

# Third Update

# St John Ambulance Ireland Response to Dr Geoffrey Shannon SC's Independent Review of the Handling of Past Complaints of Abuse in St John Ambulance Ireland

St John Ambulance Board of Directors

June, 2024

-

<sup>&</sup>lt;sup>1</sup> Now His Honour Judge Geoffrey Shannon of the Circuit Court



# **CONTENTS**

OVERVIEW	2
RECOMMENDATION 1:	6
RECOMMENDATION 2:	9
RECOMMENDATION 3:	10
RECOMMENDATION 4:	15
RECOMMENDATION 5:	19
RECOMMENDATION 6:	23
RECOMMENDATION 7:	28
RECOMMENDATION 8:	30
RECOMMENDATION 9:	34
RECOMMENDATION 10:	36
RECOMMENDATION 11:	40
COMMISSIONER'S CONCLUSION	44



# **OVERVIEW**

This document outlines how St John Ambulance Ireland (SJAI) is progressing with its responses to the findings of the independent safeguarding review carried out by Dr Geoffrey Shannon SC, tracking progress against commitments the organisation has made.

The review was commissioned by SJAI in response to a number of complaints of sexual abuse of members under the age of 18 years, relating to one former volunteer member, who ceased volunteering with SJAI circa 2000/2001.

The Independent Review was asked by SJAI to review the adequacy and effectiveness of SJAI's response to complaints of sexual abuse within the organisation. He was also asked to assess the current safeguarding practices within SJAI, to inform areas of learning and further improvement.

In his report, Dr Shannon made a series of recommendations. SJAI has accepted every recommendation in the report in full and is committed to implementing them all in the earliest possible timeframe.

This, our third response document update, sets out each of the recommendations made by the Independent Review and outlines the actions that St John Ambulance Ireland has taken to date to implement every proposal.

For ease, the recommendations made are grouped, in this document, by theme.

Beyond the implementation of these recommendations, SJAI will always strive to meet the highest standards of child safeguarding possible.

We recognise that best practice will continue to evolve, and we will constantly review our operations to ensure that we meet and exceed the required standard, so that the mistakes of the past do not happen again.

### **GOVERNANCE**

SJAI has been in existence as a charity since 1903 and transformed itself from an association to a Company Limited by Guarantee (CLG) with effect from 2019. As a consequence, SJAI is now governed by a company Board of Directors, each of whom have assumed their role on a voluntary basis.

Work to refresh the Board has continued since our last Update Report. As part of this process, we have recently appointed a new chairperson of SJAI, Ms Hilary McBain. Ms McBain is an education consultant and formerly a school principal with significant leadership experience in the field of education. Her decades of experience in the education sector, including board roles in national organisations like the Irish Primary Principals Network, mean she has deep expertise in safeguarding best practice, including delivery of safeguarding training. She also has extensive



experience in the voluntary sector and has held a range of board memberships in educational and voluntary organisations. Following Ms McBain's appointment, interim chairperson Richard Ensor will step down from the board as previously indicated. We thank Richard for agreeing to act as interim chairperson to faciliate the board refresh process.

We have also appointed four new independent directors, adding significant experience in the fields of law, children and human rights, accountancy, technology, and safeguarding.

As previously reported, in September, Mr. Eoin Lawlor BL joined the Board as a Director. Mr. Lawlor is a Barrister with almost two decades of experience across practice areas including 3 children's rights, human rights, and criminal law. We welcome Mr. Lawlor to the Board and believe his professional expertise and experience will be invaluable to the organisation.

In December 2023, Mr. Adrian Murphy (FCA MBA BBS), a Chartered Accountant with over 20 years' experience joined the Board. He is currently a Director with a US Multinational managing the Global Internal Controls function and previously worked in a number of Senior Financial roles across different commercial sectors including Financial Services, Logistics and Manufacturing. He has also held several Directorships with a number of not-for-profit organisations in the UK and Ireland and more recently as Chair of the Citizens Information Phone Service.

Also, in December, Mr Amado Hidalgo joined the Board as a Director. Mr Hidalgo, a Spanish national, has been working in the multinational tech industry in Ireland for the past 25 years. He has volunteering experience in areas of human rights and children's safeguarding.

In February 2024, Ms. Lynda McGivney Nolan FAOI MSc MBABO, joined the Board as a Director. Lynda is an optometrist, specialising in neuro-optometry, brain injury and additional needs. Lynda has over 3 decades of experience working with children and vulnerable adults, practicing in roles as both optometrist and clinical researcher and as such is fully conversant with the ethics and protection of this cohort. In her role as optometric and clinical advisor for Optometry Ireland, Lynda was responsible for developing child protection protocols for optometrists in accordance with Children First legislation and guidelines, as well as developing clinical governance for the profession in Ireland.

This refreshed board will continue to ensure SJAI keeps safeguarding at the heart of its agenda with Child Safeguarding a standing item on Board Meeting agendas.

### SAFEGUARDING OFFICER

SJAI is fully committed to robust implementation of child safeguarding practices and procedures. In this regard, the Board of SJAI appointed Michael Lynch, of Michael Lynch Safeguarding, as our Independent Safeguarding Lead. Reporting to the Board, Mr. Lynch will be responsible for the work of the Child Protection team and ensuring SJAI has best practice Safeguarding in place. He will also work with our Garda Vetting Team and the Commissioner as we ensure the commitments we made as an organisation, following the Independent Review, are delivered in full.



Mr. Lynch is a former Detective Inspector at the Garda National Protective Services Bureau, with responsibility for An Garda Síochána's National Child Protection Unit, Sexual Crime Management Unit and Online Child Exploitation Unit. More recently he worked as Safeguarding Manager at Scouting Ireland for two years and is now a safeguarding consultant developing, reviewing and auditing safeguarding policy and procedures for organisations and providing safeguarding training. He holds a MSc in Child Protection and Welfare from Trinity College Dublin.

The Board wishes to acknowledge the assistance of the Minister for Children, Equality, Disability, Integration and Youth, Mr. Roderic O'Gorman, T.D., in enabling SJAI meet the first-year costs associated with this additional appointment.

# **VETTING PROCEDURES**

SJAI continues to be fully committed to ensuring that all adults within SJAI have been appropriately vetted, including through Garda vetting, the appropriate Tusla online safeguarding training certification, and have undertaken bespoke SJAI safeguarding training before they can become an active participant in SJAI and have any cadet interactions whatsoever.

To support this, SJAI has migrated to Traumasoft, a new integrated management system. Here all members are listed uniquely to the division they are members of, and their data is securely held.

SJAI authorised users either have access privileges at a local, regional, and national level to ensure those who are compliant can partake in SJAI activities, while those who are not, are stood down from active service until they become compliant.

Traumasoft now gives SJAI and its key implementers one source of organisational data and is further endorsed by copies of certificates and disclosure documents which are now uploaded to the new system, having due regard to GDPR requirements.

SJAI has also introduced a new six-stage Adult Volunteering Process (AVP) which integrates with Traumasoft. This gives SJAI the visibility of a prospective member's journey as soon as they pass interview and seek to formally enter the organisation. It also provides authorised users the ability to track their progress, ensuring they complete the obligatory safeguarding and Garda vetting before they can become active in SJAI.

These steps enable SJAI create a robust screening process for new members and are a key contribution to an effective compliance enforcement system for vetting in the organisation. Equally, all volunteers must be re-vetted every three years.

# CONCLUSION

Over the following pages, you will find further detail in respect of each of the recommendations that have been made to SJAI, alongside our commitments and progress towards ensuring our governance and child protection practices meet the highest standards in response.



Upon review, we hope that you will be assured that we are continuing to leave no stone unturned as we implement every recommendation that has been made to us.

Furthermore, we hope our response will provide reassurance to you that we are committed to continuously improving our policies and procedures to ensure that past failings at the organisation are never repeated.

On behalf of the organisation, the Board of SJAI wishes to reiterate its unreserved apology to the victims and survivors of sexual abuse at the organisation. We are sincerely sorry for the hurt that was caused to you, your families, and your friends, by the failings of our organisation. Please be assured that you have been listened to and are believed. We are committed to supporting you in any way possible.

As an organisation, we fully accept the findings of Dr Shannon's report and are committed to implementing the recommendations in full for improvements to our current safeguarding procedures.



# **RECOMMENDATION 1:**

# **APOLOGY**

- **1A** The Review recommends that SJAI should offer an apology in comprehensive terms to victim survivors and others. SJAI should look to other organisations who have been deficient in child safeguarding for assistance in this regard.
- **1B** SJAI should be honest about how its structures facilitated grooming and predatory behaviour.
- **1C** The Review believes it is important for SJAI and others to be very conscious of the fact that several victim-survivors reported that they suffer ongoing and persistent trauma as a consequence of the abuse described in their testimonies.

# **COMMITMENT:**

SJAI is committed to offering a comprehensive apology to all victim-survivors and fully accepts that the organisation's structures facilitated grooming and predatory behaviour in the past. SJAI also acknowledges, and deeply regrets, that victim-survivors continue to suffer ongoing and persistent trauma because of the abuse they described experiencing.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
1A	A written organisational apology has been issued, through the review team, on behalf of the SJAI Board, to all known victim-survivors.  The written apology has also been posted to the SJAI's website to ensure transparency and awareness among victim-survivors and others.  Representatives of the SJAI Board intend to meet with victim-survivors to deliver an apology in person and to facilitate discussion or any questions that may arise.  A letter has been issued to SJAI's membership to apologise for past failings, especially in relation to how the organisation's structures facilitated grooming and predatory behaviour.  SJAI has had regard to other organisations who have been deficient in child safeguarding to inform our approach.	Meetings in person will be held for all SJAI members to explain and discuss the report's findings and recommendations in an open and transparent manner.	These commitments are now complete, and the Board remains completely open to ongoing engagement as and when victim-survivors feel it is appropriate or required.  Access to Counselling remains available at any time a Victim-Survivor wishes to access it.
1B	SJAI fully accepts that its structures facilitated grooming and predatory behaviour in the past.	As outlined throughout this document SJAI will continue through its change programme to ensure our structures are such as to not facilitate grooming or predatory behaviours through more robust accountability and more accessible complaints procedures.	This commitment remains an ongoing priority and is at the heart of the change agenda driving the organisation forward driven by thematic Working Groups established since the Independent Review Report was published.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
1C	SJAI fully acknowledges and deeply regrets that victimsurvivors continue to suffer ongoing and persistent trauma because of the abuse they described experiencing.	As outlined for Recommendation 2, SJAI fully commits to the provision of therapeutic support to all victim- survivors.	This acknowledgement remains steadfast within the organisation.



# **RECOMMENDATION 2:**

# **THERAPEUTIC SUPPORT**

2A - The Review recommends that SJAI puts in place appropriate counselling and therapeutic support for those who came forward to speak with the review and to any others who come forward in response to its publication, to speak of similar harms done to them while in the care of SJAI, expanding on its offer of a consultation and a maximum of six sessions with a counselling service.

### COMMITMENT

SJAI is fully committed to ensuring that it assists and provides support to all victim-survivors. It is clear to SJAI that each affected person has separate needs and the organisation would like to try and meet these.

	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
2A	The Board ensured that a counselling service was put in place for those who came forward to speak to the review.  Service level agreements were put in place with recognised counselling service providers.  Counselling is available to victim-survivors through recognised providers One in Four and My Mind.  SJAI is committed to supporting the number of therapy sessions deemed appropriate by the Counsellor involved without any upper limit.  Counselling can be accessed without SJAI itself knowing directly who has sought the counselling.	The Board would like to expand the therapeutic support services available to all those who came forward to speak with the review and to any others who come forward in the future.  SJAI is working to identify additional counselling providers.	Victim-Survivors can access counselling supports at any time that they feel it would benefit them and SJAI will support in every way possible.



# **RECOMMENDATION 3:**

## **GOVERNANCE**

- **3A** The Review recommends that SJAI undertakes a broad re-examination of its internal governance, transparency and accountability mechanisms. The Review also recommends as part of this process an examination of the potential for putting certain key roles on a professional basis within SJAI to support and facilitate a more dynamic and responsive approach to volunteerism.
- **3B** There is a role for greater professionalism working within a model of volunteerism. To ensure accountability and standards, there are positions within the organisation which should be recruited to allow for applications from outside the organisation. In such cases, selection panels should include external members.
- **3C** The Review recommends a reconsideration of the hierarchical structure and culture of SJAI. The Review recommends the creation of robust internal accountability frameworks which are transparent and apply equally to all ranks of the organisation.
- **3D** Transparency and openness in recruitment and in elections to boards will assist in combatting the factionalism and cliques that can form in many organisations. A system of good governance requires frequent changes in committees and boards.
- **3E** SJAI must conduct its activities in a transparent manner. This means that its units must be inclusive in their governance, and where possible, include representatives of the voices of young people, whether through direct representation, safeguarding officers, or their parents and guardians.
- **3F** The Review recommends that any decision to suspend a member should be clearly and unambiguously communicated in writing to that member, in accordance with fair procedures. The Review also recommends that consideration be given to effective supervision following suspension, to ensure that all terms of such suspension have been complied with and also to ensure the well-being of any cadet members of SJAI who are involved.

### **COMMITMENT:**

We are undertaking a change programme which includes a re-examination of the organisation's governance. The programme will result in flatter and more inclusive team management structures, promoting greater openness and transparency across the organisation.

Our recruitment policy will allow us to draw on professional external expertise to support volunteers in their ambitions and work. Furthermore, SJAI will use its new Associate Member policy to allow experts who cannot, or do not wish, to become active uniform pre-hospital practitioners, to nonetheless assist in other ways where their expertise could support the organisation to operate with enhanced professionalism.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023
3A	SJAI has a change programme under way for some time which commenced, in earnest, with the transformation of the organisation from an association to a CLG in 2018.	A sub-group of the Board will re-convene to advance the governance review element of the change programme. This had been suspended during Dr Shannon's Review. External input will be sought on individual topics as required.  As part of the change programme, SJAI will examine the potential for putting certain key roles on a professional basis within the organisation, while maintaining its overall volunteer-led ethos.	A team established to review the governance in SJAI completed the first phase of its work in December 2023.  The Board of SJAI has appointed an Independent Safeguarding Lead to take responsibly for the work of SJAI in ensuring we have best practice safeguarding in place, working with the organisation's volunteer Safeguarding Team.  The new Regional structures are now in place with key roles filled through open advertisement throughout the organisation. With these appointments, SJAI has sought to bring a fresh mindset into the managing of the change process as well as the day-to-day operations of the SJAI organisation.
3B	SJAI has in recent years taken on a small number of professional, full-time staff at national headquarters.  This group supports the dayto-day running of the organisation.	SJAI is committed to employing more fulltime staff as resources permit and as required.  Certain positions will allow for applications from outside the organisation, as well as from serving volunteers, with the applicable interview panels including external members.	As SJAI continues to evolve through the restructure phases, so will the "Full Life cycle recruitment process". The structure in place allows for 360 feedback based on experiences and onboarding. SJAI are commitment to its members progression and growth.



			Ambulance
	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023
			If the skill sets required are not found within the organisation, then external resources will be sought.
			The governance review process has recommended a number of additional fulltime staff to support the day-to-day running of the organisation and this has received full support from the SJAI Board.
3C	Rank is no longer synonymous with leadership roles. Leadership roles are now competency-based.  The fundamental unit of membership in SJAI is our divisions. The change programme has developed a policy within the divisions replacing 'rank' with 'role'.  Divisions operate in cooperative regions and not in siloes.	We will develop robust internal accountability frameworks which are transparent and apply equally to all ranks of our organisation.	A detailed review has been carried out on the hierarchical structure in the organisation.  Following the review, the rank structure has been removed from the organisation and a process has been put in place where members will be appointed, for a defined term of office, to roles based on their skills and experience rather than time served in the organisation.
3D	SJAI is fully committed to transparency and openness in its operations.  There are existing term limits in place for board members.	As part of the modernisation agenda, SJAI will continue the move from a Rank-led structure to one where appointments or assignments are made to key leadership roles with terms of office and strict time limits obtaining – e.g. five-year terms. This will align with the provisions for the Commissioner to hold office for five-year terms at a time,	All new positions are now advertised nationally within the organisation and interview panels are put in place to have full transparency in the interview process.  New job descriptions have been created for all new positions indicating the required roles & responsibilities.



			Ambulance
	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023
		renewable if the Board deems appropriate.  Certain positions within the organisation will be advertised externally, and also open to individuals who are not prehospital, uniformed members.	Every role has now a fixed term to ensure leadership positions are regularly reviewed and opportunities for new talent within the organisation are identified.  Skills and proven ability have replaced length of service in SJAI as a key consideration.
3E	We are implementing a change programme, which has at its core the replacement of a rank-based hierarchical structure with a more collegiate management team approach, and a divisional manager in the lead.  We have changed our divisional management structures to be more inclusive and will now operate five-year terms of office which will allow the voices of younger and newer members come to the fore.	Our change programme will deliver increased transparency and accountability in decision-making at all levels.  The programme will ensure that each division is more inclusive in its day-to-day operations and governance.  We will explore, as part of the change programme, how representatives of the voices of young people can be most effectively included with regard to governance. This will include reaching out to other organisations, to listen to their insights. We will also listen to the voices of younger members as part of the governance review element of the change programme.  We will ensure, through the cadet and youth development team, that cadet divisions have more direct engagement with our young people, including through their parents and	A new enterprise management system is now in place "Online Cadet Manager" to support the operation of the Cadet Divisions and includes parental access. This enables parents to view ongoing progress of their children including authorising activities for their children.  A Cadet forum is in place where Cadets have a voice in the running of their Divisions.  A national vote system is in place where Cadets can voice their opinion on key topics which affect them.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023
		guardians. We have acquired a new enterprise management system to make this easier for parents and guardians.	
3F		The disciplinary process will be fully reformed and transparent while respecting fair procedures. The new policy will be brought into effect by the end of Q3 2023.  We are considering how to implement effective supervision following suspension, to ensure all terms of such suspension have been complied with, and also to ensure the well-being of any cadets who are involved. This will inform the development of the revised disciplinary policies and procedures.	A review of the SJAI complaints procedure, separate from the processes in respect of safeguarding, has been completed and incorporates the communication process as well as an effective supervision of a member following suspension.



# **RECOMMENDATION 4:**

### **CULTURE/ETHOS**

- **4A** A change in culture and ethos is needed in SJAI. It should abandon its military and hierarchical structures.
- **4B** Rank and status in the hierarchy of SJAI should not be prioritised ahead of rewarding and acknowledging skill, knowledge and integrity. Even as the organisation remains a structured one, with layers built on experience, it should move to become a more open one. This change in ethos should

mean a move away from a culture of impunity from accountability for more senior members of SJAI.

- **4C** Members including cadets should feel open to question the structures and workings of the organisation, and should not operate within a chain of command structure.
- 4D There should be no restriction within the organisation on a member or officer taking legal action against another member or officer, and it should be made clear to all members that the former such rule (rule 122 of the 1947 Rules and Regulations of SJAI) is amended or removed to reflect this position. The

Review strongly recommends that rule 122 be removed from the SJAI rules and regulations.

**4E** – The Review believes that beyond pre-hospital best practices, SJAI lacks professionalism in some of its operative culture. This lack of professionalism poses a continuing threat to the implementation of robust and effective child protection systems. The Review recommends that SJAI takes steps to consider this lack of professionalism through the implementation of robust and effective child protection systems.

### **COMMITMENT:**

SJAI is implementing a change programme which will make the organisation more transparent, open and inclusive.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
<b>4A</b>	A change programme is under way which will make the organisation more transparent, open and inclusive.  We have made strides in developing a more open culture, centred on our values of volunteerism, caring, courtesy, professionalism, commitment, transparency and accountability.	SJAI's remaining military and hierarchical structures will be abolished on a phased basis over the next 12-18 months (note: new structure is in place from July 2023, with remaining military and hierarchical structures phased out by December 2023).  We will ensure that our change programme continues to promote inclusivity by all our volunteers.  We will revisit our values and ensure that they are being lived out day-in, day-out.	The change programme remains ongoing within the organisation largely driven by the volunteers themselves.  Changing the management and oversight culture and ethos at SJAI is our priority and is mission critical to the sustainability of the organisation over time.
48	New skills-based terms of reference have been devised for all posts in SJAI which prioritise skills and knowledge brought to the organisation.  Terms of office apply to all appointments to allow regular changes of role, and of those who hold leadership positions.	We will apply a maximum term of office of five years to all appointments, renewable only by deliberate decision.  We will ensure that once a member completes a term of office, the volunteer vacates their position in the management structure in favour of continuing to volunteer at ground level.  We will ensure that accountability is transparent, consistent with a volunteers' entitlement to confidentiality on sensitive matters.  Robust accountability frameworks that apply equally to all members of the organisation will be developed.	These commitments are in place and now largely complete within the organisation.  A more modern accountability system is now in place which is based on an open, transparent system where each member will have an input into the programme for change. The hierarchical rank-based, chain-of-command system is replaced with Regional and Divisional teams working closely together and in collaboration with each other. Feedback, progression is monitored and reported via a score card, which will be available to the Board .  Role Profiles for each role in SJAI now have terms of reference against which performance is assessed.



			Ambulance
	WE HAVE (as at March	WE WILL (as at March 2023)	PROGRESS (since March
	2023)	WE WILL (as at March 2023)	2023)
			Terms of office also ensure that all leadership positions are refreshed on a regular basis (either 3 or 5 years).
			Performance targets allow SJAI better hold post-holders accountable for performance with a new Compliance function up and running and underperformance more proactively addressed than hitherto.
			Our new Regional structures overseen by Regional Managers ensure that individual Divisions cannot operate in siloes with greater supervision and accountability now in place.
4C		We will ensure our change programme encourages an open, questioning, culture.	This commitment remains an ongoing priority as part of the change agenda we are implementing with the organisation.
4D	We have now removed Rule 122 from our Rules & Regulations.		Completed ahead of a full review of our Rules and Regulations which is underway.
4E	We are fully committed to implementing robust and effective child protection systems.  We have a standalone safeguarding team which operates outside ordinary reporting structures.	SJAI will recruit a professional safeguarding officer to work in NHQ.  SJAI will expand its safeguarding committee to include external members.  SJAI will introduce a system of checks and audits of our	The Board of SJAI has appointed Michael Lynch, of Michael Lynch Safeguarding, as our Independent Safeguarding Lead to complement the volunteer Safeguarding Team.



		Allibulatice
WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
	safeguarding implementation on	Other fulltime posts are
SJAI has invested in a new	a structured basis.	being considered as the
Enterprise Management		change programme
System that moves the	SJAI will have a cadet Enterprise	identifies specific needs and
organisation from an ad-	Management System operational	if required will seek eternally
hoc system of databases	by the end of 2023.	qualified persons to fill these
to a central, dynamic,		positions.
single database that		
professionalises individual		Equally, SJAI will look to an
member and supervisor		Associate membership
real-time information.		structure to invite others to
		assist the charity in its
SJAI has informal		governance and operations
occasional, access to		without becoming
professional expertise		uniformed
outside SJAI, when advice		responders/practitioners
is required, as well as the		where such citizens wish to
opportunity to take		support SJAI but cannot
advice from those		commit to pre-hospital work
professionals who		itself.
volunteer in SJAI and		
provide their personal		
expertise to policy making		
(medical, nursing,		
teaching etc.).		



# **RECOMMENDATION 5:**

### **COMPLAINTS HANDLING**

- **5A** The current system of Courts of Inquiry should be abolished or significantly reformed to ensure compliance with child protection regulations and national guidance.
- **5B** The Review recommends that SJAI develops formal guidelines to deal with grievances and complaints.
- **5C** There must be a robust complaints procedure, following the best practice and experience of other organisations.
- 5D The Review recommends enhanced ongoing communications processes for those who make complaints, and that complaints processes are managed with a greater emphasis on transparency and institutional confidence building for the membership.
- **5E** Clarity is vital, both to any potential complainant, to know where to make a complaint, and to any child safeguarding officer, to know how to respond.
- **5F** Fair procedures and constitutional rights must be given to those against whom accusations have been made. This should be provided for in a structure that recognises the best interests of any child in question and the young people generally under the supervision of SJAI. A priority must be the prevention of any potential further harm to children.
- **5G** The complaints procedure must be transparent and clear to all. Information on how to make a complaint should be structured in a manner which is age-appropriate and age-sensitive, so that any cadet can easily understand who they can speak to if they have a complaint.
- **5H** The complaints procedure should provide alternates, to account for situations where the designated local child safeguarding officer is not someone the minor is comfortable addressing their particular complaint towards, or if they are absent for any reason.

# **COMMITMENT:**

SJAI is committed to introducing, on a formal basis, a modern grievance and disciplinary system that is fair, transparent, procedurally robust, and efficient.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
5 <b>A</b>	The Courts of Inquiry system has not been invoked since the current Commissioner assumed office in January 2014.	The existing Courts of Inquiry system will be formally abolished and replaced by a new, modern, grievance and disciplinary system.	Pending a full re-writing of our operational Rules & Regulations, Courts of Inquiry are no longer invoked within SJAI for disciplinary matters while a revised accountability system is under consideration.  A more modern accountability system has been prepared which will be a more open and transparent system and should be formally approved early in Q4.
5B	We have a clear pathway for the making of safeguarding complaints.	SJAI will include formal guidelines for all members in our new grievance and complaints procedures.	This is now complete for safeguarding while the separate or distinct process for non-safeguarding grievances or complaints is being reviewed and updated.
5C	SJAI has developed a draft revised grievance and complaints procedure which needs to be concluded and brought into use.	We will ensure our new grievance and complaints procedure follows the best practice and experience of other organisations.	The newly recommended process, in respect of non-safeguarding issues, which is being developed/finalised includes a step-by-step flow chart in the decision making process so that all members are clear on how the system operates.
5D		Enhanced ongoing communications processes for	In place.



	WE HAVE (as at March		PROGRESS (since March
	2023)	WE WILL (as at March 2023)	2023)
		those who make complaints will be included in our revised grievance and disciplinary procedure, and complaints processes will be managed with a greater emphasis on transparency and institutional confidence building for the membership.	
5E	We have a complaints process that is fully compliant with Children First, under which any safeguarding issues can be raised.  Our safeguarding training includes specific information on how to make a complaint and the minimum information required.	We will clarify for all, the separate and distinct pathway for making child safeguarding complaints as distinct from raising other, nonsafeguarding, issues.  All members will regularly be reminded as to where they should go with a child safeguarding complaint.	For safeguarding, this is fully in place.  For non-safeguarding complaints, the existing complaints procedure is being reviewed to ensure it is aligned with best modern practice.
5F	Fair procedures and constitutional rights will continue to be given to those against whom accusations have been made, recognising the best interests of any child in question and the young people generally under the supervision of SJAI is paramount.	We will ensure that any cadet who makes a complaint has the appropriate support, so as to ensure their best interests are recognised and further harm prevented.	The fifth edition of the organisation's safeguarding policy has been reviewed to ensure that it reflects these objectives in a clear and accessible way and is available on the SJAI public website as well as our internal members' SharePoint site.
5 <b>G</b>	We have developed clear guidelines on how a cadet can make a complaint.	We will review and, where appropriate, revise, the safeguarding complaints procedure to ensure it is transparent and clear to all. Information on how to make a complaint will be structured in a manner which is age-appropriate	We believe the current arrangements in place from a safeguarding perspective fully meet this requirement.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
		and age-sensitive, so that any cadet can easily understand who they can speak to if they have a complaint, and how the complaints procedure works.  We will ensure that cadets continue to have direct access on	
		how, and to whom, to make a safeguarding complaint, including bullying.	
5Н	Existing procedures include more than one avenue for registering a safeguarding complaint.	The complaints procedure will continue to provide alternates, to account for situations where the designated local child safeguarding officer is not someone the minor is comfortable addressing their particular complaint to, or is absent for any reason.	Current procedures provide more than one avenue for raising a safeguarding complaint, including a team approach such that no one person is the sole option for the receipt of a safeguarding complaint within SJAI.



# **RECOMMENDATION 6:**

# **CHILD SAFEGUARDING OFFICERS**

- 6 A- The national safeguarding officer should be independent of SJAI. It should be a full-time role. However, it may be appropriate for this position to be held by an individual in conjunction with the same position for other organisations with similar aims and structures.
- 6B— Recruitment for the national safeguarding officer role should focus on experience with child welfare, rather than any experience of SJAI as an organisation, although experience with child welfare within a large organisation would be desirable.
- 6C Further to the appointment of a national safeguarding officer, each branch of SJAI should have a local safeguarding officer. This is not to suggest a hierarchy or chain-of-command when reporting. All safeguarding officers are mandated persons under the Children First Act 2015, and must be aware of their reporting duties, functions, and responsibilities under this legislation.
- 6D SJAI and its local branches must provide details of the local safeguarding officer to all those working within and with SJAI, whether cadets, their parents, guardians or officers. Any changes to this information should be communicated as early as possible, and this information must always be readily available.
- **6E** All child safeguarding officers should know the relevant contacts in both the Child and Family Agency/Tusla and An Garda Síochána for any complaints concerning the welfare and the safety of a child.

# **COMMITMENT:**

SJAI will recruit a professionally qualified person to the role of National Safeguarding Lead to augment the existing dedicated volunteer safeguarding team. This Lead will review all existing policies and procedures to ensure best practice continues to be implemented by SJAI in regard to safeguarding children and vulnerable adults. The holder of this post will be able to report directly to the Board of SJAI on all safeguarding matters.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
6A	SJAI has an existing dedicated safeguarding team with access to non-SJAI external expertise. This allows for external advice and guidance to be sought from time to time on case management.	The Board has approved the hiring of a national safeguarding officer, independent of SJAI. The Board aims to have identified a suitable candidate by the end of Q3 2023.  We envisage the role will be held by an individual in conjunction with the same position for other organisations with similar aims and structures.	The Board of SJAI appointed Michael Lynch, of Michael Lynch Safeguarding, as our Independent Safeguarding Lead at its April Board meeting.  Mr. Lynch will lead the work of the Child Protection team on ensuring SJAI has best practice Safeguarding in place.  He will also work with our Garda Vetting Team and the Commissioner as we ensure the commitments we made as an organisation, following the Independent Review, are delivered in full.  He will report directly to the Board of SJAI.  Michael Lynch is a former Detective Inspector at the Garda National Protective Services Bureau, with responsibility for An Garda Síochána's National Child Protection Unit, Sexual Crime Management Unit and Online Child Exploitation Unit. More recently he worked as Safeguarding Manager at Scouting Ireland for two years and is now a safeguarding consultant developing, reviewing and auditing safeguarding policy and procedures for organisations and providing safeguarding training. He holds a MSc in Child



WE HAVE (as at March 2023) PROGRESS (since	ce March 2023)
Drotaction and M	
Trinity College D	Welfare from Dublin.
As already noted of SJAI has appo Michael Lynch, o Lynch Safeguard Independent Saf Lead.  Mr. Lynch is a for Detective Inspec Garda National P Services Bureau, responsibility for Siochána's Natio Protection Unit, 10 Crime Managem Online Child Exp Unit. More recensive worked as Safeguarding officer role will focus exclusively on experience with child welfare, ideally in a large organisation.  Recruitment for the national safeguarding officer role will focus exclusively on experience with child welfare, ideally in a large organisation.  Recruitment for the national safeguarding continue to the total value of the voice of th	former ector at the I Protective u, with for An Garda cional Child t, Sexual ment Unit and exploitation ently he eguarding outing Ireland and is now a consultant viewing and uarding policy is for and providing raining. He Child Welfare from Dublin.  I aligned in has all review in ith the Tulsa am, and is have been and are now e National



	WE HAVE (as at March	WE WILL (as at March 2023)	PROGRESS (since March 2023)
	2023)	WE WILL (as at Marcii 2023)	The updated documentation has been circulated to all SJAI membership.  SJAI has set its revision date for our policy statement and risk ratings for January 2024 in line with best practice of biannual reviews.  SJAI is committed to a continued review and monitoring of all our policies in place with a full communication with Tusla
			on currency and continuous improvement.
6C	We have a number of regional safeguarding officers and the safeguarding team is already looking to expand that cohort in 2023.	All safeguarding officers will be fully aware of their reporting duties, functions, and responsibilities. Training will be reviewed to ensure that best practice is maintained in our training of all with safeguarding roles, including with regard to accessing outside expertise and advice.  We will ensure all safeguarding officers are regularly reminded of their duties.	Regional Safeguarding roles have now been identified and a review process will be implemented to see to see if further expansion is required.
6D	Notices must be prominently displayed in all our divisions, identifying the local safeguarding officer for all who may wish to contact them at any time in a discreet manner	We will review the adequacy of, and prominence given, to the details of our local safeguarding contacts. We will ensure prominence of that information is to the fore.	CompletedAll Cadet Divisions are required to have a Safeguarding Notice with relevant contact details in a prominent place during all meeting nights.
	Such local information is made available to cadets' parents and guardians or officers.	We will ensure that cadets' parents and guardians are reminded of the local safeguarding points of contact, including through prominent	SJAI have continued to promote access to information on safeguarding supports and access to the relevant people.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
		placement of the information on divisional, as well as national websites.  We will ensure all changes to the relevant information will be communicated as early as possible.	
<b>6E</b>	Our national safeguarding policy has full information for all our safeguarding officers regarding the relevant contacts in both Tusla and An Garda Síochána for any complaints concerning the welfare and the safety of a child.  The national safeguarding policy also has clear guidelines on when any safeguarding officer should contact Tusla and An Garda Síochána.	As a priority we will ensure that all volunteers with safeguarding roles have instant access to the relevant contact information for Tusla and for An Garda Síochána, should any complaints concerning the welfare and the safety of a child require immediate notification.  We will ensure that all Tusla and Garda contact information is prominently displayed in divisional meeting places, training halls, national HQ and venues where SJAI provide prehospital cover and regular spot checks will ensure full compliance.  We will ensure all safeguarding officers are regularly reminded of the relevant statutory contact information.	All contact details have been updated and aligned to national website for access.  All regions have clear lines of communication and full access details of current safeguarding leads.



# **RECOMMENDATION 7:**

## MAINTENANCE OF RECORDS

- **7A** Membership officers in each branch should be aware of the renewal policy, including the requirements for regular re-training and re-vetting. Membership and contact lists must be kept up to date and retained in line with data protection policies. In the immediate term, this will require appropriate investment in resources to resolve current issues with membership lists and management systems.
- **7B** The Review recommends that SJAI should institute a system of typed and dated reports for each complainant and every incident or suspected incident affecting child protection or raising child safeguarding concerns.
- **7C** The Review recommends that typed and dated notes and records of each meeting where any child protection concerns are considered should be kept in hardcopy format. These must be accessible by the national safeguarding officer and by the relevant state agencies (Tusla and An Garda Síochána). All information should be kept securely in offices or premises of SJAI, and must not be taken to the residences of SJAI members or officers, or any other locations.

## **COMMITMENT:**

SJAI is committed to ensuring that all active members are compliant with the safeguarding policies, and that membership records are kept up to date. It is also committed to a safeguarding reporting system that meets the required standard, with all typed and dated reports maintained securely.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
7A	We are investing, and will continue to invest in the required resources to ensure membership lists and management systems are up to standard.  Members are notified on a regular basis regarding the requirement for obligatory safeguarding training.  Traumasoft, an Enterprise Management System (EMS), including a membership resource section, is in place. This is the primary reference for members' details including safeguarding status.	The Enterprise Management System will notify members and divisions by email that their safeguarding certificates are close to expiring and need to be renewed.	Review of Traumasoft upload of all member details complete and now monitored by Safeguarding/Vetting and Compliance teams.  Additionally, continuous compliance audits are in place, with Traumasoft now fully active in uploading of all members details and continuous access for the relevant people.
7B	Our safeguarding team have been advised that all their reports should be typed and dated.	Safeguarding practice will be updated to reflect this recommendation.  We will monitor compliance with this instruction on a continuous basis.	Internal report form has been updated and available to all members through internal access point and this form is now fully aligned to all practice.
7C	Child protection reports are kept securely in hardcopy format within locations belonging to SJAI.  These are accessible to our safeguarding team and to other relevant State agencies.	The safeguarding team will monitor to ensure compliance with this recommendation.	Completed. All files now stored in NHQ; any ongoing reports once completed are filed in the lockable safe in NHQ.



# **RECOMMENDATION 8:**

## **CADETS**

- 8A- The Review recommends that the cadets should be maintained as a core component of SJAI, subject to appropriate rules in place regarding supervision and management of cadets, with those rules being rigidly enforced.
- 8B In its cadet activities, the interests and views of younger members must be at the centre of how SJAI operates. Cadets should be considered as members who have a contribution to make. SJAI needs both a culture of safeguarding, and a practice of including, cadets within its structures.
- **8C** The cadets within SJAI should be valued as an important function within the organisation. In activities where cadets take part, it is imperative that their needs as children and adolescents are pre-eminent. Activities should take place in an atmosphere and an environment that encourages growth and personal development, allowing cadets to build on their skills, whether those particular to the aims of SJAI, or of any voluntary organisation. This means providing them with roles appropriate to their skills, training, understanding and progress. SJAI should respect the individuality of each of their cadets, recognising that their needs will differ.
- 8D SJAI must ensure that all appropriate measures are in place to ensure the safety of and well-being of cadets in its care at all times. The Review believes that this should include appropriate rules with regard to supervision and management, in particular when cadets are taking part in any offsite activities or overnight stays.

### **COMMITMENT:**

Cadets will continue to be a significant part of SJAI providing learning and development opportunities for 10-17 year olds, as well as serving as a potential pool of adult volunteers and future leaders for SJAI and wider society. Our cadet and youth development department will continue to lead and advise on the appropriate rules governing all aspects of cadet management (from supervision to curriculum to how SJAI evolves). These rules will have to be signed off by the Board of SJAI. Rigid enforcement of the cadet rulebook will be ensured.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
8A	SJAI has a dedicated cadet and youth development department which designs and updates the programme of activities for our cadets.  We have clear requirements for minimum adult supervisory ratios.  We have closed cadet divisions where minimum adult-to-cadet ratios could not be maintained.	We will ensure there are appropriate rules in place regarding supervision and management of cadets, and enforce them rigidly.  We will review these rules continuously to ensure they are in line with best practice.  We will ensure that the cadet and youth development department enjoys the full and equal support of NHQ as all other areas of activity of SJAI.  We will ensure that adult-to-cadet supervisory ratios are always observed.  SJAI will work with other youth organisations to inform best youth development practice while maintaining the unique attractiveness of SJAI.	We have formalised the Cadet Division Manual which sets out the expectations and requirements of Youth Leaders in running practice sessions, activities, and trips with Cadets.  The Cadet Division Manual SOP (Standard Operation Procedure) requires for the Manual to be reviewed annually at minimum by the Cadet & Youth Development Department or when there are National updates to other Organisation Polices (including Safeguarding).  A Director is appointed to oversee the Cadet & Youth Development Department and attends Department Head meetings with all other Departments.  Minimum supervisory ratios are set out in the requirements of the Safeguarding Policy and Cadet Division Manual.
8B	We have cadets in leadership positions within our cadet divisions.	We will enhance opportunities for cadets themselves to influence how the cadet movement is operated at local, divisional, and national level.  We are committed to ensuring that the interests and views of younger members are at the centre of how SJAI operates, not	The Cadet Division Manual sets out recommendations for how Cadets can have a say at Divisional level.  This includes: -Forming the Division Code of Conduct -Input into training activities



			Ambulance
	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
		only at the cadet level, but for the organisation as a whole.	-Input into non-First Aid related activities at Division practice sessions.
		We are committed to ensuring that a robust safeguarding regime is in place, and continuously reviewed, in order to maintain best practice.	At National Level the Cadet & Youth Department is drafting policy to set up a Cadet Council which will be called "Cadet Forum". The
		We will explore, as part of the change programme, how representatives of the voices of young people can be most effectively included with regard to governance. This will include reaching out to other organisations, to listen to their insights. We will also listen to	Cadet Forum will consist of quarterly meetings where Cadet representatives from all Cadet Divisions will meet together to discuss Cadet initiatives and ideas and report directly to the CYD Team.
		the voices of younger members as part of the governance review.	The Cadet Division Manual sets out recommendations on addressing the individual needs of Cadets within the preparation and implementation of Division Training Plans.
			"Online Cadet Manager" system is now up and running.
8C	SJAI's structures endeavour to allow each cadet develop to their potential by	We will review structures within our cadet divisions to ensure individual development is preeminent and that it respects the individuality of each cadet.	The Cadet Division Manual sets out recommendations on addressing the individual needs of Cadets within the preparation and implementation of Division Training Plans.
	assigning each cadet with roles and training appropriate to their skills.	We will ensure cadet activities take place in an atmosphere and environment that encourages growth and personal development, allowing cadets to build on their skills.	The Cadet Youth Award (formerly the SJAI President's Badge) is in the process of being updated and expanded in content. This Award is similar to the An Gaisce scheme and introduces Cadets to



			Ampulance
	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
			activities outside care and nursing to include outdoor activities and skills that seeks to enhance personal development and growth for each Cadet aligned to that Cadet's individual capacities.
8D	An "out and about" policy is being implemented on an interim basis under which all trips involving cadets must be approved in advance with adult-to-cadet supervisory ratios a minimum requirement.  We have a de-facto cadet management handbook specifically tailored to the running and management of cadet divisions.	We will ensure all appropriate measures are in place to ensure the safety and wellbeing of cadets in SJAI's care. We will have the "out and about policy" formally approved and continue to ensure that it is rigidly enforced.  We will charge the cadet and youth development department to formalise the cadet management handbook after reviewing it to ensure all issues and recommendations in Dr Shannon's report are fully implemented.  We will ensure both policies – the out-and-about policy and the cadet management handbook - are formally approved by the cadet and youth development department, Commissioner, safeguarding team and board before end-June 2023.  We will ensure the cadet and youth department reports on an annual basis directly to the Board of SJAI on its work and achievements as well as any additional supports required.	The Out and About Policy is in place and updated in line with current best practice.  The Cadet Management Handbook (Cadet Division Manual) has been completed and approved by the Board.  The Cadet & Youth Dept prepares monthly progress reports that are issued to the Department Head Group and Commissioner.



# **RECOMMENDATION 9:**

# **EDUCATION/TRAINING**

- 9A It was noted on one of the files made available for inspection during the Review that an internet safety education session was held by SJAI in one division, involving both parents and cadets and An Garda Síochána. It is the view of the Review that such education and training sessions should be provided to all members and divisions within SJAI.
- **9B** All members of SJAI are to be required to undergo the SJAI safeguarding training and course and the Children First e-learning programme.
- **9C** Within their third year, members must have completed Garda vetting, the Children First elearning certificate, and SJAI safeguarding training.

### **COMMITMENT:**

SJAI is committed to ensuring that its members are compliant with all strands of the safeguarding policy. Members who are non-compliant will be stood down from all activities until the issue is rectified.



	WE WILL (as at March 202	3) PROGRESS (since March 2023)	WE HAVE (as at March 2023)
9A		The internet safety education session will be carried out in all divisions, every two years, starting in 2023.	An internet Cadet Safety Programme has been designed and SJAI are now in the stream of identifying internal trainers and upskilling same for course delivery.
9B	All members undergo the SJAI safeguarding training, the Children First e-Learning programme and are vetted by An Garda Síochána before being accepted for membership.	Our safeguarding team will continue to monitor this training with assistance from the Enterprise Management System.	Ongoing continuous training renewed every 3-years for all members is monitored and tracked, with members who are not compliant stood down from SJAI activities.
9C	Members are already required to have completed Garda vetting, the Children First e-learning certificate, and SJAI safeguarding training within their third year.	Our safeguarding team will ensure that non-compliant members are stood down from all activities until any issues are rectified.	Active engagement and monitoring in place  All 3 certifications are required to commence activity in SJAI and must be kept current on a 3-year renewal basis, otherwise the volunteer is stood down from all SJAI activities.



# **RECOMMENDATION 10:**

# **GARDA VETTING**

**10A** - All adults within SJAI must receive vetting from the Garda National Vetting Bureau under the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016.

**10B** - Applications for membership of SJAI must not be considered to be complete until the conclusion of Garda vetting.

**10C** - Cadets who approach their 18<sup>th</sup> birthday must be vetted before joining the relevant adult division or branch.

# **COMMITMENT:**

SJAI is fully committed to ensuring that all adults within SJAI have the appropriate Garda vetting, the appropriate Tusla online safeguarding training certification, and have undertaken bespoke SJAI safeguarding training <u>before</u> they can become an active participant in SJAI and have any cadet interactions whatsoever.



10A	Adults looking to join SJAI are required to receive vetting from the Garda National Vetting Bureau under National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016.  Members are automatically stood down from active service if safeguarding compliance is not renewed by the third anniversary of Garda Vetting being issued.  We are aligning the dates on each member's St. John PIN (Personal Identification Number) card, with the dates marking their completion of garda vetting and child safeguarding training. This will allow any supervisor to ensure a member presenting with an in-date PIN has, by definition, their Garda vetting and child safeguarding training also in date.	We will ensure that the new Enterprise Management System – Traumasoft – is used to its full potential to ensure implementation of the child protection and garda vetting requirements is more integrated than was the case in the past.	SJAI has migrated to Traumasoft, our integrated management system.  Here all members are listed uniquely to the division they are members of and their data is securely held.  Authorised users either have access privileges at a local, regional, and national level to ensure those who are compliant can partake in SJAI activities, those who are not, are stood down from active service until they become compliant.  Traumasoft now gives SJAI and its key users one source of organisational data and is further endorsed by copies of certificates and disclosure documents which will be now uploaded to Traumasoft.  The vetting disclosures are only accessible to the Garda Vetting team and where appropriate are escalated to the Disclosures Review Group.  Traumasoft users will be continually supported on how they can use the system and the built-in tools such as reporting.  Together these steps help complete our vetting system and ensure key members have access to vetting data, ensuring all adults are vetted



WE WILL	(as at March 2023)	PROGRESS (since March 2023)	with the National Vetting Bureau.  We have introduced a new six-stage Adult Volunteering Process (AVP) which integrates with Traumasoft.  This process is in place for all new members and will be developed further in consultation with members and external support.
			Bureau.  We have introduced a new six-stage Adult Volunteering Process (AVP) which integrates with Traumasoft.  This process is in place for all new members and will be developed further in consultation with members
			We have introduced a new six-stage Adult Volunteering Process (AVP) which integrates with Traumasoft.  This process is in place for all new members and will be developed further in consultation with members
			six-stage Adult Volunteering Process (AVP) which integrates with Traumasoft.  This process is in place for all new members and will be developed further in consultation with members
			six-stage Adult Volunteering Process (AVP) which integrates with Traumasoft.  This process is in place for all new members and will be developed further in consultation with members
10B not consi until the Garda ver online sattraining a	hip of SJAI are dered complete conclusion of tting, Tusla feguarding	We will continue not to allow any applicant for membership to have Cadet interactions until the Garda vetting and safeguarding training have been successfully completed.	This provides SJAI with the first opportunity to streamline a process with our integrated management system, Traumasoft.  Some elements of this process include application, validation of identity and interview, reference checks and discussion on our safeguarding policy.  Following a successful interview at stage one, the prospective member is entered on Traumasoft.  This gives SJAI the visibility of a prospective members journey as soon as they pass interview and enter the organisation.



	WE WILL (as at March 2023)	PROGRESS (since March 2023)	WE HAVE (as at March 2023) and will contribute to an effective compliance enforcement system for Garda vetting in the organisation.
10C	We have required that all cadets transferring to the adult SJAI on their 18 <sup>th</sup> birthday must be vetted before joining the relevant adult division.  For several years, we have discontinued the practice whereby cadets could transfer to the adult section of SJAI between the ages of 16-18, and now do not allow such transfer until the cadet is 18 years of age.	We will continue to require that all cadets transferring to the adult SJAI must be vetted before joining the relevant adult division.  We will continue to only allow cadets transfer to the adult SJAI upon reaching their 18 <sup>th</sup> birthday.	We will continue to only allow cadets transfer to the adult SJAI upon reaching their 18 <sup>th</sup> birthday and completion of Garda Vetting.



# **RECOMMENDATION 11:**

### MAINTAINING BEST PRACTICE ON A CONTINUING BASIS

- **11A** The Review believes that SJAI is now committed to robust implementation of child safeguarding practices and procedures. The recommendations made by the Review are designed to further enhance the present safeguarding regime in SJAI, such that insofar as is possible, SJAI offers an environment in which children can safely participate, learn and grow.
- 11B The Review believes that SJAI is now alive to its safeguarding obligations and remains committed to putting the safety and well-being of its cadet membership at the top of its priorities and to resource its child safeguarding work accordingly.
- **11C** The Review sees a clear distinction between SJAI in the past and today in terms of the central importance it places on living out its child safeguarding obligations and responsibilities. It is essential that complacency never sets in, in this regard, as child safeguarding requires organisational vigilance at all times.
- 11D SJAI has revised its child protection policies on an interim basis since their first publication in 2002. However, the general regulations of SJAI have remained largely unchanged since 1947. As part of good governance, these should be considered as a whole, ensuring that they comply with 21<sup>st</sup> century standards and regulations. This should include data protection and child safeguarding, as well as a general review of governance structures.
- **11E** SJAI must maintain a culture of being proactive in child safeguarding. Best practice in safeguarding of children and regulations will continue to develop. SJAI must ensure that it does not lag behind in implementation of changes in practice and that it stays informed of changes to regulatory regimes. Guidance should be given having regard to Children First as it develops as well as further relevant publications of the Child and Family Agency, Tusla.
- 11F SJAI must also adopt practices of awareness of developments and changes in data protection and privacy, in conjunction with proper and accountable record keeping.

# **COMMITMENT:**

SJAI is fully committed to robust implementation of child safeguarding practices and procedures and will enhance capacity in this area through the recruitment of a professionally qualified national safeguarding officer to assist in this work. We will never be complacent about child safeguarding, and are fully committed to maintaining best practice on a continuous basis.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
11A	We have existing safeguarding practices and procedures in place in SJAI, which are compliant with Children First and are rigidly enforced.	We will enhance implementation of child safeguarding practices and procedures through the recruitment of a professionally qualified national safeguarding officer to assist in this work.	Full review with support of the compliance section of Tusla, has been completed.
11B	We have a dedicated safeguarding team which reports directly to the commissioner of SJAI and onwards to the Board of SJAI.	We will ensure that today and going forward SJAI remains fully alive to our safeguarding obligations and remains committed to putting the safety and well-being of our cadet membership at the top of our priorities and to resource our child safeguarding work accordingly.	Full team in place, with expansion to regional safeguarding leads, and the introduction of a Safeguarding Lead.
11C	We have endeavoured to place a central importance on living out our child safeguarding obligations and responsibilities, avoiding complacency ever setting in.	We will ensure child safeguarding obligations and responsibilities remain central in our work and that complacency never sets in, remaining vigilant at all times, all enhanced by the appointment of a professional safeguarding officer on the staff complement of SJAI headquarters.	Continued revision of policy, ongoing training, and compliance audits for practice have started.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
11D	We have revised and updated our child protection policies in conjunction with Tusla.	We will make our Children First and safeguarding obligations and commitments unequivocal in our revised operational rules and regulations, which we will have completed before the end of the year.  Our Children First and safeguarding obligations and commitments will also be central to our cadet management handbook.	Full review completed in consultation with Tusla.
11E	For several years we have placed a culture of being proactive in child safeguarding at the centre of how we operate.  We have maintained a strong working relationship with key personnel in Tusla for advice and guidance on an ongoing basis.	Revision of the rules and regulations will be done in a manner that ensures they comply with 21st century standards, including in the areas of data protection and child safeguarding.  We will continue to maintain a culture of being proactive in child safeguarding acknowledging that best practice in this area continues to develop, and, in this regard our employment of a national safeguarding officer will augment our existing resources to assist us remain fully up-to-date on best practice.  SJAI will continue to maintain close working relations with the statutory authorities, most particularly, Tusla.	As outlined across, SJAI and those with Safeguarding roles remain fully committed to keeping themselves upto-date on developments on safeguarding polices, practices and procedures in Ireland on an ongoing, dynamic basis.  This capacity will be significantly assisted by the recruitment of the new, professionally-qualified Safeguarding Lead.



	WE HAVE (as at March 2023)	WE WILL (as at March 2023)	PROGRESS (since March 2023)
11F	Within the safeguarding team there is a keen awareness of our data protection and privacy obligations, in conjunction with proper and accountable record keeping practices.	We will enhance our capacity to ensure we are maintaining practices of awareness in developments and changes in data protection, privacy and record keeping, through the employment of a new, professionally qualified, national safeguarding officer among our NHQ staffing complement.	SJAI has a dedicated Data Protection Officer with whom the Safeguarding team can liaise when necessary.  Safeguarding record- keeping fully recognises GDPR obligations noting, as the Independent Review does, that Child Safeguarding obligations always supersede Data Protection requirements.



# **COMMISSIONER'S CONCLUSION**

The publication of Dr Geoffrey Shannon SC's report on the handling of past complaints of abuse at St John Ambulance Ireland (SJAI) remains a landmark moment for the organisation. The report's findings were critical to uncovering the truth regarding the handling of past complaints of abuse at the organisation, and, equally, ensured that our ongoing determination to implementing the recommendations that have been made will ensure robust Safeguarding for all who engage with SJAI.

On reading our latest response document update, I hope that you are assured that we are doing everything possible to ensure everyone entrusted to our care is safe. Securing the appointment of an Independent Safeguarding Lead, reporting directly to the Board, is a key additional resource that will assist SJAI operate to the highest standards in Safeguarding.

Once again, as Commissioner, I wish to assure our members and the broader public that the culture that allowed abuse to be perpetrated in our organisation in the past is no longer present within our organisation. In line with our Children First obligations, we continue to prioritise best practice safeguarding guidelines and principles. As I have noted before, the Independent Review has served to strengthen our ability to provide a safe environment for all children, especially our volunteers, as well as recipients of our voluntary aid services, but consistent implementation and oversight remains essential.

As an organisation, we remain fully committed to continuously improving our standards, so that our safeguarding policies are in line with best practice at all times. This is a dynamic process, where we are learning all the time, and so we are committed to continuously reviewing and updating our safeguarding policies and procedures as new understandings emerge, in consultation with external experts.

I would also like to, once again, acknowledge the victims who have spoken out about their abuse either publicly or through the Independent Review process. They continue to be both commended and admired for their bravery as they continue to cope with what was visited upon them while volunteering with St. John Ambulance Ireland. We thank them once again for helping to uncover these issues and apologise sincerely for the hurt they have endured. We hope that each can access the counselling supports as and when each is ready to so do.

### **John Hughes**

Commissioner St John Ambulance Ireland June, 2024