

# 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

March 2023



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# **CHAIRMAN'S FOREWORD**

The launch of this report marks an important milestone for St John Ambulance Ireland (SJAI). The Report's publication represents a critical line in the sand for the organisation. It is not a time to put past failings behind us and move on. Instead, it heralds a period of reflection and learning as we continue our journey to ensure everyone entrusted to our care is safe.

In March 2021, on foot of historic allegations relating to a former volunteer, the Board of SJAI commissioned an independent review to undertake a thorough assessment of the handling of past complaints of abuse at the organisation. The review, which was conducted by Dr Geoffrey Shannon SC, an internationally recognised expert in family law and the law relating to vulnerable adults, also evaluated the current safeguarding practices within SJAI.

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, I hope that you will be assured that we are leaving no stone unturned as we implement every recommendation that has been made to us.

Furthermore, I 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 Board of SJAI, I wish to unreservedly apologise 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.

Finally, I would like to express our gratitude to Dr Shannon and his team for their professionalism, dedication and hard work in conducting the Independent Review.

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

### **David Strahan**

Chairman St John Ambulance Ireland



# **OVERVIEW**

This document outlines how SJAI intends to respond to the findings of the independent review carried out by Dr Geoffrey Shannon.

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.

Dr Shannon 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 this regard, while the review process has been ongoing, SJAI has sought to improve its governance policies.

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.

The current Board of SJAI has been fully committed to seeing the independent review process to its conclusion, which has been somewhat delayed by the Covid-19 pandemic. The Board has accepted all the recommendations made to SJAI, and has overseen the preparation of a comprehensive implementation plan contained in this response document.

A refreshed Board will be constituted later in 2023 which will continue to ensure SJAI has safeguarding at the heart of its agenda.

Dr Shannon presented his report to the Board of SJAI on 28<sup>th</sup> November 2022, and the Board has since undertaken the necessary due diligence process, before publishing the report in full.



# **RECOMMENDATIONS AND RESPONSE**

Dr Shannon makes a series of recommendations as part of his Independent Review of the Handling of Past Complaints of Abuse in St John Ambulance Ireland (SJAI).

SJAI accepts every recommendation in the report in full and is committed to implementing them all in the earliest possible timeframe.

This response document sets out each of the recommendations made by Dr Shannon and outlines the actions that St John Ambulance Ireland has taken, and will take, 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.



# **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.



RECOMMENDATION	WE HAVE	WE WILL
	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	
1 <b>A</b>	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	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
	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	
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
1 <b>C</b>	SJAI fully acknowledges and deeply regrets that victim-survivors 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



# **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.

RECOMMENDATION	WE HAVE	WE WILL
<b>2A</b>	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 victimsurvivors through recognised providers One in Four and My Mind  The initial arrangement was for one consultation followed by six counselling sessions but 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



# **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.



RECOMMENDATION	WE HAVE	WE WILL
3 <b>A</b>	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
3B	SJAI has in recent years taken on a small number of professional, full-time staff at national headquarters  This group supports the day-to-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
<b>3C</b>	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 co-operative regions and not in siloes	We will develop robust internal accountability frameworks which are transparent and apply equally to all ranks of our organisation



As part of the modernisation agenda, SJAI will continue the move from a Rankled structure to one where appointments or assignments are made to key leadership roles with terms of office and SJAI is fully committed to strict time limits obtaining – e.g. three-or transparency and openness in its five-year terms. This will align with the operations provisions for the Commissioner to hold 3D office for five-year terms at a time, There are existing term limits in renewable if the Board deems place for board members appropriate Certain positions within the organisation will be advertised externally, and also open to individuals who are not prehospital, uniformed members



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 three-to-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 guardians. We have acquired a new enterprise management system to make this easier for parents and guardians

3E



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
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# **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.



RECOMMENDATION	WE HAVE	WE WILL
<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  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
4В	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



4C		We will ensure our change programme encourages an open, questioning, culture
4D	We have now removed Rule 122 from our Rules & Regulations	
<b>4E</b>	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 has invested in a new Enterprise Management System that moves the organisation from an adhoc system of databases to a central, dynamic, single database that professionalises individual member and supervisor real-time information  SJAI has informal occasional, access to professional expertise outside SJAI, when advice is required, as well as the opportunity to take advice from those professionals who volunteer in SJAI and provide their personal expertise to policy making (medical, nursing, teaching etc.)	SJAI will recruit a professional safeguarding officer to work in HQ SJAI will expand its safeguarding committee to include external members SJAI will introduce a system of checks and audits of our safeguarding implementation on a structured basis SJAI will have a cadet Enterprise Management System operational by the end of 2023



# **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.



RECOMMENDATION	WE HAVE	WE WILL
5A	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
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
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
5D		Enhanced ongoing communications processes for 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, non-safeguarding, issues  All members will regularly be reminded as to where they should go with a child safeguarding complaint
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



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 and agesensitive, 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
5H	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



# **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.



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RECOMMENDATION	WE HAVE	WE WILL
6 <b>A</b>	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
6B	We have voluntary access to external expertise on a reactive basis	Recruitment for the national safeguarding officer role will focus exclusively on experience with child welfare, ideally in a large organisation
<b>6</b> C	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
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  Such local information is made available to cadets' parents and guardians or officers	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  We will ensure that cadets' parents and guardians are reminded of the local safeguarding points of contact, including through prominent 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



6E

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 pre-hospital cover and regular spot checks will ensure full compliance

We will ensure all safeguarding officers are regularly reminded of the relevant statutory contact information



# **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.



RECOMMENDATION	WE HAVE	WE WILL
	We are investing, and will continue to invest in the required resources to ensure membership lists and management systems are up to standard	
<b>7A</b>	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
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
<b>7C</b>	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



## **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 preeminent. 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.



RECOMMENDATION	WE HAVE	WE WILL
8 <b>A</b>	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 HQ 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
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 only at the cadet level, but for the organisation as a whole  We are committed to ensuring that a robust safeguarding regime is in place, and continuously reviewed, in order to maintain best practice  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



8C	SJAI's structures endeavour to allow each cadet develop to their potential by assigning each cadet with roles and training appropriate to their skills	We will review structures within our cadet divisions to ensure individual development is pre-eminent and that it respects the individuality of each cadet  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
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



# **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 e-learning 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.

RECOMMENDATION	WE HAVE	WE WILL
9 <b>A</b>		The internet safety education session will be carried out in all divisions, every two years, starting in 2023
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
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



# **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.



RECOMMENDATION	WE HAVE	WE WILL
RECOMMENDATION	WE HAVE	WE WILL
10 <b>A</b>	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
10B	Applications for membership of SJAI are not considered complete until the conclusion of Garda vetting, Tusla online safeguarding training and SJAI safeguarding training	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
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



# **RECOMMENDATION 11:**

### MAINTAINING BEST PRACTICE ON A CONTINUING BASIS

- 11 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.
- **11A** 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.
- 11B 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.
- 11C 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.
- 11D 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.
- 11E 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.



RECOMMENDATION	WE HAVE	WE WILL
11 <b>A</b>	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
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 wellbeing of our cadet membership at the top of our priorities and to resource our child safeguarding work accordingly
11 <b>C</b>	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
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



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
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 HQ staffing complement



# **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) is a landmark moment for the organisation. While the report's findings are critical to uncovering the truth with regard to the handling of past complaints of abuse at the organisation, equally as important is our determination to implementing the recommendations that have been made.

Having read our response document, including the commitments and progress we have made as an organisation outlined on prior pages, I hope that you are assured that we are doing everything possible to ensure everyone entrusted to our care is safe.

As Commissioner, I can 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. For years, in line with our Children First obligations, we have sought to adhere to best practice safeguarding guidelines and principles. The Independent Review process conducted by Dr Shannon 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.

However, we can never become complacent. As an organisation, we are 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.

Finally, I would like to associate myself in the strongest possible terms with the remarks made by SJAI's Chairman David Strahan, on behalf of the whole Board, in the foreword to this important document. I would also like to acknowledge the victims who have spoken out about their abuse either publicly or through the Independent Review process. They are 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 sincerely for helping to uncover these issues and apologise sincerely for the hurt they have endured.

### **John Hughes**

Commissioner
St John Ambulance Ireland