

Safeguarding Policy

2026 edition



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An Boinn Gníothaí Eachtracha agus Trádála
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Document control

<i>Document</i>	<i>Comhaltas in Britain Safeguarding Policy</i>
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<i>Applies to</i>	All Comhaltas in Britain Branches, Regions, Provincial activity, staff, volunteers, tutors, contractors and activity leaders
<i>Policy owner</i>	Provincial Council / Provincial Safeguarding Team
<i>Review</i>	At least annually, and sooner following significant legal, regulatory, organisational or practice change

How to use this policy

This policy sets the safeguarding expectations that apply across Comhaltas in Britain. It is supported by practical guidance, templates, quick guides, training and the Safeguarding Health Check. The policy explains what must happen; supporting resources explain how to put it into practice.

Policy + Health Check + Resources

The Safeguarding Policy is the governing framework. The Safeguarding Health Check is a practical, supportive review of how arrangements are working in each Branch and Region. Supporting resources provide usable guidance for day-to-day situations. The Health Check is not a substitute for reporting an actual safeguarding concern.

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1. Our safeguarding commitment

Comhaltas in Britain brings people of all ages together to learn, share, experience and celebrate the music and culture of Ireland. Safeguarding is part of how we make that community welcoming, respectful and safe.

We are committed to creating environments in which children, young people and adults can participate without fear of abuse, neglect, exploitation, bullying, harassment or other harm. We will take concerns seriously, respond promptly and work with statutory agencies where this is required.

Safeguarding is everyone's responsibility. We do not expect every volunteer, tutor or committee member to be a safeguarding expert. We do expect everyone involved in Comhaltas in Britain to understand the basic expectations of their role, know how to raise a concern, and ask for help when they are unsure.

Our principles

- People are treated with dignity, respect and fairness.
- The welfare and safety of children and adults at risk of harm come before organisational reputation or convenience.
- Children and young people should be listened to and their views taken seriously in ways appropriate to their age and understanding.
- Adults should be involved in decisions about their own safety wherever possible, with attention to their wishes, rights, capacity and circumstances.
- Concerns are acted on; they are not investigated by untrained Comhaltas volunteers or staff.
- Information is shared on a proportionate, need-to-know basis when this is necessary to protect someone or meet a legal duty.
- Safeguarding arrangements should be practical and proportionate to the activity and risk.
- Branches and Regions should be supported to improve, not ranked against one another.
- We learn from concerns, incidents, feedback, Health Check findings and changes in law and practice.

2. Scope and key terms

This policy applies to all activity organised, delivered or substantially controlled by Comhaltas in Britain, including Provincial, Regional and Branch activity. It applies whether an activity is regular or occasional, in person or online, and whether it takes place in a Comhaltas venue, a hired venue, a home, an education setting, during travel, at a competition or event, or outside Britain.

It applies to paid and unpaid roles, including staff, volunteers, tutors, teachers, committee members, DLPs, event workers, trip leaders, drivers, contractors and visiting leaders where they are acting on behalf of Comhaltas in Britain.

Key terms

Term	Meaning
<i>Child / young person</i>	For this policy, a child or young person means a person under 18. Where a specific law uses a different age threshold, the relevant statutory definition applies.
<i>Adult who may need additional safeguarding support</i>	A plain-language term used in this policy for adults whose circumstances, care or support needs, disability, illness, age, dependence, risk or other factors may make safeguarding support relevant. It does not mean that vulnerability is an inherent or permanent characteristic.
<i>Adult at risk / protected adult</i>	Statutory terms used where the relevant law requires them. Definitions differ between Scotland, England and Wales and must not be treated as interchangeable.
<u><i>DLP</i></u>	Designated Liaison Person: a Branch, Regional or Provincial safeguarding lead within Comhaltas in Britain.
<i>Provincial Safeguarding Team</i>	The collective term for the Provincial Safeguarding Officer and other Provincial safeguarding personnel designated by Comhaltas in Britain.
<i>Safeguarding concern</i>	Any information, observation, disclosure, allegation, behaviour or pattern that suggests a child or adult may be experiencing, or be at risk of, abuse, neglect, exploitation or other harm.
<i>Person in a position of trust</i>	A person whose role, authority, responsibility or influence creates a position of power or trust in relation to a child or adult at risk.

3. Legal and practice Framework

Comhaltas in Britain operates across more than one legal jurisdiction. The safeguarding law and statutory guidance that applies depends on where an activity takes place, the nature of the concern and the role being carried out. This policy therefore sets a consistent Comhaltas framework while recognising important differences between Scotland, England and Wales.

Scotland

Relevant frameworks include the National Guidance for Child Protection in Scotland 2021 (updated 2023), the Adult Support and Protection (Scotland) Act 2007 and associated Code of Practice, the Protection of Vulnerable Groups (Scotland) Act 2007 as amended, and the Disclosure (Scotland) Act 2020.

Since 1 April 2025, Scotland uses the statutory concept of a regulated role rather than regulated work. PVG scheme membership is a legal requirement for people carrying out regulated roles with children, protected adults, or both. From 1 April 2026 the PVG scheme operates on a five-year membership model, with phased transition arrangements for existing members.

England

Relevant frameworks include the Children Acts 1989 and 2004, Working Together to Safeguard Children, the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012, the Care Act 2014 and associated statutory guidance.

From 1 September 2026, the supervision exemption was removed from the statutory definition of regulated activity with children. This means some volunteers who were previously outside regulated activity because they were sufficiently supervised may now be carrying out regulated activity if the other statutory conditions are met. DBS eligibility and barred-list checking must therefore be reviewed by reference to the actual role.

Wales

Relevant frameworks include the Social Services and Well-being (Wales) Act 2014, Working Together to Safeguard People, the Wales Safeguarding Procedures, and the DBS regulated-activity framework that applies in England and Wales. The Wales Safeguarding Procedures include specific arrangements for concerns and allegations about practitioners and people in positions of trust.

Do not ask Branches to interpret the law

Branches and Regions should provide accurate information about what people actually do. Where PVG/DBS eligibility, statutory referral thresholds or jurisdiction are uncertain, the Provincial Safeguarding Team should help determine the correct route.

4. Safeguarding roles and responsibilities

Provincial Council and Board

- Set and approve the organisation-wide safeguarding framework.
- Ensure suitable governance, resources, insurance and oversight arrangements are in place.
- Receive proportionate safeguarding assurance information without routinely receiving confidential case detail.
- Ensure statutory referral duties and organisational learning are addressed.

Provincial Safeguarding Team

- Provide advice, support and escalation for Branches, Regions, DLPs, staff and volunteers.
- Support decisions about statutory referrals, allegations management and cross-border safeguarding.
- Maintain current operational guidance on PVG/DBS eligibility, processes and referral duties.
- Coordinate safeguarding training, resources and the Safeguarding Health Check.
- Maintain appropriate central safeguarding records and identify organisation-wide learning.
- Provide an alternative reporting route where a concern relates to a local DLP or where reporting locally would be inappropriate.

Branches and Regions

Each Branch and Region must appoint at least two DLPs. DLPs may hold other committee roles. Where possible, appointments should consider accessibility and a mix of perspectives, including gender, without replacing an otherwise suitable DLP simply to achieve balance.

- Make DLP contact information visible and easy to find.
- Ensure activities are planned with safeguarding in mind.
- Identify the people and roles for which PVG/DBS consideration is required.
- Ensure new workers and volunteers are selected, inducted and supported appropriately.
- Include safeguarding as a regular committee governance item while protecting case confidentiality.
- Complete the Safeguarding Health Check when requested and work through agreed actions.
- Know how to contact the Provincial Safeguarding Team.

DLPs

- Be an accessible first point of contact for safeguarding concerns and questions.
- Receive concerns calmly and ensure immediate safety is considered.
- Keep clear, factual and secure records.
- Seek advice and make or support referrals to statutory agencies where required.
- Notify or consult the Provincial Safeguarding Team in line with Comhaltas procedures.
- Avoid investigating concerns themselves or asking leading questions.
- Support the Branch or Region to maintain safeguarding arrangements, training and awareness.

All staff, volunteers, tutors and leaders

- Follow this policy and role-specific safeguarding guidance.
- Maintain appropriate professional and volunteer boundaries.
- Report safeguarding concerns promptly.
- Do not investigate suspected abuse or neglect.
- Complete required safeguarding learning and safer-recruitment steps.
- Tell a DLP or the Provincial Safeguarding Team if they are unsure what to do.

5. Designated Liaison Persons (DLPs)

What is a DLP?

A Designated Liaison Person (DLP) is a named safeguarding contact within a Comhaltas Branch, Region or Province. The DLP provides an accessible point of contact when somebody has a safeguarding concern, needs advice about safeguarding practice, or is unsure what to do.

A DLP is not expected to be a social worker, investigator, counsellor, therapist or safeguarding lawyer. Their role is to help make sure concerns are received appropriately, immediate safety is considered, information is recorded factually, and the concern is passed to the right people. DLPs are supported by the [Provincial Safeguarding Team](#) and should seek advice whenever they are uncertain.

Who should be a DLP?

Each Branch and Region must appoint at least two DLPs. DLPs may hold other committee roles. Appointees should be approachable, reliable, able to handle sensitive information appropriately, willing to seek advice, and able to respond reasonably promptly when a concern is raised.

Where practicable, Branches and Regions are encouraged to consider gender balance when appointing DLPs. [Safeguarding concerns](#) can be extremely personal, and some people may feel more comfortable approaching a person of a particular gender. This should be considered alongside the suitability and availability of the individuals appointed.

I've just become a DLP - what do I need to do?

- Be visible and approachable. Make sure people know who the DLPs are and how to contact them.
- Know the basic safeguarding procedure, particularly what to do when someone raises a concern or makes a disclosure.
- Listen - do not investigate. Receive information calmly, establish whether anyone is in immediate danger, and avoid trying to prove or disprove what happened.
- Make sure concerns are recorded. Records should be factual, timely, confidential and stored appropriately.
- Notify or consult the Provincial Safeguarding Team through the agreed safeguarding route. Safeguarding concerns managed at Branch or Regional level should be brought to Provincial safeguarding attention.
- Know when outside help may be required. Seek Provincial support and contact statutory or emergency services directly where circumstances require it.
- Help maintain safeguarding arrangements locally, including visible DLP details, accessible safeguarding information, safer activity planning and appropriate PVG/DBS arrangements.
- Engage with safeguarding updates, refreshers, support and the Safeguarding Health Check.
- Ask for help. A DLP is not expected to deal with a difficult safeguarding situation alone.

What a DLP does not do

- Investigate allegations or interview children or witnesses.
- Decide whether somebody is telling the truth.
- Provide counselling or therapy.
- Confront a person who has been accused.
- Make legal judgements about whether something 'counts' as abuse.
- Promise to keep a safeguarding concern secret.
- Discuss confidential safeguarding case details with the wider committee unless there is a genuine safeguarding or governance need for particular individuals to know.
- Deal with a difficult safeguarding situation without seeking appropriate support.

Being a DLP does not mean dealing with safeguarding alone. If you are unsure what to do, contact the Provincial Safeguarding Team. Asking for advice is part of the role.

Safeguarding information is shared on a need-to-know basis. A committee may need to know that a safeguarding matter has been raised and is being managed, but it will not routinely need names, disclosure details, allegations, medical information or other confidential case material.

A person may contact the Provincial Safeguarding Team or statutory/emergency services directly where necessary. The DLP route must never become a barrier to reporting or immediate protection.

6. Creating safe Comhaltas activities

Good safeguarding starts before an activity begins. The level of planning should be proportionate to the activity, the participants, the setting and the reasonably foreseeable risks.

Planning and supervision

- Identify who is responsible for the activity and who participants can approach if they need help.
- Use a proportionate risk assessment for activities that involve additional safeguarding risks, including travel, overnight stays, one-to-one work, online delivery or participants requiring additional support.
- Plan staffing and supervision according to age, needs, group size, setting, activity and risk. Ratios are a planning tool, not a substitute for judgement.
- Where practicable, avoid a situation in which one adult is isolated and unobservable with a child. One-to-one tuition can be legitimate and valuable, but must be planned with appropriate safeguards.
- Make arrangements for arrival, collection and emergency contact clear where children are involved.
- Ensure emergency, medical and accessibility information is available to those who genuinely need it.

One-to-one activity

Comhaltas recognises that one-to-one tuition is a normal and important part of music and cultural learning. It is not prohibited. The objective is to make one-to-one activity transparent, accountable and appropriately safeguarded.

- Use a venue and room arrangement that is appropriate and, where reasonably possible, observable or interruptible.
- Make the arrangement known to the Branch/Region and, for children, to the parent or carer.
- Avoid unnecessary secrecy, private arrangements or changes of location that others do not know about.
- Use approved or appropriate communication channels.
- Review PVG/DBS eligibility by reference to the actual role and frequency.
- Record and report any boundary concern or incident.

Physical contact and personal boundaries

Physical contact must be appropriate to the activity, necessary or reasonably expected, and respectful of the person's dignity and wishes. Teaching sometimes requires demonstration of posture, hand position or movement; this should be explained, proportionate and, where appropriate, consent sought.

- Never use corporal punishment or degrading treatment.
- Never engage in sexualised behaviour, sexual contact, grooming, harassment or sexually suggestive communication with a child or a person over whom the worker holds safeguarding-related power or influence.
- Do not use physical restraint except where immediately necessary to prevent harm and only to the minimum extent reasonably required.
- Do not create relationships in which favouritism, dependency, gifts, secrecy or private contact undermine safe boundaries.

Alcohol, drugs and impairment

A person responsible for children or adults requiring safeguarding support must not be impaired by alcohol, illegal drugs or any substance that prevents them carrying out their safeguarding responsibilities safely. Activity-specific rules may impose stricter requirements.

Children and adults should be supported to maintain their independence, privacy and dignity. A worker or volunteer should not routinely undertake personal tasks for someone that the person can safely undertake themselves. Where personal assistance is genuinely required, it should follow agreed arrangements, the individual's needs and appropriate safeguarding boundaries.

- A child must not be taken alone to the private home of a tutor, volunteer, officer or activity leader as part of Comhaltas activity.
- A child must not be transported alone in the private vehicle of a tutor, volunteer, officer or activity leader as part of ordinary Comhaltas activity.
- A child must not be taken into or accommodated in an adult worker's bedroom during residential activity.
- These boundaries do not prevent proportionate action in a genuine emergency where immediate safety requires it; any such exceptional situation should be reported and recorded promptly.

7. Children and young people

Children and young people are members of the Comhaltas community in their own right. Safeguarding should support participation rather than unnecessarily restrict it.

- Listen to children and young people and take what they say seriously.
- Explain activities, expectations and boundaries in ways they can understand.
- Encourage participation and feedback, including opportunities to say when something feels uncomfortable or unsafe.
- Do not use humiliating, threatening, discriminatory or degrading language or discipline.
- Respect privacy in changing, sleeping and personal-care situations.
- Ensure children know who they can approach if they are worried about themselves or somebody else.
- Do not require a child to confront an alleged abuser or prove what happened.
- Where a concern exists, the child's safety and welfare take priority over the interests or reputation of an adult, a family, a Branch, a Region or the organisation.

Consent and parental involvement

Parents and carers should normally receive clear information about activities involving children, including arrangements for travel, photography, online participation and overnight stays where relevant. Consent must be meaningful and proportionate; it does not remove Comhaltas safeguarding responsibilities.

Children and young people should have meaningful opportunities to express their views about the activities in which they participate and, where appropriate, to contribute to planning, development and evaluation. Their views should be listened to and taken seriously in ways appropriate to their age and understanding.

8. Adults who may need additional safeguarding support

Adult safeguarding must be respectful and person-centred. Adults should not be infantilised or automatically treated as unable to make decisions because they have a disability, illness, support need or because another person assists them.

The relevant statutory test differs across Scotland, England and Wales. Comhaltas volunteers are not expected to make legal classifications themselves. Where there is concern about abuse, neglect, exploitation or risk of harm, the concern should be reported to a DLP and advice sought.

- Involve the adult in decisions about their safety wherever possible.
- Consider the adult's wishes, communication needs, capacity, relationships, independence and right to make choices.
- Do not assume that a carer or relative should always be the sole communication route.
- Take concerns about financial abuse, coercion, neglect, discriminatory abuse, domestic abuse, sexual abuse and exploitation seriously.
- Where immediate danger or serious crime is suspected, contact emergency services or the police as appropriate.

9. Safer recruitment, selection and induction

Membership information is held through the Comhaltas membership system and is managed in accordance with the Comhaltas in Britain Data Protection Policy and applicable data-protection requirements.

Branches and Regions should use an appropriate application or expression-of-interest process for safeguarding-sensitive roles. A standard Comhaltas template may be used, or an equivalent local form where it captures the necessary information. Appointments to safeguarding-sensitive roles should be confirmed in writing.

Background checks are one part of safer recruitment; they are not a guarantee of suitability. Comhaltas in Britain uses proportionate recruitment and selection safeguards according to the role.

- Define the role and the activities the person will actually carry out.
- Use an appropriate application or appointment process.
- Check identity and relevant experience or qualifications where the role requires them.
- Obtain and check references where proportionate to the role, particularly for roles involving regular responsibility for children or adults at risk.
- Review whether PVG/DBS checks or barred-list information are legally required or available.
- Explain safeguarding expectations, boundaries and reporting routes before or at the start of the role.
- Provide induction and role-appropriate safeguarding learning.
- Use supervision, probation, review or mentoring where appropriate.
- Reassess the role if duties change materially.

A criminal record does not automatically mean a person is unsuitable. Decisions must be lawful, fair, proportionate and relevant to the role. Where disclosure information is returned, it should be considered through the appropriate Comhaltas process with specialist advice where necessary.

10. PVG and DBS: background checks and barred-list safeguards

PVG and DBS requirements are determined by legislation and the activities of the role, not simply by a role title or by whether a person is paid or unpaid. Branches and Regions must not guess the required level of check.

10.1 Scotland – PVG

- From 1 April 2025, people carrying out a regulated role with children, protected adults, or both must be PVG scheme members for the relevant type of role.
- Comhaltas in Britain must ensure that appropriate confirmation of PVG membership is obtained before a person carries out a regulated role.
- The fact that a person is already a PVG scheme member through another organisation does not by itself confirm that Comhaltas has completed the checks or processes required for the Comhaltas role.
- From 1 April 2026, PVG membership operates on a five-year model, with Disclosure Scotland managing the transition of existing lifetime members in phases.
- Role eligibility must be reviewed if duties or circumstances change.
- Questions about whether an adult role involves a statutory protected adult should be referred to the Provincial Safeguarding Team rather than left to a Branch to decide alone.

10.2 England and Wales – DBS

- DBS checks must only be requested at a level for which the role is legally eligible.
- Where a role is regulated activity with children, the appropriate Enhanced DBS check with Children's Barred List information must be considered in accordance with the statutory framework.
- From 1 September 2026, the supervision exemption no longer removes otherwise qualifying child-related work from regulated activity simply because the volunteer is supervised.
- Historic assumptions based on a volunteer being 'supervised' must therefore be reviewed.
- A certificate obtained for another organisation is not automatically transferable to Comhaltas. The role, workforce, level of check, barred-list eligibility and any Update Service status must be considered.
- If a role changes, DBS eligibility should be reviewed again.

10.3 Organisational approach

Comhaltas in Britain is registered with appropriate processing organisations in each jurisdiction so that background checks can be arranged consistently for both volunteers and people in paid roles. Branches and Regions should use the Comhaltas in Britain process rather than making separate local arrangements unless this has been agreed with the Provincial Safeguarding Team.

Scotland. Comhaltas in Britain is registered with Volunteer Scotland for the processing of PVG background checks. This arrangement is used for qualifying volunteers and for people undertaking paid roles. The Provincial Safeguarding Team will support the appropriate application route and confirm the requirements that apply to the role.

England and Wales. Comhaltas in Britain works with the registered DBS umbrella body Aaron's Department, which processes DBS checks on our behalf for both volunteers and people in paid roles. Where appropriate, applicants are encouraged to use the DBS Update Service so that certificate status can be checked in future where the statutory conditions for using the service are met.

Operational guidance on PVG/DBS eligibility, application routes, fees, providers and the use of the DBS Update Service will be maintained outside this policy so that it can be kept current without requiring a full policy revision. The Provincial Safeguarding Team should be consulted where eligibility, the required level of check, portability or the correct application route is unclear.

11. Responding to a safeguarding concern or disclosure

The core response

Make sure everyone is safe. Listen calmly. Do not promise secrecy. Do not investigate or press for details. Make a factual record promptly. Report the concern promptly. The DLP / Provincial Safeguarding Team will consider referral or escalation.

Anyone may raise a safeguarding concern. It may relate to something that happened within Comhaltas, outside Comhaltas, online, historically, or in another organisation. A concern does not need to be proven before it is reported.

1. *Make sure everyone is safe*

If there is immediate danger, a medical emergency or an immediate risk of serious harm, contact the emergency services. Do not delay urgent action while waiting for a DLP.

2. *Listen calmly and take the person seriously*

Give the person time. Be supportive and non-judgemental. Do not express disbelief, blame or shock in a way that could discourage them.

3. *Do not promise secrecy*

Explain that information may need to be shared with people who can help keep them or somebody else safe.

4. *Do not investigate*

Do not ask leading questions, test the account, contact the alleged perpetrator, seek witnesses, search devices or try to establish proof. Clarifying only what is necessary to understand an immediate safety need is different from investigating.

5. *Make a factual record promptly*

Record what was said or observed as accurately as possible, including date, time, context, actions taken and who the concern was passed to. Distinguish fact from opinion.

6. *Report promptly*

Report to a Branch or Regional DLP. Where the concern relates to a DLP, or the local route is inappropriate or unavailable, contact the Provincial Safeguarding Team directly.

7. *DLP / Provincial safeguarding action*

The safeguarding lead will consider immediate risk, statutory referral, police involvement, allegation-management procedures, DBS/Disclosure Scotland duties, organisational protective action and support.

8. *Continue to support appropriately*

Do not discuss the concern widely. Follow advice about communication with the person, parents/carers, the person who raised the concern and any person who is the subject of an allegation.

12. Concerns or allegations about a staff member, volunteer or person in a position of trust

Concerns about a person working or volunteering with children or adults at risk require careful handling. They may involve alleged abuse, a criminal offence, behaviour indicating a risk of harm, a breach of professional boundaries, or information from the person's private life that may be relevant to their suitability.

The concern must be reported immediately to a DLP and the Provincial Safeguarding Team. If the concern is about a DLP, it must be reported to another DLP or directly to the Provincial Safeguarding Team. If the concern involves a member of the Provincial Safeguarding Team, it must be escalated to an appropriate senior officer/Provincial office bearer not implicated in the concern and, where required, directly to the relevant statutory authority.

Immediate organisational actions may include

- Taking steps to secure the immediate safety of children or adults at risk.
- Temporarily changing duties, supervision or access while advice is obtained.
- Preserving records and evidence without conducting an internal investigation that could prejudice statutory enquiries.
- Seeking advice from the relevant local authority safeguarding/allegations route or police.
- Considering whether a suspension or other neutral protective measure is necessary and proportionate.
- Providing appropriate support and information to the person who raised the concern and to the person who is the subject of the allegation, without compromising the safeguarding process.

Jurisdiction-specific allegations routes

In England, concerns about people working with children may need referral to the Local Authority Designated Officer (LADO) or equivalent local allegations-management service. In Wales, the Wales Safeguarding Procedures Section 5 applies to safeguarding concerns about practitioners and people in positions of trust. In Scotland, advice/referral may involve local social work/child protection or adult protection services and Police Scotland according to the circumstances.

Any disciplinary process must be coordinated with statutory safeguarding or criminal processes. An internal finding of 'no disciplinary case' does not automatically mean that no safeguarding action or referral duty exists, and vice versa.

13. Poor practice, boundaries and lower-level concerns

Not every concern meets the threshold for statutory safeguarding intervention. Poor practice and boundary concerns still matter because they can harm participants, undermine trust or indicate a developing pattern.

- Repeated unnecessary private messaging with a child.
- Favouritism, gifts or creating dependency.
- Regularly arranging unplanned or undisclosed one-to-one contact.
- Humiliating, intimidating, discriminatory or aggressive behaviour.
- Ignoring agreed photography, transport, changing-room or overnight arrangements.
- A pattern of breaching role boundaries or dismissing safeguarding guidance.
- Failure to report a concern.

Lower-level concerns should be recorded and reviewed through the appropriate management or safeguarding route. Patterns must be considered. Where information suggests a child or adult may be at risk of harm, it must be treated as a safeguarding concern rather than only a conduct matter.

14. Events, travel, overnight stays and exchanges

Every Branch, Regional or Provincial event must have a named Event Safeguarding Officer. This includes Fleadhanna, competitions, concerts, festivals, workshops and other organised activities where safeguarding arrangements are required.

- Every Fleadh Committee must appoint a named Event Safeguarding Officer as part of its event planning. The person may already be a Branch, Regional or Provincial DLP.
- The Event Safeguarding Officer's name and information about how to contact or locate them must be clearly communicated and readily visible to participants, parents/carers, volunteers, tutors, officials and visitors.
- The Event Safeguarding Officer provides an accessible point of contact during the event and ensures concerns are handled under this policy. The role does not replace normal DLP or Provincial escalation arrangements.
- Event organisers must consider first-aid and welfare provision as part of event planning. For larger events, Fleadhanna, festivals, competitions and similar activities, a named person with appropriate current first-aid competence should be identified and their location or contact arrangements made known.
- The current Safeguarding Concern Flowchart and relevant DLP/Event Safeguarding Officer contact information should be readily visible and accessible at Comhaltas locations and events.

Events, Fleadhanna, trips, residential activities, exchanges and international travel may involve safeguarding risks that are different from regular weekly activity. The organising body must be clear about which safeguarding responsibilities it holds and which are held by another organiser.

- Name an activity lead and safeguarding contact.
- Identify participants, supervision arrangements and any additional support needs relevant to safety.
- Use appropriate consent, emergency and medical arrangements for children.
- Plan transport, accommodation, sleeping arrangements, changing and private spaces.
- Avoid adults sharing bedrooms with children except where a clearly justified care arrangement requires it and has been specifically risk assessed and agreed.
- Set expectations for alcohol, behaviour, curfews, communication and social media where relevant.
- Plan what happens if a participant becomes unwell, goes missing, is distressed, discloses harm or needs to leave early.
- Where host families are used, apply a specific host-family safeguarding process.
- For cross-border or international activity, identify which legal jurisdiction and referral routes may apply and seek Provincial advice in advance.

15. Online activity, messaging, photography and media

Digital communication

- Use communication channels appropriate to the role and participant age.
- Avoid secret, disappearing or unnecessarily private communications with children.
- Where direct communication with a young person is necessary and appropriate, use transparent arrangements agreed by the organisation and, where appropriate, parents/carers.
- Do not use sexualised, threatening, discriminatory or boundary-crossing messages.
- Keep relevant safeguarding communications where they may be needed as a record.

Online teaching

Online one-to-one teaching should follow the same principles of transparency, appropriate boundaries and accountability as in-person tuition. The setting visible on camera, platform used, recording arrangements and presence/proximity of another responsible adult should be considered according to age and risk.

Photography, video and livestreaming

- Tell participants and parents/carers how images may be used.
- Use appropriate consent or lawful organisational arrangements.
- Avoid images that are intrusive, demeaning or unnecessarily identify sensitive personal information.
- Do not publish personal contact details or other information that creates avoidable safeguarding risk.
- Respond promptly to concerns about inappropriate photography, filming, image-sharing or livestreaming.

16. Recording, confidentiality and information sharing

Safeguarding records must be accurate, proportionate, secure and accessible only to people who need them for safeguarding, governance or legal reasons.

- Record facts, the source of information, decisions, advice obtained and actions taken.
- Do not include speculation as fact.
- Do not place confidential safeguarding case detail in routine committee minutes.
- Share information on a need-to-know basis and in line with data protection law.
- Do not promise absolute confidentiality where someone may be at risk.
- Keep safeguarding records separately from routine membership or activity records where appropriate.
- Retain and dispose of records in accordance with Comhaltas data-protection and safeguarding retention arrangements.

Data protection law is not a reason to withhold information where sharing is necessary and proportionate to protect a child or adult from harm or to meet a legal obligation. Where there is uncertainty, seek safeguarding and data-protection advice promptly.

17. Training, support and the Safeguarding Health Check

Comhaltas in Britain wants safeguarding to be understood and usable in practice. Training and support should reflect the person's role rather than expecting all volunteers to have the same level of specialist knowledge.

Training and support

Comhaltas in Britain does not currently prescribe a universal three-year safeguarding training cycle. Safeguarding information, role-specific learning and refreshers should instead be provided when necessary, including when responsibilities, practice, risk or legal requirements change.

- All relevant staff and volunteers should receive safeguarding information appropriate to their role.
- DLPs should receive enhanced role-specific support and training.
- Tutors and activity leaders should understand boundaries, disclosures, one-to-one practice, digital communication and relevant PVG/DBS arrangements.
- Trip and event leaders should receive activity-specific safeguarding guidance.
- Refresher learning should be provided when practice, risk, roles or legal requirements change.

Safeguarding Health Check

Safeguarding Health Check: <https://www.comhaltas.co.uk/safeguarding-health-check>

Branches and Regions will participate in the Comhaltas in Britain Safeguarding Health Check at intervals set by the Province. The Health Check is a practical, supportive review designed to recognise what is already working, identify things to check, agree actions and connect Branches and Regions with support.

- It is not a pass/fail test or league table.
- It asks factual questions and does not expect volunteers to interpret safeguarding law.
- A response of 'not sure' should lead to checking or support, not be treated automatically as a failure.
- The Health Check should distinguish Comhaltas requirements, legal/regulatory considerations, recommended good practice and support/development opportunities.
- It must not be used to submit details of an actual safeguarding concern.
- Before final submission, Provincial monitoring may show completion progress, but routine incomplete response data should not be treated as a safeguarding case file.
- Following submission, findings may inform an agreed Branch/Regional action plan and organisation-wide support priorities.

18. Whistleblowing, complaints and speaking up

Anyone involved in Comhaltas in Britain should be able to raise a safeguarding concern in good faith without fear of retaliation. A person does not need permission from a committee or line manager to contact the Provincial Safeguarding Team, statutory safeguarding services or the police where they believe this is necessary.

A complaint about service quality, disagreement or behaviour may be handled through an ordinary complaints or conduct process. However, if a complaint includes information suggesting abuse, neglect, exploitation or risk of harm, the safeguarding process takes priority.

19. Governance, assurance and review

The Provincial Council is responsible for approving this policy and ensuring it remains effective. The Provincial Safeguarding Team will support implementation and advise on necessary updates.

- The policy will be reviewed at least annually.
- An earlier review will take place following significant changes in law, statutory guidance, organisational structure, learning from a serious incident, or material findings from Health Checks.
- Operational guidance, forms, contact routes and PVG/DBS process notes may be updated between formal policy revisions where the underlying policy principles remain unchanged.
- Material policy changes must be approved through the appropriate Comhaltas governance route.
- Branches and Regions must use the current published version and associated current resources.

Appendix A – Jurisdiction and legal Framework

This appendix is a high-level reference, not an exhaustive statement of law.

<i>Jurisdiction</i>	<i>Key safeguarding framework</i>	<i>Background-check framework</i>
<i>Scotland</i>	National Guidance for Child Protection in Scotland 2021 (updated 2023); Adult Support and Protection (Scotland) Act 2007 and Code of Practice.	Protection of Vulnerable Groups (Scotland) Act 2007 as amended; Disclosure (Scotland) Act 2020; regulated roles; mandatory PVG membership; five-year membership model from 1 April 2026.
<i>England</i>	Children Acts 1989 and 2004; Working Together to Safeguard Children; Care Act 2014 and statutory guidance.	Safeguarding Vulnerable Groups Act 2006 / DBS framework. Supervision exemption for regulated activity with children removed from 1 September 2026.
<i>Wales</i>	Social Services and Well-being (Wales) Act 2014; Working Together to Safeguard People; Wales Safeguarding Procedures.	DBS framework for England and Wales. Supervision exemption removed from 1 September 2026. Wales Safeguarding Procedures Section 5 covers allegations/concerns about practitioners and people in positions of trust.

Authoritative sources used for this revision

- **Current Comhaltas in Britain Safeguarding Policy (2024 Revision):**
https://www.comhaltas.co.uk/_files/ugd/a00e35_ea188a964f414fcca24274d88a3ffcc.pdf
- **Disclosure Scotland – regulated roles and PVG legal requirement:**
<https://www.disclosure.gov.scot/news/2025/02/regulated-roles-and-pvg>
- **Disclosure Scotland – five-year PVG scheme membership:** <https://www.disclosure.gov.scot/news/2026/04/five-year-pvg-scheme>
- **DBS – change to regulated activity with children from 1 September 2026:**
<https://www.gov.uk/government/news/change-to-the-definition-of-regulated-activity-with-children-from-1-september-2026>
- **DBS / DfE – regulated activity: removal of the supervision exemption:**
<https://www.gov.uk/government/publications/working-or-volunteering-in-regulated-activity-with-children/regulated-activity-removal-of-the-supervision-exemption-comes-into-force-1-september-2026>
- **Scottish Government – National Guidance for Child Protection in Scotland 2021, updated 2023:**
<https://www.gov.scot/publications/national-guidance-child-protection-scotland-2021-updated-2023/>
- **Scottish Government – Adult Support and Protection (Scotland) Act 2007 Code of Practice:**
<https://www.gov.scot/publications/adult-support-protection-scotland-act-2007-code-practice-3/>
- **GOV.UK – Care and support statutory guidance:** <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>
- **Wales Safeguarding Procedures:** <https://safeguarding.wales/en/>

Appendix B – Safeguarding contacts

Branch and Regional DLP contact details should be displayed locally and kept current. The Province should maintain a current online safeguarding contact page so this policy does not become out of date when personnel change.

<i>Contact</i>	<i>Name / role</i>	<i>Details</i>
<i>Provincial Safeguarding Team</i>	Provincial Safeguarding Officer / Provincial DLPs	Use current Comhaltas in Britain safeguarding contact page.
<i>Provincial Safeguarding Officer</i>	Paddy Callaghan	paddy@comhaltas.co.uk 07708 949919
<i>Emergency</i>	Police / ambulance / emergency services	999 or 112 where there is immediate danger or emergency.
<i>Branch / Regional DLPs</i>	Complete locally	Names, email addresses and telephone numbers should be displayed at the activity venue and/or online.

Appendix C – Glossary

<i>Term</i>	<i>Meaning</i>
<i>Abuse</i>	A form of maltreatment or harmful treatment. Depending on context, this can include physical, sexual, emotional/psychological, financial, discriminatory or organisational abuse, neglect, domestic abuse, exploitation and online harm.
<i>Barred list</i>	A statutory list of people barred from carrying out specified regulated activity or regulated roles.
<i>DBS</i>	Disclosure and Barring Service, which provides criminal-record checking and barring functions in England and Wales.
<i>DLP</i>	Designated Liaison Person – a Comhaltas safeguarding lead.
<i>LADO</i>	Local Authority Designated Officer, or equivalent local allegations-management function in England, for concerns about adults working with children.
<i>PVG</i>	Protecting Vulnerable Groups scheme operated by Disclosure Scotland.
<i>Regulated activity</i>	A statutory concept used in the DBS framework to define certain work with children or adults and determine barred-list restrictions/eligibility.
<i>Regulated role</i>	The Scottish statutory concept introduced under the reformed disclosure framework for roles requiring PVG scheme membership.
<i>Safeguarding</i>	The arrangements used to prevent harm, promote welfare and respond to concerns about abuse, neglect, exploitation or risk.

Appendix D – Core supporting resources

Safeguarding Health Check

A practical, supportive review for Branches and Regions, with action planning and links to safeguarding support.



These practical resources sit alongside this policy and can be updated operationally without rewriting the policy itself. Select a green underlined title when viewing electronically, or scan the QR code when using a printed copy.

Safeguarding Concerns: What to Do

Quick-response guidance for anyone who receives a safeguarding concern or disclosure. This replaces the former Appendix A quick-response page.



Safeguarding Concerns: DLP Flowchart

Decision guide for DLPs covering concerns about staff/volunteers, possible abuse outside Comhaltas and the route from concern to referral.



Safeguarding at this Event

Display poster identifying the safeguarding contact for an event and directing attendees to safeguarding help and resources.



Supervision & Ratios

Practical guidance on supervision ratios, minimum staffing and circumstances in which additional supervision may be needed.



Safer Recruitment & Application Pack

Safer-recruitment guidance and a template application form for volunteer and paid safeguarding-sensitive roles.



Recognising Safeguarding Concerns

Practical guide to possible signs and indicators of abuse, neglect, exploitation and other safeguarding concerns.



I've Become a DLP – Practical Guide

A practical introduction to the DLP role: what to do locally, what not to do, confidentiality, PVG/DBS and event safeguarding.



Safeguarding Induction Checklist

Structured induction checklist for tutors, volunteers, officers, DLPs and other safeguarding-sensitive roles.



Event Safeguarding Checklist

Pre-event planning checklist covering the named Event Safeguarding Officer, supervision, background checks, first aid and reporting arrangements.



Accident / Incident Report Form

Consistent form for recording accidents and incidents, immediate action, witnesses, notifications and follow-up.



Branch / Region DLP Safeguarding Contacts Poster

Local display template for current DLP names and contact details.



Safeguarding Health Check

The practical, supportive Branch and Region review tool described in section 17 of this policy.



