

National Gallery of Ireland
Vulnerable Adult Safeguarding Interim Protocol

1. Nature of organisation and principles to safeguard Vulnerable Adults from harm

The National Gallery of Ireland (the **Gallery**) is Ireland's major national cultural institution devoted to the collection and care of fine art. The collection currently comprises some 16,000 paintings, drawings, watercolours, miniatures, prints, sculpture and decorative arts. The Gallery employs more than 185 staff and provides free access to the public 361 days a year.

The Gallery aims to safeguard the welfare of its visitors by ensuring they are treated with dignity and respect, and that they are safe and protected from harm whilst visiting our premises and while engaging in Gallery-run activities offsite and online.

The Gallery engages with vulnerable adults chiefly through our Diversity, Equity, Accessibility and Inclusion ("DEAI") programming. This includes, but is not limited to: offsite workshops with disability service providers and in community settings; onsite tours, workshops and activities for community and healthcare groups; online workshops and events. The Gallery takes the definition of "Vulnerable Adults" from guidance issued by the HSE, Social Care Division. The Gallery, for the purposes of this protocol, considers a Vulnerable Person as an adult who may be restricted in capacity to guard himself / herself against harm or exploitation or to report such harm or exploitation. Restriction of capacity may arise as a result of physical or intellectual impairment. Vulnerability to abuse is influenced by both context and individual circumstances.

While the primary responsibility for the welfare of vulnerable adults who require support to access the Gallery's services and activities rests with their organisations, and/or carers, the Gallery strives to ensure that all vulnerable adults are protected from harm on the premises, and while engaging in Gallery-run activities offsite and online.

All staff, guides and creative practitioners who undertake work with vulnerable adults will be required to read this statement and be guided by its contents.

This Interim Protocol is also published prominently on our website and is available in the Gallery to carers, relevant organisations, and any member of the public upon request from any member of our Visitor Experience or Education Department staff.

2. Risk Assessment & Procedures

We have carried out an assessment of any potential for harm to a vulnerable adult while availing of our services. Below is a list of the areas of risk identified and the list of procedures for managing these risks.

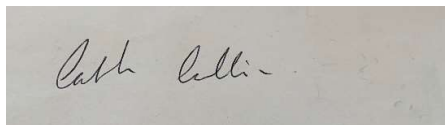
	Risk identified	Procedure in place to manage risk identified
1.	Incident of inappropriate behaviour by a member of staff	<ul style="list-style-type: none"> • Work practices continuously evaluated and guidelines and training updated as appropriate <p>The Gallery aims to comply fully with all relevant legislation, including:</p> <ul style="list-style-type: none"> • S.I. No. 146/2000 - Industrial Relations Act, 1990 (Code of Practice on Grievance and Disciplinary Procedures) (Declaration) Order, 2000 • Protected Disclosures Act, 2014 • Employment Equality Acts, 1998 – 2015 • Safety, Health and Welfare at Work Act, 2005 <p>The Gallery also has the following Policies and Procedures in place to assist with such compliance:</p> <ul style="list-style-type: none"> • HR32 Speak Up Policy 2019 • 2015 Dignity at Work Policy • Circular 2016/19: Civil Service Disciplinary Code: Joint Industrial Council for State Industrial Employees Code of Practice on Disciplinary Procedures & Code of Practice on Grievance Procedures • Circular 11/2001 Revised procedure for dealing with grievance problems <p>In addition, the following services are available to staff:</p> <ul style="list-style-type: none"> • Civil Service Employee Assistance Service (CSEAS): Ms. Deirdre Farrell

	Risk identified	Procedure in place to manage risk identified
		<p>Deirdre.Farrell@per.gov.ie 0761 100 037</p> <ul style="list-style-type: none"> • Chief Medical Office (CMO) for medical queries: casereferral@cmo.gov.ie • HSE Safeguarding representative for South Dublin City • If the inappropriate behaviour is criminal in nature, the Gardaí will be informed, in accordance with the Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012.
2	Recruitment of an inappropriate person	<ul style="list-style-type: none"> • Recruitment and selection policy procedures in place for all staff, facilitators and volunteers – details are outlined in the HR10 Recruitment Procedure 2020 • All interview panellists are required to attend Gallery-approved training for interviews. • The Gallery has an ongoing commitment to Training and Development, which is completed every year.
3	Breach of trust by employees, volunteers or facilitators	<ul style="list-style-type: none"> • Work practices continuously evaluated and guidelines and training updated as appropriate. • In limited circumstances, the Gallery's CCTV footage may be reviewed in the context of an investigation of an alleged incident and, if applicable, shared with An Garda Síochána where the incident is criminal in nature
4	Online Engagement	<ul style="list-style-type: none"> • In situations where NCI staff are interacting with vulnerable adults online or digitally, the principle that the online space is an extension of the physical space should apply. All activities should be fully risk-assessed to ensure adherence to the child protection policy and other relevant policies including the Gallery's Data Protection Policy and Privacy Notice • When working digitally, staff should always adhere to the same code of behaviour and reporting procedures and policies as set out in this document.

	Risk identified	Procedure in place to manage risk identified
		<ul style="list-style-type: none"> • Access to inappropriate internet sites prohibited by the use of filters on public access WiFi • All data relating to vulnerable adults is protected in line with the Data Protection Policy. • Where photos of vulnerable adults appear on our website/social media, permission has been sought and granted by the adult, and the adult's carer or guardian, and the permission form is kept securely on file in the Education Department.
5	Incident of inappropriate behaviour by a member of the public while in the Gallery	<ul style="list-style-type: none"> • Security posted at all entrances • Security throughout the Gallery • In limited circumstances, the Gallery's CCTV footage may be reviewed in the context of an investigation of an alleged incident and, if applicable, shared with An Garda Síochána where the incident is criminal in nature • If the inappropriate behaviour is criminal in nature, the Gardaí will be informed in accordance with the Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012.

3. Implementation

We recognise that implementation is an ongoing process. The Gallery is committed to the implementation of this Interim Protocol and the procedures that support our intention to keep vulnerable adults safe from harm while visiting and interacting with the Gallery. Should any legislation specific to the protection of vulnerable adults come into place, we will ensure that we are fully compliant. This Interim Protocol will be reviewed biannually in January, or as soon as practicable after there has been a material change in any matter to which it refers.



Signed:

Catherine Griffin, Head of Public Engagement, National Gallery of Ireland

For queries, please contact Educationteam@ngi.ie

Approved by Education & Public Engagement Committee on 23 November 2020.