website. One parent suggested that stickers should be put up in prominent places providing basic information in respect of the Relevant Person and that 'we protect children' being explicitly stated. Additionally, parents spoke of how the language should be clear and accessible.

6.5. Knowledge based on professional/ volunteer experience

A small but relevant number of parents noted that they had awareness of Child Safeguarding Statements only because they either volunteered with a sports club or were involved in safeguarding through their professional role. These parents noted that they do not believe they would have had any awareness of the requirements of organisations to have Child Safeguarding Statements.

7. Summary

The data gathered in this survey indicates that parents are aware of the necessity of organisations to have Child Safeguarding Statements in place. However, the data indicates that parents are not routinely seeing statements or being provided them by organisations. This influences the capacity of parents to understand how the CSS maybe a useful and purposeful document to inform their understanding of safeguarding within an organisation.

Parents are positively disposed towards the concepts of collective responsibility for safeguarding children, but the data suggests that in the absence of consistent implementation it is difficult for parents to have more than a cursory understanding of the scope of the Child Safeguarding Statement in keeping their children safe.

8. Conclusion

Overall parents have a good understanding of the requirement for services to have Child Safeguarding Statements. However, there is a gap evidenced in respect of implementation by services demonstrated by parents. This further informs the understanding parents have in respect of the purpose and function of Child Safeguarding Statements and the capacity for parents to be assured that safeguarding is prioritised within services.

Poor implementation of the statutory requirements for communicating and displaying Child Safeguarding Statements appears to be the strongest finding emerging from the survey. This suggests that greater efforts are required to communicate the requirement of services to publicly display the Child Safeguarding Statement and ensure that parents are also fully informed of this legal requirement.

It is our interpretation that that the intention of the act is that parents, young people, and children, and all interested parties should have access to the content of the Child Safeguarding Statement. Starting from that intention organisations need to have communication strategies that ensure that Child Safeguarding Statements are easily accessed and understood by those they effect.

Parents are aware of the need for organisations to have strategies in place to keep children safe but it's not always clear about how parents can access these policies and procedures. The CSS should clearly set out how parents can access these policies and procedures through contact with the Relevant Person.

This brief survey has provided good information to inform further development and approaches taken by the Child Safeguarding Statement Compliance Unit.

9. Recommendations

- 1.** It is clearly a concerning finding that the Child Safeguarding Statements are not routinely available and easily accessible. A clear strategy for communicating to organisations about their legal requirement to display the Child Safeguarding Statement is required.
- 2.** It's clear that parents consider that the Child Safeguarding Statement is a good thing and that they feel assured that their children are safe based on these statements. This position will inform further engagement by the CSSCU with oversight bodies in non-regulated services such as sports organisations, to remind them of their organisation's responsibilities in respect of compliance and implementation of the CSS.
- 3.** The CSSCU will look to develop further research with parents about their understanding of the CSS and how best they believe parents could learn more, particularly in respect of risk assessments.
- 4.** Further clarity is required in respect of the scope and function of the Relevant Person. The CSSCU would deem it appropriate that this person is best placed to provide information to parents in respect of accessing the Policies and Procedures of the Child Safeguarding Statement.