



**CLIFFS OF  
MOHER**

# CLIFFS OF MOHER EXPERIENCE

## Child Safeguarding Statement

MARCH 2022

## INTRODUCTION

The Cliffs of Moher Centre Designated Activity Company (COMC- DAC) is a Company registered in 2005 with the Companies Registration Office (CRO). It is a wholly owned subsidiary of Clare County Council (CCC) established to operate the Cliffs of Moher experience on behalf of Clare County Council, including all elements of staff recruitment, training, and staff management of those who work at the Cliffs of Moher.

The Cliffs of Moher Centre Designated Activity Company (COMC- DAC) is a company established to operate the Cliffs of Moher Experience on behalf of Clare County Council through the Directorate of Rural Development and West Clare Municipal District.

For the purpose and ease of the **Child Safeguarding Statement** all reference to the Cliffs of Moher Centre Designated Activity Company (COMC- DAC) and or the Cliffs of Moher (COM) where applicable will be refer to the Cliffs of Moher Experience (COME).

This Child Safeguarding Statement is in compliance with the requirements of the Children First Act 2015 and of Children First National Guidelines for the Protection and Welfare of Children 2017. The statement sets out the services being provided by the Cliffs of Moher Experience (COME) and the principles and procedures that are in place to ensure, as far as practicable, that a child/young person availing of, or in contact with, Cliffs of Moher Experience (COME) services is safe from abuse or harm. This statement includes an assessment of risk of "harm" to a child/young person while availing of or in contact with Cliffs of Moher and procedures to manage such risks are specified.

This document has been developed with reference to the following:

### **Children First Act 2015**

*"Children First National Guidelines for the Protection and Welfare of Children". DYCA 2017*

*"Guidance on Developing a Child Safeguarding Statement" (tusla.ie)*

*"What is a risk assessment?" (tusla.ie)*

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## **2. The legal requirement for the Cliffs of Moher Experience (COME) is to complete a Child Safeguarding Statement, as a relevant service, is as follows:**

Under Section 10 of the Children First Act 2015 **a provider of a relevant service** "shall ensure, as far as practicable, that each child availing of the service from the provider is safe from harm while availing of that service."

Provider means in relation to a relevant service, a person

- (a) who provides a relevant service, and
- (b) Who, in respect of the provision of such relevant service-
  - 1) Employs (whether under contract of employment or otherwise) one or more than one other person to undertake any work or activity that constitutes a relevant service,
  - 2) Enters into a contract for services with one or more than one person for the provision by the person of a relevant service, or
  - 3) Permits one or more than one person (whether or not for commercial or other consideration and whether or not as part of a course of education or training, including an internship scheme) to undertake any work or activity, on behalf of the person, that constitutes a relevant service."

(Reference Schedule 1 Children First Act 2015 for a full definition of relevant services)

Providers of such relevant services, such as the Cliffs of Moher Experience (COME), are required under Section 11 (2) of the Act to:

- a) Undertake an assessment of any risk including the potential for harm to a child while availing of the service
- b) Prepare in accordance with subsection (3) a child safeguarding statement, and
- c) Appoint a relevant person as the first point of contact in relation to the Child Safeguarding Statement

Section 11(3) of the act states that such a “child safeguarding statement **shall** include a written assessment of the risk and, in that regard, specify the procedures that are in place:

- a) To manage any risks identified
- b) In respect of any member of staff who is the subject of any investigation (howsoever described) in respect of any act, omission or circumstance in respect of a child availing of the relevant service.
- c) For the selection or recruitment of any person as a member of staff of the provider with regard to that person’s suitability to work with children
- d) For the provision of information and, where necessary, instruction and training, to members of staff of the provider in relation to the identification of the occurrence of harm
- e) For reporting to the Agency (TUSLA, Child and Family Agency) by the provider or a member of staff of the provider (whether a mandated person or otherwise) in accordance with this act or the guidelines issued by the Minister under Section 6 (Children First National Guidelines, 2017)
- f) For maintaining a list of persons (if any) of the relevant service who are mandated persons, and
- g) For appointing a relevant person for the purposes of this part of the Act.

**The relevant person for the Cliffs of Moher Experience (COME) is Geraldine Enright the Director of the Company**

**NB.** Children First national guidance states that providers of relevant services should appoint a named person to lead the implementation of guiding principles and child safeguarding procedures. This person is also responsible for ensuring that the policies and procedures are aligned with best practice as set out in Children First national guidance 2017.

**The named person for the Cliffs of Moher Experience is Geraldine Enright, the Director of the Company**

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### **3. The Organisation**

Cliffs of Moher Experience’s services cover the following

- 🕒 Admission entry to site and initial point of contact in the main car park and coach park.
- 🕒 Car park support and interaction with visitors to guide them to the visitor’s centre
- 🕒 Transport with a dedicated buggy for visitors with reduced mobility
- 🕒 Guided tours of the 14-acre site, which includes O’Brien’s Tower and the Exhibition Area in the Visitors Centre including the imax film area
- 🕒 Visitor Management and crowd control throughout the site, the concourse, visitors centre, coach park area
- 🕒 Cliffs Edge Patrol
- 🕒 Litter and leave no trace management of the SPA site
- 🕒 First Aid Services with the Cliffs of Moher Experience Site
- 🕒 Pre booking of all trade and tours through a self-login and through a dedicated booking department
- 🕒 Educational visits to primary and secondary schools through our outreach programme
- 🕒 Providing transition year and third level college work experience opportunities

#### 4. Nature of Service

Cliffs of Moher Experience directly provides employment to 65 staff, and this rises to 90 during the summer season. The nature of the services is to provide a World Class Visitor Experience while adhering to best practice in the conservation of the Cliffs of Moher, the environs and heritage. The Cliffs of Moher Experience mission and values, sets out clearly our best practices, to ensure the highest possible standards in safety, health, and wellbeing and that all visitors, staff, and students who work and visit us are treated with respect and integrity.

The level of contact with children for some of the staff and volunteers may be daily while for other staff it may be occasional.

#### Note

- Cliffs of Moher Experience has completed this child safeguarding statement in respect of all Cliffs of Moher Experience services, both onsite and offsite.
- It will be the responsibility of the providers of relevant services who are working either jointly with the Cliffs of Moher or using the facilities, to have in place their own Children First compliant policy and procedures. This should include a completed risk assessment, a child safeguarding statement and confirmation that a relevant person is appointed. The Cliffs of Moher Experience (COME) in conjunction with Clare County Council (CCC) will review such documentation annually.

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#### 5. Principles to Safeguard Children and keep them safe from harm

The Cliffs of Moher Experience is committed to a child centred approach in the provision of services and the use of its facilities. COME staff/volunteers are committed to the following principles in safeguarding children and maintaining child centred services:

That the safety and welfare of children is everyone's responsibility

- That the promotion of the welfare, health and safety of children is paramount
- That all children have an equal right to attend the Cliffs of Moher Experience and use the facilities, to be respected as individuals and encouraged to reach their potential, regardless of background
- That children/young people raising welfare or abuse concerns will be treated equally and listened to by staff members and/or volunteers
- That any identified welfare or protection concern of a child that becomes known to COME staff members will be managed appropriately by the body and in compliance with best practice as set out in Children First 2017 and within Cliffs of Moher Experience Policy and Procedures for the Protection and Safeguarding of Children 2021
- That safe procedures are in place and implemented, to respond to an allegation of abuse of a child/young person against staff /volunteer
- That procedures are in place to respond to an allegation of abuse of a child by another child/young person
- That a specific safeguarding children training plan is in place to ensure that all staff /volunteers are aware of their role in keeping children safe and to raise organisational awareness of this issue
- That safe management procedures are in place for all staff members and volunteers, covering recruitment, and a person's suitability to work with children and or vulnerable persons.
- That designated liaison persons and mandated persons, if applicable, in respect of safeguarding children are identified, trained, and are known to all staff members and volunteers.
- That COME has developed and is maintaining clear and secure record keeping procedures in respect of child welfare and protection concerns. Such records will be retained by the Designated Liaison Person.
- That a code of behaviour is in place for staff/volunteers which sets out their responsibilities in interacting with children and young people
- That a code of behaviour is in place which outlines the responsibilities of children and young people in their interactions with each other and adults whilst attending the facility or engaging with its services
- That COME recognises the importance of multi-agency working in keeping children safe and on that basis working relationships have been developed with the relevant statutory agencies e.g. An Garda Síochana and Tusla

**6. Risk Assessment**

The Cliffs of Moher Experience is not involved in the direct provision of childcare services therefore parents/guardians (which includes teachers) are chiefly responsible as primary carers for ensuring that children come to no harm when visiting the location. However, as per the requirements of complying with the Children First Act 2015 COME has completed a risk assessment with a view to having a safeguarding plan in place which minimises the risk to any children on site.

The completed risk assessment frameworks are set out below.

**Note**

**Section 11(1) (a) of the Children First Act 2015 defines risk as ‘any potential for harm to a child while availing of the service’**

**Section 2 of the Act defines harms as ‘harm means in relation to a child:**

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

**Risk Assessment Framework Part 1**

Completed February 2020 by Cliffs of Moher Centre Experience (COME)

<b>General Questions</b>	<b>Yes</b>	<b>No</b>	<b>Not Known</b>
Do you provide a service in multiple locations?	X Including outreach to schools		
Do your staff have contact with children and families in the service you provide?	X		
Do you fund other groups/organisations to provide services to children?  If yes, are they Children First compliant in terms of policy and procedures?		X	N/A
Do service level agreements and grant agreements include Children First compliance as part of the funding conditions?		X	
Are quality assurance measures in place to measure and evidence this compliance?		X	

## **Risk Assessment Framework 2**

The table below sets out the identified risks to the safety of children and young people, involved with or in contact with Cliffs of Moher Experience services and the steps taken to manage and minimise the risk of harm.

Responsibility is placed on the Cliffs of Moher Experience (COME) and external providers of relevant services and specifically Clare County Council (CCC) as the legal holder of the site in accessing the Cliffs of Moher Experience who are providing a service to children, to manage the risk issues relevant to them and to take steps to minimise the risk of harm.

\*Rank: L = Low, M =Medium, H = High (at point of completion of this framework)

<b>Potential risk/harm to children identified</b>	<b>Current controls - procedure in place to manage risk identified</b>
1) A named person is <b>not</b> appointed to ensure implementation of the Act (Children First Act 2015)	A named person has been identified. The details of this person are known to all Cliffs of Moher Experience (COME) employees, volunteers, contractors and funded groups and agencies.
2) A declaration of guiding principles in safeguarding is <b>not</b> in place	The guiding principles for safeguarding children are contained within the Cliffs of Moher Experience (COME) Child Safeguarding Statement and within the Cliffs of Moher Safeguarding Children Procedures. The statement also includes a child safeguarding risk assessment.
3) Key child safeguarding personnel are <b>not</b> in place, including designated liaison person (DLP) and mandated persons( where applicable )	Designated liaison person and Deputy liaison person are in place.
4) Contact details for DLPs are <b>not</b> known	Contact details for DLPs are within the safeguarding children procedures document and online on the website under Safeguarding Children and in safeguarding notices on site.
5) DLP roles are <b>not</b> clearly understood by all staff	All staff and relevant others have received briefing information in respect of the role and function of DLPs and their role in safeguarding children.
6) Mandated persons roles are <b>not</b> clearly understood by all staff	All staff and relevant others have received briefing information in respect of the role and function of mandated persons. This is not applicable currently at the COME
7) A procedure for maintaining a list of mandated persons is <b>not</b> in place	A procedure for maintaining a list of mandated persons is in place and is held by the named person responsible for leading the implementation of the Act. This is not applicable currently at the COME
8) Children First compliant procedures are <b>not</b> in place for <b>reporting</b> children first or welfare concerns – allegations, suspicions, concerns, or knowledge in respect of child abuse are not reported appropriately	A safeguarding children policy and procedures document is in place which is Children First compliant.
9) All staff are <b>not</b> aware of the need to inform TUSLA if reasonable grounds for concern are deemed to exist in respect of an allegation of abuse of a child	All staff have access to the safeguarding children policy and procedures document. In addition, they have completed the E learning Children First module on the TUSLA.ie website by quarter 4 2022 and quarter 1 2023.

10) Children First compliant procedures are <b>not</b> in place for information sharing and recording all child protection or welfare concerns, including those which initially do not meet reasonable grounds for concern	Children First compliant procedures are in place for information sharing and recording all child protection or welfare concerns in respect of children and young people. This process is managed by the DLP.
11) A policy is <b>not</b> in place for responding to information requests on behalf of children / young people referenced in protection and welfare reports	A policy is in place for responding to information requests on behalf of children / young people referenced in protection and welfare reports.
12) A clear policy on confidentiality is <b>not</b> in place	A policy in respect of confidentiality is in place.
13) Guidance on responding to children who disclose abuse is <b>not</b> included in guiding principles and child safeguarding procedures	Guidance is in place in the policy and procedures for the protection and safeguarding of children on responding to children who disclose abuse.
14) Clear procedures are <b>not</b> in place for responding to adult disclosures of childhood abuse where it is identified there may be a current risk to a child	Procedures are in place in relevant policy and procedures document for responding to adult disclosures of childhood abuse where it is identified there may be a current risk to a child.
15) Clear procedures are <b>not</b> in place for responding to allegations of child abuse against staff and volunteers	These procedures are in place and referenced within the relevant policy and procedures document.
16) There is <b>not</b> a written procedure for responding to allegations made against a child or young person received by staff/volunteers	As above
17) A Speaking Up (Protective Disclosures) policy is in place for staff/volunteers to report concerns externally if they are inhibited, for any reasons, in reporting a concern internally and is available on the Employee Communication Platform	As above
18) A Children First compliant recruitment and selection procedure is <b>not</b> in place with regard to a person's suitability to work with children /young people	Safe recruitment procedures are in place.
19) The organisation does <b>not</b> have a training strategy for child safeguarding training based on a training needs analysis	A training strategy for the Protection and Safeguarding of Children is in place.
20) Child safeguarding training provided is <b>not</b> consistent with Children First national guidance 2017 and the Children First Act 2015	The Child Safeguarding training made available to staff and volunteers is consistent with Children First national guidance 2017 and the Children First Act 2015.
21) All staff/volunteers have <b>not</b> received child safeguarding training relevant to their role in the organisation	By the end of Quarter Two 2022 all staff and volunteers will have received child safeguarding training relevant to their role in the organisation. This process will be tracked by the named person and the HR service.
22) A record of attendees of child safeguarding training is <b>not</b> held by the organisation	A record of attendees of child safeguarding training is held jointly by the named person and the HR service.

23) There are <b>not</b> policies and procedures in place to support the safe management of activities in involving children	The <b>Policy and Procedures for the Protection and Safeguarding of Children 2021</b> references procedures to support the safe management of activities involving children. Health and Safety risk assessments are also completed for some activities.
24) An accident/incident procedure is <b>not</b> in place for children/ young people	Reference Policy and Procedures for the Protection and Safeguarding of Children 2021
25) There is <b>not</b> a code of behaviour in place for staff and volunteers which specifies acceptable and unacceptable practice with regard to interacting/working with children/ young people	As above in 24
26) There is <b>not</b> a code of behaviour in place for children/ young people, in contact with Cliffs of Moher Experience services, which states the roles and responsibilities in place to encourage positive behaviour	As above in 24
27) The responsibility for all staff/volunteers / to report concerns that they may have about a colleague's practice with children /young people is <b>not</b> clearly stated in policy	Reference Policy and Procedures for the Protection and Safeguarding of Children 2021
28) A disciplinary procedure is in place	Disciplinary and Grievance procedure in place.
29) A lone workers policy is <b>not</b> in place	Reference Policy and Procedures for the Protection and Safeguarding of Children. HR reference.
30) A procedure to provide a copy of the child safeguarding policy declaration to parents/guardians upon request is <b>not</b> in place	This procedure is in place.
31) Children and young people have <b>not</b> been made aware of their right to be protected, consulted, and treated with respect	Children and young people have been made aware of their right to be protected, consulted, and treated with respect.
32) An anti-bullying policy in respect of children and young people has <b>not</b> been developed	An anti-bullying policy in respect of children and young people has been developed and is referenced within the safeguarding children procedures document.
33) A communications policy in respect of child safeguarding has <b>not</b> been developed	A communications policy in respect of child safeguarding is in place.
34) A policy for working in partnership with parents/guardians has not been developed	A policy for working in partnership with parents/guardians has been developed.
35) A complaints policy is <b>not</b> in place	A complaints policy is in place.
36) A child safeguarding plan is <b>not</b> in place to ensure implementation, monitoring and review of the guiding principles and child safeguarding procedures	A 3 year Child Safeguarding plan is being developed and led by the named person.
37) For the selection and recruitment of any staff of the COME a Garda clearance is <b>not</b> in place for all new employees 2021	Garda Clearance to be sought from the National Garda Vetting Bureau in 2021 for all new employees of COME

### Note

All Cliffs of Moher Experience (COME) staff, volunteers and work experience students must be familiar with and adhere to the contents of this Child Safeguarding Statement.

### Note

A child/young person is anyone under 18 years of age, excluding a person who is or has been married (from 1.1.19, under the Domestic Violence Act 2018, a person under the age of 18 can no longer apply to the Circuit Courts for permission to marry. However, a person may get married if permission was granted before 1.1.19 or an application was made before 1.1.19 and permission was granted afterwards).

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## 7. Procedures

This Child Safeguarding Statement has been developed in compliance with the Children First Act 2015, Children First: National Guidance for the Protection and Welfare of Children (2017) and TUSLA's Child Safeguarding: A Guide for Policy, Procedure and Practice.

The following procedures support the Cliffs of Moher Experience (COME) intention to safeguard children and young people while they are availing of our services:

- Cliffs of Moher Experience (COME) child safeguarding statement (March 2022)
- Cliffs of Moher Experience (COME) child safeguarding risk assessment and plan (May 2022)
- Cliffs of Moher Experience (COME) policies and procedures for the protection and safeguarding of children (March 2022) (Policy Ref. COM-HR-2020-0038)
- Cliffs of Moher Experience (COME) anti-bullying guidance (Policy Ref. COM-HR-2020-0031)
- Cliffs of Moher Experience (COME) online safety for children guidance
- Cliffs of Moher Experience (COME) / Clare County Council CCTV policy
- Cliffs of Moher Experience (COME) safe recruitment procedures.
- Cliffs of Moher Experience (COME) code of behaviour for staff, volunteers with regard to their interactions with children and young people
- Cliffs of Moher Experience (COME) code of behaviour for children and young people for when they are availing of Cliffs of Moher Experience (COME) services and facilities
- Cliffs of Moher protected disclosures of information policy, (Policy Ref. COM-HR-2018-0012) "Speaking Up" 2018
- Cliffs of Moher Experience (COME) (Policy Ref. COM-HR-2020-0031) disciplinary process 2021
- Cliffs of Moher Experience (COME) safeguarding children training strategy and action plan 2022
- Cliffs of Moher Experience (COME) safeguarding children communication plan 2022
- Cliffs of Moher Experience (COME) Lone worker policy (Policy Ref. COM-HR-2021-0046)
- Cliffs of Moher Experience (COME) confidentiality guidance

All procedures and policies listed above are available on request or are available on the Cliffs of Moher Experience website, [www.cliffsofmoher.ie](http://www.cliffsofmoher.ie)

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## 8. Implementation

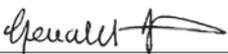
This Child Safeguarding Statement has now been provided to.

- 🕒 All staff /volunteers, relevant groups and agencies linked with the Cliffs of Moher Experience (COME)
- 🕒 On request it will be provided to a parent/guardian (primary carer) of a child availing of the relevant services or activities
- 🕒 Or to TUSLA, child and family agency.

This statement is also available online on the Cliffs of Moher Experience website: [www.cliffsofmoher.ie](http://www.cliffsofmoher.ie)

The Cliffs of Moher Experience is committed to the implementation of this child safeguarding statement and of the policy and procedures that will support our intention to keep children and young people safe from abuse or harm while availing of or in contact with our facilities and activities.

This child safeguarding statement will be reviewed no later than 2 years from the date of issue of this document or as soon as practicable if there has been a material change in any matter to which this statement refers.

Signed  Date 31/03/2022

**Geraldine Enright | Director of the Cliffs of Moher Experience**



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