



## **RLI Vetting Policy (including sharing of information)**

### Introduction

Vetting (both Garda Vetting and Access NI) is now available to all rugby league clubs and organizations through the appointment of an Authorized Signatories (Liaison Persons\*) and the registration of RLI with the National Vetting Bureau and Access NI (Registered Body).

The decision to engage in vetting is part of RLI's safeguarding standards to protect the welfare of children and vulnerable adults within Irish Rugby League.

All leaders (paid & voluntary) with regular and continuous access to young people and vulnerable adults, and for NI, those within unsupervised regulated activity and/or a supervisory role of those with regular and continuous contact with young people will be required to partake of the vetting process. This is necessary within safeguarding standards for Irish Rugby League. Failure to successfully complete the process may result in disqualification from appointment to a position within the Irish Rugby League, (see below for who needs to complete the process).

At present the cost to the person vetted in ROI is €10. RLI requires re-vetting on any change of position or after 3 years (whichever is sooner). The vetting process will take approximately 2-weeks. This must be considered when recruiting leaders as a person must be vetted before they commence a role working with young people. No person under 18 years of age may undergo a vet, unless with signed parental permission. All vets will be carried out in line with the Code of Practice for ANI (NI) and the NVB (ROI).

It should be noted that the National Vetting Bureau (GCVU) and Access NI do not provide 'clearance' for people to work with children and vulnerable adults; the vetting organisation (RLI) receives relevant information and decides on the suitability of the applicant. RLI is committed to equal opportunities for all and does not preclude applicants with criminal convictions, (see Appendix 1 for further details). Convictions will only be considered when relevant to the position that the applicant has applied for. Applicants whose vet returns information in relation to their criminal record will be judged on a case-by-case basis and positive disclosures do not necessarily preclude a person from taking a role within Irish Rugby League. Applicants may be contacted to discuss relevant risks so that RLI can reach a safe and fair recruitment decision.

### Who will be required to be vetted?

All persons within rugby league with access to children on a regular and continuous basis and those making decisions regarding the welfare of children at local, regional and national level will be vetted.

### Sample Positions

- All 'Leaders' (paid and voluntary), including part-time and support staff used on club Age-Grade activities, provincial squads and national squads, that work with young people on a regular basis



- All 'Leaders' (paid and voluntary), who may be required to regularly work with young people at events or for specific Age-Grade projects; or who may be involved in decision making in relation to young people, e.g. Chair of Youth Committee
- Referees who may be affiliated to a club/team(s) on an on-going and are likely to come into contact with same young people on a regular basis

There may be others who have contact with young people and/or vulnerable adults who, although may not need to complete the vetting process will be required to comply with the RLI's code of conduct, including the completion of self-declaration questions, e.g. parents who assist on an occasional basis.

### **Vetting Procedure**

to be carried out the RLI National Children's Officer and Garda Vetting Officer

RLI's registered Liaison Person with the National Vetting Bureau and the Lead Signatory with ANI will

- Act as liaison between National Vetting Bureau & Access NI and applicants seeking a vet
- Be responsible for distribution of all vetting application forms, submissions to and information received from the unit, both in paper and electronic forms.
- Responsible for maintaining the confidentiality of information received from both the individual and the Unit

### **Process**

- RLI ID form is available on request from [NCO@rli.ie](mailto:NCO@rli.ie)
- Vetting will be done as part of a club recruitment process that includes evidence of an applicant's signed code of behaviour and declaration of intent and agreement to attend training
- An ID check will be completed by the Club (Welfare Officer/Youth Coordinator, etc.) which will also include the applicant's permission to vet
- Form to be completed by the applicant and returned to the RLI. For e-vetting an email is sent to the applicant with the link to the relevant vetting portal.
- Disclosure is sent to RLI and to the applicant. On successful completion of vetting approval is emailed to the club/relevant organisation to complete recruitment process.



## Applicants

- Should complete forms accurately, including date of birth and email.
- Should declare prosecutions/convictions at the time of application - RLI will risk assess and decide which may affect the position/role (whether paid or voluntary) & must be communicated to prospective Leaders
- All information should be held in compliance with relevant Data Protection Acts.

Any individual will be required to be re-vetted on changing their position within the organisation. Exclusions to this are:

- an individual changing position but remaining on the same committee, e.g. moving from Safeguarding Committee officer to Chair within the same committee
- an individual progressing their qualification but remaining in the same position within either club or private sector e.g. moving from a Stage 1 to Stage 2 coach
- an individual in an existing group taking on a second position at Club or Regional level e.g. club coach working with origin squads

All individuals will undergo re-vetting after 3 (three) years. Individuals who have completed vetting within rugby league within the last 12-months may use their current vet under the 'sharing information' protocol within this policy.

## Completing the vetting forms

The vetting application form is required to be fully completed; using notes provided. The identification verification form must be completed. Confirmation of an individual's identity must be verified by either Club Welfare Officer or suitable Age-Grade rugby personnel in the club. Any forms not completed will be returned unprocessed - this will hold up the overall process

## Residency Abroad

Any individual resident for less than one year (taken from the date of the initial vetting application) in either Ireland or Northern Ireland will be checked again one year later and again after another 12-months. If a police check has been obtained from the individual's originating country (possibly accepted on submission of original information to the Authorised Signatory) vetting will only be required after 6 months and again one year later (i.e. 2 checks plus originating country police check in 18 months).



## Completed Application forms

Applicants for vetting will be entered on a separate database by the Liaison Person / Authorised Signatory with the following information:

- Name
- DOB
- Current address
- Date of submission to vetting authorities (batch number for NVB)
- Date of completed vet (Cert number for ANI, Reference number for NVB)
- Court Result
- Agreement checks from ID check

## Storage

All data is kept in accordance with the Data Protection Acts 1988, the amended Act 2003 and the UK Data Protection Act 1998 and held by the Authorised Signatory on behalf of RLI and Sport Ireland. All relevant information is kept in a secure location with Rugby League Ireland. The Authorised Signatories are the only key holders for the secure cabinet and the database in password protected.

## Return of information

The original application form will be returned with any disclosed information to the AS from GVCU and an ANI vet will be tracked online. On return, the original forms will be shredded and relevant information inputted to the vetting database. Each application will be examined by the AS to determine the suitability of the applicant for the position, whether new/presently in situ.

## Processing the disclosed information

The assessment of suitability will depend on the nature of the position, the self-disclosure of any prosecutions or convictions and the seriousness, timing and any possible pattern that emerges of any information disclosed. The integrity of the applicant with regard to self-disclosure or lack of disclosure on the initial application form will be considered.

On receiving information that may preclude the applicant, the original application form will be checked for each detail to ensure it is correct and that the disclosed information refers to the applicant.



If the applicant has self-disclosed the information and this agrees with the disclosure from the vetting authorities the decision must be made based on the type and nature of the offences disclosed.

If the applicant has not self-disclosed and information is received from the authorities the information will be checked with the applicant.

Disclosure of certain types of convictions/prosecutions may automatically preclude the applicant from a position working with children. Examples of offences that may prohibit an applicant are:

- Any offence of a sexual nature
- Any offence against a child or of child abuse or pornography
- An offence that causes gross bodily harm
- An offence of kidnapping
- A series of continuous offending that might cause concern for the well-being of children

All decisions on the suitability of an applicant are a matter for RLI and the safeguarding risk assessment committee and will be done on a strictly confidential basis.

The Authorised Signatories have a responsibility to observe professional standards and will be cautious to recognise their own values and personal ethics in evaluating the seriousness and the relevance of an offence. They will also complete relevant training by Sport Ireland.

#### Communication

When the AS is required to communicate with the applicant for any reason the following protocol will be adhered to:

- Communication should be by phone or in person if convenient
- The AS will verify the person is the applicant
- No messages will be left
- No discussion will take place with any other person, spouse or partner
- The AS will give an assurance of confidentiality



If the AS is required to verify disclosed details the applicant will be asked:

- Is there anything they remember concerning the time of the offence
- Have they have ever been to court
- For any relevant information concerning the disclosed information
- To consider the significance of the disclosure in relation to the position applied for

All responses should be noted. If any of the information is disputed the Disputes procedure in this policy (see below) must be followed.

#### Data Security & Sharing of Information

The data submitted by the applicant and any responses from the vetting authorities is subject to data security.

RLI will only release information concerning the suitability of an individual to a person who needs to know in order to protect young people and where there is a specific purpose in doing so. In the event that an applicant withdraws either their application for a position or from their position, information concerning their suitability for working with children will not be released without first consulting the applicant.

Should an applicant wish to share their vetting information they may request that another organisation emails the Liaison Person/Lead Signatory who will confirm the date on which the vet was completed and any information that was discovered at the time. The requesting LP/LS, as the requesting organisation, shall use this information accordingly and RLI will not be responsible for their employment decision.

RLI will not accept a vet from another organisation unless related to rugby (e.g. RLEF ) and vetting thresholds can be established. Where an acceptable vetting process is established, the RLI will request the applicant's permission to share the vetting information that has been obtained within the last 12-months.

In accordance with the rules laid down in the Data Protection Acts 1988, the amended Act 2003 and the UK Data Protection Act 1998, the Authorised Signatories on behalf of IRFU will:

- Obtain and process information fairly
- Keep this information only for one or more specified, explicit and lawful purposes
- Use and disclose information only in ways compatible with these purposes



- Keep information safe and secure
- Keep information accurate, complete and up to date
- Ensure that any information is adequate, relevant and not excessive
- Retain information for no longer than is necessary for the purpose or purposes
- Give a copy of his/her personal information to an individual, on request

## Disputes

### Disputing Disclosed Information

Both GVCU and ANI have procedures in place to deal with disputes. If an applicant believes the information disclosed about them is inaccurate, they should contact the Registered Body (RLI).

The NVB /GV Unit has a dispute mechanism in place in event of an individual contesting the disclosed information. In the case of any disclosure being disputed by the applicant the following procedure will be applied:

- The exact basis of the dispute will be noted by the AS on communication with the individual
- The original application form will be resubmitted to the unit for a recheck - containing a covering report outlining the basis of the dispute as indicated by the applicant

If following a recheck the applicant still disputes the information, arrangements with the Unit will be made for further identification procedures to be conducted in order to resolve the dispute.

For ANI, the dispute must be raised in writing to ANI, quoting the certificate reference number, the full name, address and postcode of the applicant and the letter must clearly identify the nature of the dispute. There is a three-month limit (90 days) from the date of issue of a certificate in which to raise a dispute.

Where an error can be attributed to ANI, or the accuracy of the information disclosed, it will be corrected and ANI will issue a replacement Disclosure Certificate to the applicant. Where a dispute is traced to an error by either the UB (RLI) or applicant, ANI will require a fresh Disclosure Application with the fee where applicable.

Until all disputes have been settled the individual will not be able to take any position within IRFU. If the dispute involves existing personnel it is recommended that supervision be put in place until the dispute resolved.

All decisions on the suitability of an applicant following a recheck are a matter for RLI and the vetting authorities are not to be involved in such decisions.