



**Child Safeguarding
& Protection Service**

**Vulnerable Adult
Safeguarding Policy of the
Archdiocese of Dublin
August 2025**

Archdiocese of Dublin

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FOREWORD

I welcome this Vulnerable Adult Safeguarding Policy as an expression of our pastoral commitment to those whose lives have been marked by challenges and adversity. Our recognition of their very special place in our Diocese is expressed in many ways, for example, in the devoted care provided by the chaplains, doctors, nurses, other volunteers and, not least, by the young people from schools in the Diocese who travel to Lourdes every year to care for the sick pilgrims who are at the very heart of the annual Dublin Diocesan Pilgrimage to Lourdes.

In his Apostolic Letter *Vos Estis Lux Mundi*, Pope Francis called for a “continuous and profound conversion of hearts” in response to the crimes of sexual abuse that have offended Our Lord and caused immense damage to victims and to the community of the faithful. This change of heart, Pope Francis wrote, must be “attested by concrete and effective actions that involve everyone in the Church, so that personal sanctity and moral commitment can contribute to promoting the full credibility of the Gospel message and the effectiveness of the Church’s mission”. This policy describes concrete and effective actions we need to take to ensure the safety and protection from harm of vulnerable adults in our parishes and diocesan agencies.

I take this opportunity to express my appreciation to all those who work for and on the behalf of the Diocese to make our parishes safe and welcoming places for all, most especially for children and vulnerable adults. In particular, I wish to thank the members of our diocesan Safeguarding Committee for their careful deliberations on the contents of this policy.

I commit all of those who work for and on behalf of the Archdiocese of Dublin to the implementation of this policy.



+Dermot Farrell

Archbishop of Dublin

August 2025

CHAPTER 1: SAFEGUARDING VULNERABLE ADULTS IN THE ARCHDIOCESE OF DUBLIN – A SUMMARY INTRODUCTION

What this document contains

Chapter 1 introduces the policy, outlines its scope and defines key terms, including 'vulnerable adult', 'safeguarding' and 'abuse' and provides information on where people should go if they need advice and assistance.

Chapter 2 describes the safeguarding structure of the Archdiocese of Dublin, that is, who is responsible for what when it comes to safeguarding and the protection of vulnerable adults from abuse.

Chapter 3 is about all the things we do in the Diocese to ensure that our parishes are safe and welcoming places for all, including children and vulnerable adults.

Chapter 4 provides direction on what requires to be done when a concern arises for the safety or well-being of a vulnerable adult.

There are four appendices which supplement the information given in the chapters.

What is vulnerable adult safeguarding?

Vulnerable adult safeguarding in the Archdiocese of Dublin consists of a set of principles and practice guidelines that inform our dealings with all of those we meet in the course of our ministry for or on behalf of the Diocese, and describes how we recognise and respond to concerns that a vulnerable adult has been abused, is being abused or is at risk of abuse.

Why do we need a policy to safeguard vulnerable adults in the Archdiocese of Dublin?

1. By following good practices in our parishes and diocesan agencies we create a safer environment for all adults.
2. We need to be alert to threats to the safety and well-being of vulnerable adults that arise within our parishes and diocesan agencies and know how to respond to them.
3. We have a responsibility to the vulnerable adults that we come across in the

course of our ministry. These may be people who are at risk in their own families or communities and it is important that we know how to respond when we believe that they have been abused or are at risk of abuse.

What is a vulnerable adult?

For the purposes of this policy document a vulnerable adult is a person over 18 who lacks or has seriously impaired capacity either to make informed decisions or to defend him or herself from harm.

An adult can be vulnerable at one time in his or her life but not at another time. For example, a person who is going through an acute psychotic episode is highly likely to fit the definition of a vulnerable adult but this will need to be reassessed once the acute phase of the illness has passed.

A person can find herself in a situation where she feels vulnerable, for example, following a bereavement or an accident. However, provided that she retains capacity to make decisions and defend herself, she does not fit the definition of a vulnerable adult.

How will I know whether a person fits the definition of a 'vulnerable adult'?

People with severe intellectual disabilities or those in advanced stages of dementia will generally be considered 'vulnerable adults'. In other cases, it may not be clear. A frail older person living alone might be considered vulnerable but still retain capacity to make decisions. We have to find a balance between protecting people from harm and respecting their personal autonomy.

In situations where there is any concern that someone who may be a vulnerable adult is at risk or is currently experiencing abuse it is important to seek advice from the Child Safeguarding & Protection Service (CSPS) or the HSE.

Am I obliged to report the abuse of a vulnerable adult?

The Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act, 2012 makes it an offence to withhold information from the Gardai about certain types of offences against 'vulnerable persons' (as well as children). These offences include assault causing harm, sexual assault, rape, incest and trafficking. A 'vulnerable person' is defined as an adult:

a) who –

(i) is suffering from a disorder of the mind, whether as a result of mental illness or dementia
or

(ii) has an intellectual disability,
which is of such a nature or degree as to severely restrict the capacity of the person to guard him or herself against serious exploitation or abuse, whether physical or sexual, by another person, or

b) who is suffering from an enduring physical impairment or injury which is of such a nature or degree as to severely restrict the capacity of the person to guard himself or herself against serious exploitation or abuse, whether physical or sexual, by another person or to report such exploitation or abuse to the Garda Síochána or both.

The HSE's Draft Adult Safeguarding Policy (2019) provides for reporting of concerns for the protection of vulnerable adults¹ to regionally based Safeguarding and Protection Teams and the contact details for these teams are given in Appendix 1 of this document.

Where do I go to for advice and support?

Deirdre Donnelly (deirdre.donnelly@dublindiocese.ie) and Andrew Fagan (andrew.fagan@dublindiocese.ie) of the Child Safeguarding & Protection Service can be contacted in relation to concerns for the safety and welfare of vulnerable adults. Advice on training and compliance matters is available from Garry Kehoe (garry.kehoe@dublindiocese.ie).

The contact details are: **Child Safeguarding & Protection Service, Diocesan Offices, 20–23 Arran Quay, Dublin 7, DO7 XK85, 01 8360314**

The HSE's regionally based Safeguarding and Protection Teams are available to offer advice on how to deal with concerns for the safety and welfare of vulnerable adults. The contact details for these teams are given in Appendix 1 of this document.

Balancing rights and needs

Vulnerable adults are holders of rights and ought not to be seen simply as persons in need to protection. It is important in our work with vulnerable adults that we do not impinge on their rights in our efforts to protect them from harm. The internationally

¹ The HSE Draft Policy uses the term 'adult at risk of abuse' in preference to 'vulnerable adult' but with a similar definition to that given above.

recognised FREDa framework provides a set of overarching principles that should guide our practice. These principles are:

- Fairness
- Respect
- Equality
- Dignity
- Autonomy

Key terms

Safeguarding² refers to the measures that are put in place to reduce the risk of harm, to promote and protect people's human rights and their health and well-being, and to empower people to protect themselves.

Abuse is a single or repeated act or omission which violates a person's human rights or causes harm or distress to a person.

Harm in this context is understood as the damage caused by abuse.

The **civil authorities** referred to in this document are the Health Service Executive (HSE) and An Garda Síochána. These authorities have different responsibilities in relation to the protection of vulnerable adults. The HSE assesses risk, manages cases and advises on the implementation of appropriate protective measures. An Garda Síochána investigates alleged crimes and then refers cases to the Director of Public Prosecutions who decides on prosecution.

Implementation

The Child Safeguarding & Protection Service of the Archdiocese of Dublin will assist parishes and diocesan offices in the implementation of this policy by: publicising it; providing information and training sessions; and offering advice and support to members of parish teams.

Review

This policy will be reviewed by the Child Safeguarding & Protection Service in cooperation with the diocesan Safeguarding Committee and updated as necessary to take account of any developments in law or practice.

² The definitions of safeguarding and abuse are taken from the National Standards for Adult Safeguarding (HIQA and MHC, 2019)

CHAPTER 2: THE SAFEGUARDING STRUCTURES OF THE ARCHDIOCESE OF DUBLIN

The Archbishop of Dublin has overall responsibility for ensuring that there are adequate safeguarding arrangements in place to ensure that those who participate in the activities of the Catholic Church in the Archdiocese of Dublin are protected from harm. A number of structures and post holders assist the Archbishop in this task.

The Child Safeguarding & Protection Service (CSPS)

The CSPS was initially established as the Child Protection Service (CPS) in 2003 in response to an identified need for a cohesive and effective support service for those who had experienced abuse in childhood by clerics, and for their families, and for a proper system for the monitoring, supervision and support of those clerics against whom allegations of child sexual abuse had been made and who were out of ministry as a consequence. The remit of the service was subsequently extended to include vulnerable adults and to ensure that all who volunteer or minister within the Diocese adhere to this policy.

The primary objective of the CSPS is the safeguarding and protection from abuse of children and vulnerable adults who participate in the life and work of the Catholic Church in the Archdiocese of Dublin.

The service has three functions that relate to this policy. These are:

1. Creating and maintaining safe environments for children and vulnerable adults who participate in Church activities. This is done through:

- providing safeguarding training and advice to diocesan and parish personnel,
- developing materials to assist parishes and diocesan organisations in creating safe environments,
- processing vetting applications on behalf of parishes and diocesan offices for those who require to be vetted in accordance with the National Vetting Bureau (Children and Vulnerable Persons) Act 2012;
- carrying out audits of parishes to ensure they are operating in compliance with the requirements of diocesan safeguarding policy.

2. Providing a support service to those affected by abuse. This is a service provided to those who have experienced abuse in a Church context and to members of their family. The service provided consists of:

- facilitating people to make complaints about abuse,
- accessing counselling for those who need and want it,
- informing them of the steps being taken to address their concerns,
- providing ongoing support in accordance with their needs and wishes.

3. Case management. The management of child and vulnerable adult protection concerns³ relating to clerics of the Diocese and oversight of the management of such concerns as they relate to other diocesan personnel. This involves a range of activities including:

- meeting with those who wish to discuss such concerns,
- meeting with the respondent (the cleric against whom the allegation has been made),
- notifying the civil authorities (An Garda Síochána and Tusla or the HSE),
- advising the Archbishop on protective measures,
- ensuring that appropriate measures are taken to prevent any person who has offended against children or vulnerable adults from doing so again.

In addition the CSPS:

- Provides advice and assistance to parishes and diocesan agencies in their management of child and vulnerable adult protection concerns and
- Oversees practice in parishes and diocesan organisations in order to ensure they are fully compliant with both church and national (state) safeguarding laws, policies and guidelines.

Under the direction of, and reporting to the Archbishop, the Office is currently made up of a team of six people.

The team consists of the:

- Director, who has overall responsibility for the service;
- Safeguarding & Support Officer, who manages cases and provides support to those affected by abuse;
- Priest Delegate, who coordinates the relationship between the Diocese and the

³ Child and vulnerable adult protection concerns are concerns that a child or vulnerable adult may have been, is being, or is at risk of being abused or neglected.

respondent, that is, the cleric against whom an allegation of abuse has been made,

- Training & Compliance Manager, who coordinates and delivers safeguarding training in the Diocese, provides advice and support on all aspects of safeguarding, and monitors compliance with diocesan safeguarding policy;
- Garda Vetting Coordinator, who processes Garda vetting applications on behalf of the diocesan offices, parishes and affiliated organisations;
- Administrator, who manages the offices of the service.

CSPS operates out of the Diocesan Offices, 20–23 Arran Quay, Dublin 7, D07 XK85, 01 8360314. Contact details for all team members are available on: <https://csps.dublindiocese.ie/contact-us/>

The Diocesan Safeguarding Committee

This committee was established in 2013. It advises the Archbishop on the creation and maintenance of safe environments for children and vulnerable adults in the parishes and diocesan agencies of Dublin Diocese. It has a particular focus on ensuring that diocesan safeguarding policy is implemented across all of the 197 parishes in the Diocese. Its membership comprises clerics, religious and lay members. It is chaired by a lay person.

The Respondent Supervision and Support Committee (RSSC)

The Respondent Supervision and Support Committee brings together the Archbishop and the Moderator of the Curia (who chairs the Committee) with personnel from the Child Safeguarding & Protection Service, the Chancellery, the Office for Clergy and an independent external safeguarding expert. The committee monitors the diocesan response to clergy against whom a complaint, allegation or concern has been expressed. The committee meets approximately every two months to ensure that these men are given adequate support and that the arrangements for their monitoring and supervision are operating to effectively minimise the risk of abuse.

The Designated Liaison Person (DLP)

The DLP is a person who has specific responsibility for ensuring that effective procedures are followed within the Diocese when dealing with child and vulnerable adult protection concerns.

The DLP for the Archdiocese of Dublin is the Director of the CSPA and the Safeguarding and Support Officer is the Deputy DLP. All child and vulnerable adult protection concerns that relate to Church personnel and activities in the Archdiocese of Dublin must be reported to the DLP or Deputy DLP who have the overall responsibility, entrusted to them by the Archbishop, to ensure that each child and vulnerable adult protection concern is correctly managed from start to finish.

Diocesan Safeguarding Trainers

The Training and Compliance Manager has overall responsibility for implementing diocesan safeguarding training policy. He is assisted by a team of trained and accredited volunteer trainers.

Parish Safeguarding Representatives

Each parish in the Diocese is required to appoint a Safeguarding Representative and it is recommended that there are two or more. The Safeguarding Representative is responsible for the promotion of best practice and compliance with diocesan safeguarding policy at parish level. Each of these Representatives is trained for the role. The CSPA maintains regular contact with the Safeguarding Representatives.

Communicating the Diocese's Safeguarding Message

The Diocese produces a leaflet that explains the work of the CSPA and gives information on support services for those who have been abused in a Church context.

The CSPA has its own website, www.csps.dublindiocese.ie, which can be accessed directly or through the diocesan website, www.dublindiocese.ie. It provides information on the service, the team, relevant policies and procedures (including this one) and information on support services.

The CSPA produces a Newsletter which is distributed to parishes and safeguarding representatives and is also available on the website. It provides an update on the work of the CSPA and highlights current issues of relevance to safeguarding and the support of those who were abused in a Church context.

Many parishes have their own websites that provide safeguarding information, along

with the name/s and contact details of the parish's own safeguarding representative/s and links to the diocesan website. Information about child safeguarding and protection is regularly included in parish newsletters and, in some parishes, the safeguarding representative speaks about his/her work at Mass on an occasional basis.

Since 2013, the Diocese has held an annual Safeguarding Day during which parishes are encouraged to draw attention to the work that is being done at parish and diocesan level to encourage the participation of children and vulnerable adults in Church activities. Safeguarding Day has now become an established part of the diocesan calendar and takes place on the fourth Sunday in September each year.

CHAPTER 3: THE CREATION AND MAINTENANCE OF SAFE ENVIRONMENTS

3.1 Policy Statement

The Archdiocese of Dublin is committed to safeguarding as an integral component of the life and ministry of the Catholic Church in Dublin and recognises a particular responsibility for the protection from harm of vulnerable adults. All vulnerable adults are encouraged to participate fully in the life of the Church in Dublin in accordance with their wishes.

All those who minister or work in parishes whether as clerics, religious, employees or volunteers are required to behave towards all persons with whom they come in contact within a Church context in a manner that upholds their value and dignity as human persons. They must:

- avoid any behaviour that constitutes abuse or could be reasonably interpreted as abuse,
- take responsibility for ensuring that appropriate boundaries are maintained in their dealings with people to whom they minister,
- contribute to a culture of safeguarding by being transparent and accountable in their practice and by calling others to account for their actions in a constructive and respectful manner.

In addition, those who minister or work in parishes whether as clerics, religious, employees or volunteers recognise their responsibility for vulnerable adults in the community and commit to equipping themselves, through training and other means, with the knowledge required to identify concerns for their protection and welfare and to report these, where appropriate, to the relevant authorities. This extends to work undertaken outside of Dublin and Ireland as, for example, when participating in pilgrimages.

The Archdiocese of Dublin does not tolerate the abuse of vulnerable adults by those who act on behalf of the Diocese. Adherence to this policy is supported by robust procedures described below and by the provision of training to diocesan personnel who work with vulnerable adults.

3.2 Code of Practice

The *Archdiocese of Dublin: Standards and Guidelines for Priestly Life and Ministry* recognises that priests are often invited into people's lives at sensitive and important moments "when people may be more vulnerable than usual" and that "great sensitivity, therefore, is required in ministering effectively and appropriately". Care for others precludes any behaviour which could reasonably be interpreted as harassment. Harassment is defined as encompassing a "broad range of behaviours, including but not limited to physical, verbal, written or psychological abuse, bullying, racial and religious insults, derogatory ethnic slurs, sexual jokes and comments, requests for sexual favours, display of pornographic materials. Harassment can occur as a result of a single incident or a pattern of behaviour where the purpose or effect is to create a hostile, offensive, humiliating or intimidating environment".

Priests, according to these guidelines, are obliged to always act in the interests of those they serve, to take responsibility for managing boundary issues and for being accountable for any violations of such boundary issues as may occur.

These principles hold good for all who work for or on behalf of the parishes of the Diocese.

Those who work in parishes must be accountable and transparent in their dealings with others. Accountability, in this context, means being willing to give an account and explanation of their actions, including their reasons for choosing to do things in a particular way rather than in any of the available alternative ways. Transparency is about operating in safe environments, ones where there is openness and visibility. A culture of safeguarding and, therefore, a safe environment, obtains when accountability and transparency operate horizontally and as well as vertically. In other words, members of the parish team are accountable to each other, not just to the parish priest or leader of the particular activity or group they are involved in.

Those working with vulnerable adults for or on behalf of the Diocese in its parishes commit to:

- treating all people with justice, courtesy and respect;
- encouraging every person to contribute to the parish in accordance with their wishes and interests;
- learning appropriate means of communicating with those with whom they come in contact in the course of their ministry, taking account, in so far as is practicable, of any communication challenges people may have by virtue of

- disability, infirmity or limited knowledge of the English language;
- listening to and demonstrating respect for the views of all people, taking account of their particular background and experiences;
- respecting each person's personal boundaries;
- assisting people to develop their own sense of their rights and their responsibilities to others;
- developing a culture where people can speak openly about anything that may be worrying them;
- operating in accordance with this policy and national guidelines;
- challenging and reporting abusive or potentially abusive behaviour;
- maintaining confidentiality with respect to sensitive information and being aware of the limits of confidentiality when dealing with vulnerable adult protection concerns (see Appendix 4);
- working cooperatively with colleagues;
- reporting any concerns of abuse in accordance with this policy;
- the appropriate use of social media and communication and reporting any concerns regarding these.

Those working for or on behalf of the Diocese will not:

- engage in any form of bullying or harassment (as defined above);
- have a sexual or otherwise inappropriate or exploitative relationship with any person to whom they are ministering;
- accept gifts of money (for personal use) or objects of substantial value;
- photograph/video another person, even by mobile phone, without their consent;
- present for ministry under the influence of alcohol or illegal substances.

Breaches of Code of Practice: Any person who has a question or is concerned about a possible breach of this code of practice should discuss the matter with the Child Safeguarding & Protection Service.

3.3 Obtaining consent for the involvement of vulnerable adults in parish activities

- For those adults who have capacity to give consent the process of becoming involved in parish activities is the same as for any other adult. If there is a concern about the person's capacity to give consent, the advice of CSPS should be sought.
- Information should be provided, including a description of the activity or outing,

those organising it, and the contact details for a responsible person who can be contacted, if necessary, by the family member, carer or advocate.

- The organisers should obtain an emergency contact number for a family member, advocate or carer of the vulnerable adult.
- Information should be obtained on any specific dietary requirements, medical or other needs.
- Consent should be obtained for inclusion in films, photographs or video recordings.

Trips and outings: All of the matters mentioned in the previous section apply when organising trips and outings, and the following should also be taken into account when organising trips and outings for vulnerable adults:

- All trips, including day trips, overnight stays and holidays, need careful advance planning, including adequate provision for safety in regard to transport, facilities, activities and emergencies. Adequate insurance should be in place.
- A copy of the itinerary and contact telephone numbers should be made available to family members/carers/advocates of vulnerable adults.
- Particular attention should be given to ensuring that the privacy of vulnerable adults is respected when they are away on trips.
- The provision of appropriate and adequate sleeping arrangements should be ensured in advance of the trip.
- There should be separate male and female sleeping areas for single persons.
- There should be a named person (such as the activity organiser or leader) to whom all concerns and complaints are referred and all such concerns and complaints should be followed up in a timely and efficient manner.

Further advice regarding risk assessment and risk management when planning events or activities for vulnerable adults is available from the Child Safeguarding & Protection Service.

3.4 Recruitment

Clerics (priests and deacons) of the Diocese are required to:

- Complete a written application form,
- Provide references that are followed up through direct contact with referees,
- Undergo psychological evaluation,
- Undergo a period of discernment, training and formation, usually of 6 to 7 years duration.

Religious who work in the Diocese undergo similar selection, recruitment and training.

Parish pastoral workers employed by the Diocese undergo similar processes though the training is of shorter duration.

The employment of other staff in parishes and diocesan agencies is carried out in accordance with the Diocese's HR policies and procedures which includes written applications, references, and, for some positions, psychological evaluation.

The recruitment of volunteers is a less formal process but the parish is required to take appropriate steps to ensure that anyone who represents a risk to the safety of children or vulnerable adults does not use the church as a means of getting access to them.

- Volunteers should be asked to complete a basic form so that there is a written record of their names and contact details, which should then be entered on the parish volunteer register;
- Candidates should be assessed for their suitability for the role in question;
- Candidates for a position involving ministry with vulnerable adults should be given a copy of, and asked to sign an undertaking to comply with, the code of practice (see page 14);
- Candidates for roles with specific responsibility for vulnerable adults should be requested to provide the names of two referees.

Safeguarding training: Attendance at a safeguarding information session is mandatory for all those who minister in the Diocese whether as clerics, religious, employees or volunteers irrespective of whether or not they have a specific role with vulnerable adults or children or not.

Garda vetting: All those who minister to children and vulnerable adults (as defined in the legislation) on behalf of the Diocese and its parishes whether as clerics, religious, employees or volunteers must be Garda vetted. Vetting is one among a range of safeguards and not necessarily the most important one. However, it acts as a deterrent to those who are a danger to vulnerable adults from using the Church to get access to them.

Instructions on completing a vetting application and the application form are available at <http://csps.dublindiocese.ie/category/garda-vetting/>.

Vetting application forms are also available from: Vetting Coordinator, Child Safeguarding & Protection Service, Diocesan Offices, 20–23 Arran Quay, Dublin D07 XK85. Phone: 01 8360314

CHAPTER 4: DEALING WITH CONCERNS FOR THE PROTECTION OF VULNERABLE ADULTS

This chapter provides guidance on recognising and responding to the abuse of vulnerable adults.

4.1 Recognition

In order to be able to recognise abuse, we must understand the different forms of abuse to which vulnerable adults are likely to be exposed and the indicators of such abuse.

Type of Abuse	Examples of Indicators
Physical: The use of physical force, the threat of physical force or mistreatment of one person by another which may or may not result in actual physical harm or injury.	Unexplained injuries-bruises/cuts/burns; unexplained or long absences from a residential placement/home; appearing frightened/avoiding a particular person; asking not to be hurt.
Sexual: Any behaviour (physical, psychological, verbal, virtual/online) perceived to be of a sexual nature which is controlling, coercive, exploitative, harmful or unwanted towards another person.	Trauma to genitals, breast, rectum, mouth, injuries to face, neck abdomen, thighs, buttocks, STIs and human bite marks. Behaviours which are unusual for that person e.g. disturbed sleep/incontinence/aggression/changes to eating patterns/unusual sexual behaviour/anxiety attacks.
Emotional/Psychological (including bullying/harassment): Behaviour that is psychologically harmful to another person and which inflicts anxiety or mental distress by threat, humiliation or other verbal/ non-verbal conduct.	Mood swings, incontinence, obvious deterioration in health, sleeplessness, feelings of helplessness/hopelessness, extreme low self-esteem, tearfulness, self-abuse or self-destructive behaviour. Challenging or extreme behaviour.

Financial/Material: The unauthorised and improper use of funds, property or any resources including pensions, or others' statutory entitlements or benefits. Financial abuse involves an act or acts where a person is deprived of control of their finances or personal possessions or is exploited financially by another person or persons.	Lack of control over personal funds or bank accounts; misappropriation of money, valuables or property; lack of records or records incomplete regarding spending; forced changes to wills; not paying bills; refusal to spend money; insufficient money for day-to-day expenses.
Institutional: The mistreatment of people brought about by poor or inadequate care or support or systemic poor practices that affect a whole care setting.	Lack of or poor quality staff supervision and management. High staff turnover. Lack of training of staff and volunteers. Poor staff morale. Poor record keeping. Poor communication with other service providers. Lack of personal possessions and clothing, being spoken to inappropriately.
Neglect: The withholding of or failure to provide appropriate and adequate care and support which is required by another person. It may be through a lack of knowledge or awareness, or through failure to take reasonable action given the information and facts available to them at the time.	Poor personal hygiene, dirty and dishevelled in appearance e.g. unkempt hair and nails. Poor state of clothing; non-attendance at routine health appointments; socially isolated.
Discriminatory: Unequal treatment, harassment or abuse of a person based on age, disability, race, ethnic group, gender, gender identity, sexual orientation, religion, family status, or membership of the Travelling community.	Isolation from family or social networks. Indicators of psychological abuse may also be present.
Online or digital abuse: An abusive or exploitative interaction occurring online or in a social media context.	Becoming withdrawn, anxious, clingy, depressed, aggressive, changes in behaviour, problems sleeping and eating disorders.

Human Trafficking/ Modern Slavery: The acquisition and movement of people by improper means, such as force, threat or deception, for the purposes of exploiting them. It can take the form of domestic servitude, forced criminality, forced labour, sexual exploitation and organ harvesting.	People believing that they must work against their will, unable to leave their work environment or showing signs that their movements are being controlled. Fear, anxiety, signs of injuries that appear to be the result of assault
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(Adapted from: *Final Draft, HSE Adult Safeguarding Policy (2019)*).

The context of abuse

Abuse can happen anywhere and anyone can be an abuser, including those normally expected to love or care for vulnerable adults.

- Familial abuse is the abuse by a family member such as partner, son, daughter or sibling.
- Peer abuse is the abuse of one adult by another adult, typically occurring within a care setting, such as a nursing home.
- Professional abuse is the misuse of power and abuse of trust by a professional and includes such things as entering into an inappropriate relationship with a vulnerable adult or failing to refer a disclosure of abuse to the appropriate authorities.

Abuse by a stranger is also a possibility.

Finding out that abuse has occurred or may have occurred

There are a number of ways in which concern that a vulnerable adult is being abused, has been abused or is at risk of abuse might arise.

- The person may disclose abuse.
- It may be witnessed by someone else.
- The person may show some signs of physical injury for which there appears to be no credible or satisfactory explanation.
- The person's demeanour/behaviour may cause a suspicion that something is not right.
- Worries or anxieties may be expressed by someone close to the person (friend, neighbour, relative).

Being alert to possible abuse plays a significant role in ensuring that vulnerable adults are protected. It is important that all concerns about possible abuse of vulnerable adults are followed up.

4.2 Response

Disclosures of abuse: If a person asks to speak to you in confidence it is a good idea to tell them that, while you wish to assist them, there are certain kinds of information, including disclosures of abuse, that have to be shared with certain other people. This allows the person to make an informed choice about whether or not to make a disclosure to you. The person may decide to go ahead and make the disclosure or they may have already embarked on doing so before you have had the chance to explain the limits of confidentiality.

Where a vulnerable adult discloses abuse to a cleric, parish employee or volunteer, it is important that the person hearing the disclosure should:

- Explain that information relating to the person's protection and welfare ought to be shared, though only with those who need to know it to protect the person and/or other vulnerable adults, and seek the person's consent to share the information disclosed;⁴
- Stay calm and listen carefully, expressing concern and sympathy;
- Ask questions for the purposes of clarification only;
- Allow the person to tell the story in their own words and at their pace;
- Reassure the person that they are doing the right thing in disclosing the abuse,
- Consider the immediate health and safety of the person and contact the appropriate medical/emergency services, if required;
- Explain what is happening and who is being contacted;
- Report to the appropriate authority without delay (see next section);
- Make a record of what has been said (in the person's own words) and what actions have been taken;
- Date and sign the record.

The person hearing the disclosure should not:

- Stop the person from disclosing;
- Promise to keep secrets;

⁴ Where the person withholds consent to sharing the information the advice of CSPS and/or the HSE should be sought without, at this point, giving any identifying information

- Initiate an investigation;
- Ask leading questions or press for details;
- Make any comment or judgment on the alleged abuser;
- Reassure the person that everything will be alright or that the matter can be resolved quickly;
- Promise continuing support unless sure this can and will be provided;
- Disclose the information, other than in accordance with this policy;
- Leave details of any concern on a voicemail or e-mail;
- Contact the alleged abuser.

Checking things out: Concerns may come to light other than through a disclosure initiated by the vulnerable adult. For example, if a parish volunteer notices an injury to a vulnerable adult it would be appropriate to ask how it happened. However, it is not appropriate to initiate an investigation by asking questions that relate to the detail or circumstances of the alleged abuse, beyond initial enquiry and then listening and expressing concern for the injured adult, and then seeking advice.

4.3 Reporting

All concerns that a vulnerable adult has been abused, is being abused or is at risk of abuse should be reported without delay to the appropriate civil authorities, once the issue of consent has been addressed. Such concerns are reported to the HSE. Information that a person has committed a serious offence against a vulnerable person (as defined in the legislation) must be reported to the Gardaí in addition to the HSE. The relevant offences are specified in the Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act. They include most sexual offences and others such as assault causing harm, abduction, manslaughter and murder. There are other forms of abuse not covered by this piece of legislation that may also be criminal in nature such financial abuse, neglect and psychological abuse (harassment) and these may also need to be notified to the Gardai. This should be discussed with the relevant HSE Safeguarding and Protection Team when the matter is being reported to it and their advice/ direction followed.

The diocesan Designated Liaison Person (DLP) and Deputy DLP are available to offer advice and support and, if appropriate, to report the matter to the civil authorities on behalf of the person concerned about possible abuse of a vulnerable adult.

All concerns that a vulnerable adult has been abused, is being abused or is at risk

of abuse within a church context should be reported to the Designated Liaison Person (DLP) or deputy DLP for the Diocese. This can be done instead of reporting to the civil authorities on the basis that the DLP or the deputy DLP will undertake the reporting to the civil authorities. The person making the report can go directly to the civil authorities if they so choose. However, it will assist the Diocese to take immediate protective measures if the person making the report shares the information with the diocesan DLP or deputy DLP.

If there is an immediate concern for the protection of a vulnerable adult, the Gardaí should be contacted. Such a concern could arise, for example, if a vulnerable adult states that he or she cannot go home for fear of being assaulted.

4.4 Dealing with concerns that arise within a Church context

The following steps are taken in relation to concerns for the protection of vulnerable adults that relate to diocesan personnel in the context of Church activities once the issue of the person's consent has been satisfactorily addressed:

- Concerns that are reported to the diocesan DLP or deputy DLP are initially assessed by them to determine whether they relate to abuse, as described in the HSE adult safeguarding policy, and are then reported to the civil authorities as outlined above;
- All such concerns about vulnerable adults that relate to diocesan personnel are notified to the Archbishop;
- Appropriate interim protective measures are taken, pending the outcome of any investigation and/or assessment by the civil authorities. Such measures are a neutral act to allow an investigation and/or assessment to proceed. They typically involve the person about whom a complaint has been made or a concern expressed (referred to as 'the respondent') having no contact with vulnerable adults;
- Final determination of the person's future role within the Archdiocese is informed by the outcome of any investigation by An Garda Síochána, HSE assessment and internal disciplinary processes;
- Information about a vulnerable adult concerns is only shared with those who need such information in order to keep vulnerable adults safe;
- A record is made of all such vulnerable adult protection concerns. All records are stored and retained in accordance with the appropriate professional and legal requirements in relation to confidentiality and data protection and in accordance with diocesan policy (see Appendix 4);

- Allegations that a cleric has sexually abused a vulnerable adult are dealt with in accordance with procedures outlined in: *Archdiocese of Dublin: Procedure for Dealing with Allegations of Sexual Abuse of Children or Vulnerable Adults against Clerics of the Archdiocese of Dublin*. Allegations against employees or volunteers are dealt with in accordance with diocesan HR policies. In both cases the application of these procedures await the outcome of the investigation and/or assessment carried out by the civil authorities;
- No person found to have abused a vulnerable adult is permitted to minister in or work on behalf of the Archdiocese of Dublin.

Role of the CSPS

The CSPS, under the authority of the Archbishop and working in close cooperation with the HSE and An Garda Síochána, manages cases involving clerics working for the Diocese. The role of CSPS in situations regarding parish workers is to provide advice and assistance and to ensure that the parishes act in compliance with national guidelines. In every case, civil processes take precedence over internal diocesan processes.

Those who work as chaplains in hospitals, prisons and educational institutions should follow the policy and procedures of the agency that employs them, for example, the HSE. The CSPS is available to offer advice and support to such chaplains.

The contact details for those who need to be contacted are given below.

Designated Liaison Person (DLP):

Andrew Fagan, 01 8360314, andrew.fagan@dublindiocese.ie

Deputy DLP:

Deirdre Donnelly, 01 8360314, deirdre.donnelly@dublindiocese.ie

An Garda Síochána:

Contact details for local Garda station available from directory enquiries on 11811/11850, www.garda.ie. In an emergency, call 112 or 999.

HSE:

Contact details of local office available from the HSE National Safeguarding Office on 061 461165 or at: Safeguarding and Protection Teams – HSE.ie

APPENDIX 1: CONTACT DETAILS FOR HSE SAFEGUARDING AND PROTECTION TEAMS

The teams that cover the area of the Archdiocese of Dublin are:

**HSE, Area 9 (North Dublin), St Mary's Hospital, Phoenix Park,
Dublin 20, 01 795 9528, safeguarding.cho9@hse.ie;**

**HSE, Area 8 (Laois/ Offaly), Primary Care Services,
Leighsbrook Lane, Off Railway Street, Navan, Co Meath
C15 Y2CW, 01 691 4632, safeguarding.cho8@hse.ie;**

**HSE, Area 7 (Kildare, West Wicklow, Dublin South City and
Dublin South West), Beech House, 101–102 Naas Business Park,
Naas, Co Kildare, 045 920 410, safeguarding.cho7@hse.ie;**

**HSE, Area 6 (Wicklow, Dún Laoghaire, Dublin South East),
Ballinteer Health Centre, Ballinteer Avenue, Ballinteer,
Dublin 16, 01 216 4511, safeguarding.cho6@hse.ie;**

**HSE, Area 5 (Wexford), HSE Offices, Dublin Road, Lacken,
Kilkenny, 0818 101 101, safeguarding.cho5@hse.ie.**

APPENDIX 2: DEALING WITH COMPLAINTS

General complaints and safeguarding concerns are separate matters. Safeguarding concerns are dealt with in Chapter 4 of this document.

The Archdiocese of Dublin proceeds on the basis that most of those who minister on its behalf are motivated by concern for their neighbour. There are procedures in place to deal with situations where this is not the case. Even when it is, things can and do go wrong and effective means are needed to put them right.

The Archdiocese of Dublin's *Standards and Guidelines for Priestly Life and Ministry* sets out a procedure for dealing with complaints against priests of the Diocese. What follows in this document applies to others who work in parishes.

A simple way of understanding a complaint is as an expression of dissatisfaction. People complain when they are unhappy about something. Dealing with complaints is about trying to put things right, rather than allocating blame for something that has gone wrong. Most people respond positively when their complaints are heard, taken seriously and they are given an undertaking that steps will be taken to ensure that the thing that caused them unhappiness does not recur. A simple apology can go a long way to address a person's complaint and to establish or restore a positive relationship with the complainant.

A person may never use the term 'complaint' when expressing unhappiness about something that has happened. Indeed, many people find it difficult to make or to be seen to make a complaint. There is a responsibility on those who work in parishes to be alert to expressions of unhappiness (which may be non-verbal) and to respond appropriately. Such a response could be as simple as asking the person if everything is okay with them. Ignoring signs of unhappiness is not good safeguarding practice.

Complaints are best addressed as close as possible to the source of the problem. For example, if a parish volunteer inadvertently does something to upset a parishioner an immediate and unqualified apology is the most appropriate response.

Where a matter cannot be resolved in this simple and direct manner, another volunteer or church worker may be able to assist in bringing about resolution through negotiation

and mediation. Such an intervention can be effective where a misunderstanding has arisen between the parties involved.

Sometimes complaints cannot be resolved immediately and it is good practice that within every activity or group there is a person designated to deal with complaints. This person's role is to attempt to resolve the matter through negotiation and mediation between the parties involved. If resolution is not achieved, or if there is no designated person to deal with the matter within the group, responsibility for resolution is likely to fall on the parish priest.

At the point where a complaint is referred to the group's designated person or to the parish priest a note should be made of the incident or situation giving rise to the complaint and the outstanding issues. The parish priest will then have to determine what steps need to be taken to resolve the matter. One option to be considered is to have the complaint investigated by a person from outside the parish. This is likely to be expensive and time consuming and, in assessing such a course of action, the parish priest should consider the following:

- the seriousness of the matter complained of;
- the integrity of the complaint, that is, whether it stands on its merits or relates to an underlying issue such as enmity between individuals or groups;
- the impact of the process of investigation, which can sometimes encourage those in dispute to take up more entrenched positions as they seek to justify their own position or prove an opponent wrong,
- the likely outcome of the investigation and whether it will lead to a resolution of the issues that gave rise to it.

In many instances informal means of resolving complaints are to be preferred. This is not always possible and formal, independent investigations are required. Parish priests who are uncertain how to proceed should seek the advice of the diocesan Moderator, the Office for Clergy and/or the Child Safeguarding & Protection Service.

When complaints relate to the behaviour of Church personnel other procedures may have to be invoked such as the disciplinary procedure or the child or vulnerable adult protection procedure. Where such procedures are invoked they are additional to and not a substitute for attempts to resolve the unhappiness or dissatisfaction of the complainant.

APPENDIX 3: WHISTLEBLOWING POLICY

Whistleblowing is a term used to describe the action of someone who reveals/discloses wrongdoing within an organisation to the public or to those in positions of authority. There is legal protection for whistle-blowers. The Protected Disclosures Act 2014 provides legal safeguards to employees, volunteers, contract and agency workers and people on work experience schemes to report illegal practices or other specified wrongdoings such as abuse. This applies where the disclosure is made in good faith and on reasonable grounds and relates to any conduct or action which raises a significant danger to public health or safety.

The Archdiocese of Dublin is committed to accountability and transparency as described on page 14 of this document. The purpose of this policy is to encourage those who have concerns for the welfare or safety of those involved in church activities in the diocese and its parishes to express their concerns without the fear that they will be victimised or harassed for so doing.

It may be difficult to raise concerns about the practice of colleagues. There can be a reluctance due to:

- fear of getting it wrong and damaging the reputation of a colleague;
- fear of disrupting working relationships;
- fear of not being believed;
- fear that the information will be used inappropriately, precipitating a chain of events that spirals out of control.

These considerations have to be considered in the light of the following:

- the responsibility of everyone working for or on behalf of the Diocese for the protection and welfare of all, especially children and vulnerable adults;
- that raising a concern in a timely manner can prevent a bad situation from spiralling out of control;
- that raising a concern about one situation can reduce the risk of a similar situation arising in another part of the organisation;
- that raising a concern about poor or inappropriate practice will prevent the person raising the concern from becoming implicated in such practice.

The Archdiocese of Dublin is committed to ensuring that any person who raises a concern for the safety or welfare of any person arising from their involvement with their

parish will not be victimised, harassed or in any way disadvantaged provided that the person has reasonable grounds for concern.

Any person who is concerned about poor or inappropriate practice or behaviour in a parish should report it to the person in charge of the activity or to the parish priest. However, the person may decide to take the concern directly to the diocesan DLP or deputy DLP, or to the civil authorities. Whatever decision the person takes, the concern will be taken seriously, investigated and the appropriate action taken.

If the person believes that their concern about an employee or volunteer has not been heard or taken seriously or that they have suffered negative consequences for raising the concern, they should bring the matter to the attention of the Moderator of the Curia, Diocesan Offices, 20–23 Arran Quay, Dublin 7, D07 XK85, phone: 01 8087559.

If the person believes that their concern about a cleric has not been heard or taken seriously they should bring the matter to the attention of the Vicar for Clergy, Archbishop's House, Drumcondra Road Lower, Dublin 9, D09 H4C2, phone: 01 8087519.

The Child Safeguarding & Protection Service is available to provide advice and support to any person who is concerned about the protection and welfare of a vulnerable adult. Deirdre Donnelly (Safeguarding and Support Officer) and Andrew Fagan (Director) are available during office hours on 01 8360314. They can also be contacted by email at deirdre.donnelly@dublindiocese.ie or andrew.fagan@dublindiocese.ie.

APPENDIX 4: INFORMATION SHARING, CONFIDENTIALITY AND DATA PROTECTION

The Archdiocese of Dublin recognises the importance of ensuring every person's right to confidentiality and is committed to keeping confidential all personal information in so far as this is possible and lawful. When a vulnerable adult protection concern arises the information is shared on a "need to know" basis, that is, it is shared with those who need to know it in order to ensure that vulnerable adults are protected from harm. It is shared with the civil authorities, the HSE and An Garda Síochána. If it relates to a cleric or parish worker, it is shared with the relevant Church authority, including the Archbishop. The information is shared in accordance with the requirements of relevant national guidelines, this policy and as required by law. Sharing information about vulnerable adult protection concerns, following the procedure outlined in this policy, with the appropriate authorities is not a breach of confidentiality. Those who work for or on behalf of the Diocese cannot give an undertaking to any person not to disclose information about vulnerable adult protection concerns on the grounds of confidentiality.

The *Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012* creates an offence of failing to disclose to An Garda Síochána, without reasonable excuse, information relating to certain specified serious offences against a child or a vulnerable person (as defined in the legislation), where it is known or believed that the information will be of material assistance in securing the apprehension, prosecution or conviction of another person known or believed by the first person to have committed an offence. The specified offences include most sexual offences and others such as assault causing harm, abduction, manslaughter and murder.

Data protection legislation ensures that an individual's rights to privacy and dignity are respected, particularly regarding the use and sharing of personal data (information), whether the personal data is held electronically or in manual form. Article 6(1)(c) & (d) and Article 9(2)(c) & (f) of the GDPR 2018 allows the sharing of this personal and sensitive data.

The records of the CSPA that contain personal information about respondents,

complainants and others are stored in secure, locked fireproof cabinets and can only be accessed by members of CSPS staff.

Computer records are password protected and encrypted and the use of Multi Factor Authentication is required when accessing them remotely. Those staff members accessing computer records are required to log on to diocesan computers using their own personalised password. They are also required to complete cyber security training.

Personal computers and servers used by CSPS staff have multiple levels of protection including:

- Firewalls
- Endpoint protection software
- Cyber security protection
- Automated patching of Operating System and application software
- Email filtering to block malicious emails
- Laptop disk encryption
- Restrictions on software installations and configuration changes.

Records relating to vulnerable adult protection concerns are retained for 100 years. Other records are deleted from computer records once they are no longer required for the purpose for which they were created and paper records are shredded.

Those on whom the CSPS holds personal data are entitled to it subject to limited exceptions. Applications to obtain such personal data should be made to the Director of the CSPS in writing. Applicants may be asked to provide proof of identity. There is no charge for this.

The data protection policy is set out in detail in the Data Privacy Notice, 2025, at <https://csps.dublindiocese.ie/wp-content/uploads/sites/3/2025/01/Data-Privacy-Notice-2025-1.pdf>

Archdiocese of Dublin



**Child Safeguarding
& Protection Service**

20–23 Arran Quay, Dublin 7, D07 XK85

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