

GARDA VETTING POLICY

Category	Recruitment and Selection
Policy Name	SVP Garda Vetting Policy and Procedures
National Management Council (NMC) Approval date:	23 rd March 2024
Reference	GV006
Policy Web Page	www.svp.ie/safe-guarding

Revision History

Version	Revision Date	Revised by	Section Revised
GV007	January 2024	Bernadette Casey	Section 4.3 revised for retention NVB forms, ID and proof of address in accordance with SVP data retention policy. Section 4 requirement for complete address history.
GV006	April 2023	Bernadette Casey	Section 1 (Policy) - NVB definitions of child and vulnerable person. Section 2 moved to Section 4 and rewritten for clarity. Section 5 updated to include new procedure for escalation of non-engaging applicant. Section 9 moved to 8 and updated to include the steps for how a disclosure is processed. Section 8 moved to 9, process for dealing with disclosures updated with sub sections on pending cases and spent convictions. Appendix 1 – Expanded description of the duties of a Liaison Person role. Appendix 2 - Role of Clerk User simplified. Appendix 5 – Outline of vetting disclosure process including template for Decision Making Committee Meeting. Appendix 6 – Outlining volunteer sabbatical procedure. Appendix 7 - Detailing how delayed vetting applications are managed.

			Amended wording on pages 4 and 9 – to allow SVP to revert within the 3 years if required.
GV005	November 2019	Mandy Nordell	Centralises GV administration.
GV004 Procedure	1 st April 2019	Mandy Nordell	<p>-Procedure for eVetting requirement to scan and store data to CRM.</p> <p>-NVB 1 Form, ID documentation (ID Verification Form and two types of verified signed ID) are scanned to one PDF file by Contact Person and stored to the vetting subject/applicant's profile on the CRM.'</p> <p>-Changes to roles that require vetting – see Section 4 (pg 6) and Appendix 4 (pg 12).</p> <p>-Supervision and support for ex-offenders Section 11 (pg 8) updated.</p>
GVO03 Policy Statement	1st April 2019	Mandy Nordell	No change.

Document Control

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1. PURPOSE

The purpose of this policy is to provide guidance on Garda Vetting practices within SVP.

The purpose of Garda Vetting is to provide details regarding all 'Specified Information', convictions, pending or completed, in respect of an individual applicant to an organisation which is registered for Garda Vetting.

The National Vetting Bureau provides potential employers and voluntary sector organisations with relevant criminal history information on individuals applying for relevant work. Disclosures are issued which give details of an individual's criminal convictions or state that they have none. Using these disclosures assists SVP in recruitment decisions, helping to protect children and vulnerable persons.

DEFINITIONS

Under the National Vetting Bureau (Children and Vulnerable Persons) Act 2012-2016 the following definitions apply:

- A child is:
 - “a person under the age of 18 years, excluding a person who is or has been married”.
- A vulnerable person is defined in the National Vetting Bureau (Children and Vulnerable Persons) Act 2012-2016 as a person, other than a child, who —
 - a) is suffering from a disorder of the mind, whether as a result of mental illness or dementia
 - b) has an intellectual disability,
 - c) is suffering from a physical impairment, whether as a result of injury, illness or age, or
 - d) has a physical disability which is of such a nature or degree—
 - i. as to restrict the capacity of the person to guard himself or herself against harm by another person, or
 - ii. that results in the person requiring assistance with the activities of daily living including dressing, eating, walking, washing and bathing.

2. SCOPE

This policy applies to SVP members, non-member volunteers, employees and others acting on behalf of SVP who carry out “relevant work” with children and /or vulnerable persons on a regular basis as defined in the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 – 2016.

Responsibility for ensuring this policy is effectively implemented rests with the national network of Conferences and Councils.

3. POLICY

SVP is committed to the protection and welfare of children and vulnerable persons. As part of this commitment SVP complies with relevant legislation and recommended best practice in recruitment and selection procedures for both employees and volunteers, and will conduct Garda Vetting, where appropriate, as part of this process.

4. GENERAL PRINCIPLES

- Any person who is carrying out work or activity, a necessary and regular part of which consists mainly of the person having access to, or contact with, children or vulnerable adults requires garda vetting. SVP will not permit any person to undertake relevant work or activities on behalf of the organisation unless a vetting disclosure is received from the National Vetting Bureau (NVB) in respect of that person and approved by SVP.
- All SVP roles with access to children or vulnerable persons will complete the Garda Vetting process prior to undertaking any activities for SVP.
- SVP Garda Vetting is valid for a maximum period of three years. After this time the Garda vetting is out of date. An application must be made for re-vetting before the expiry date.
- An applicant may be required to complete the vetting process again at any time or times within the three years. This allows SVP to re-vet within the three years if new information is received or a complaint is made about anyone around criminal convictions or pending prosecutions. This means SVP will then legally be in possession of this information by way of formal disclosure as opposed to the matter being deemed hearsay.
- Personal identity will be validated face to face and with documentation as required by NVB as part of the Garda Vetting process.
- Any disputes regarding disclosure information will be managed in accordance with guidance from NVB.
- All decisions regarding disclosure information will be made in a framework of natural justice.

- All information relating to the vetting process will be held in a manner consistent with best practice in confidentiality and data protection.

5. Risk Holder:

The risk holder for Garda Vetting compliance is the Trustees.

REFERENCES

Garda Vetting Procedure

GARDA VETTING PROCEDURE

Category	Safeguarding / Recruitment and Selection
Procedure Name	Garda Vetting
National Management Council Approval date:	October 2019
Reference	GV005 (Procedure)
Policy Web Page	www.svp\safe-guarding.ie

1. SCOPE

The following procedures, guidance and forms apply to the application of the Garda Vetting policy.

2. IDENTIFYING ROLES WHICH REQUIRE VETTING

Any person who is carrying out work or activity, a necessary and regular part of which consists mainly of the person having access to, or contact with, children or vulnerable adults requires vetting. SVP will not permit any person to undertake relevant work or activities unless a vetting disclosure is received from the National Vetting Bureau in respect of that person. A person who contravenes this section shall be guilty of an offence, either the person, relevant organisation or both may be prosecuted. In proceedings for an offence under Section 12 of the Act it shall be a defence for the accused person to show that the accused person neither knew, nor could reasonably be expected to know, that the work or activity to which the employment, contract, permission or placement referred to constituted relevant work or activities.

Therefore, roles which allow opportunity for an applicant to build a relationship of trust with a child or vulnerable person will always require Garda Vetting (see Appendix 4).

Member / volunteer roles which require Garda Vetting in SVP includes but is not limited to:

- Home visitation volunteer.
- Volunteer in any children services – holiday centres, early childhood care and education, youth clubs, breakfast clubs, summer programmes for children, childcare centres in prison setting, seafarers, etc.
- Volunteer in any services for vulnerable persons – resource centres, residential and day centres, holiday centres, social housing, homeless services.
- Volunteers carrying out the Designated Liaison Person role as per SVP Safeguarding Policy and Procedure.

- Volunteers in any areas of SVP activities where there is opportunity to create a relationship of trust with a child or vulnerable person including by means of electronic interactive communications.
- See SVP volunteer role recruitment and selection matrix.

Employee roles (including CE and TUS workers) which require Garda Vetting in SVP:

- Employees in any children services - holiday centres, early childhood care and education, youth clubs, breakfast clubs, summer programmes for children, youth development officers, childcare centres in prison setting, etc.
- Employees in any services for vulnerable persons – resource centres, day centres, holiday centres, social housing, homeless services.
- Employees who may have contact with, or access to sensitive personal information about children of vulnerable adults; e.g. Membership Support Office, Information Officer, Regional Co-ordinator, National Member Support Team, Regional and National Youth Development Team.
- Employees carrying out the Designated Liaison Person role as per SVP Safeguarding Policy and Procedure e.g. Regional Retail Manager, Regional Co-ordinator, Membership Support Officer, Information Officer etc.
- Employees in any areas of SVP activities where there is opportunity to create a relationship of trust with a child or vulnerable person including by means of electronic interactive communications.
- See SVP employee role recruitment and selection matrix.

This list is not exhaustive and any doubt regarding the requirement for vetting should be discussed with National Safeguarding Manager. Also see Appendix 4 for details of roles, and info on student placements.

3. PROCEDURE FOR VALIDATION OF IDENTITY

The identity of the applicant must be checked face to face against an original valid form of identification as specified on the Garda Vetting Invitation Form Section 3 (ID Validation section).

The person validating identity must tick the appropriate box for the form of ID that was used to verify the identity of the applicant. For potential members/volunteers the 100-point rule for ID validation must be observed (see 100-point ID checklist) - for example a driver's license (credit card type)

carries 80 points and therefore must be accompanied by an additional form of ID totalling 100 points e.g., utility bill.

For existing members renewing their Garda Vetting, a proof of address dated within the past 6 months (such as copy of utility bill or top of bank statement) and a photo ID (including name, photo, and date of birth such as a copy of passport or driver's license) must be presented for identity validation.

Identity may be validated by the following SVP roles:

- Conference President
- Area President
- Regional Co-ordinator
- Membership Support Officer
- Information Officer
- Other SVP Manager

Children under 18 may not have appropriate ID; therefore the 100-point rule is allocated differently – either a birth certificate, passport or written statement by a principal confirming attendance at educational institution on a letter head of that institution will satisfy.

The relevant person validating the applicant's identity completes the identity validation section and signs it, confirming that they have verified the identity of the applicant.

4. PROCEDURE FOR VETTING APPLICATIONS

1. The vetting applicant completes a Vetting Invitation (NVB1) form which includes the ID Validation section.
2. The vetting applicant then presents their original IDs to the relevant person for validation (see Section 3).
3. The form, along with copies of their IDs are then posted or emailed to the Garda Vetting Team for processing. These documents are kept in accordance with SVP data retention policy.
4. Before vetting can commence the applicant must have an active profile on the CRM.
5. SVP Liaison Person/Clerk User then inputs applicant's NVB1 to the NVB system where an email is generated inviting applicant to complete the online eVetting Application Form.
6. The vetting applicant completes an eVetting Application Form online and submits it to SVP.
7. The SVP Liaison Person reviews the Vetting Application Form online and submits it to the National Vetting Bureau for processing.

8. The National Vetting Bureau processes the application and releases a vetting disclosure to SVP Liaison Person.
9. SVP reviews the vetting disclosure and can provide a copy to the vetting subject on request. The vetting disclosure is also uploaded to the CRM, which is only accessible by the Garda Vetting Team.

For applicants who would prefer a paper-based application they can instead request an NVB2 form. This form eliminates the need to complete the application online. When completing an NVB2 form the process is the same as the NVB1 form, without the need for steps 6 or 7.

Applicants must provide their complete address history, failure to do so will render the disclosure null and void.

5. PROCEDURE FOR RE-VETTING

SVP Garda Vetting is valid for a maximum period of three years. After three years the vetting expires, and an application must be made to renew before the expiry date or sooner if requested by SVP.

Re-vetting applicants will follow the procedure in Section 4 to renew their vetting. It is the responsibility of the Liaison Person/Clerk User to identify and communicate with volunteers and employees who require re-vetting. This communication can be direct (one to one), via Conference President or Service Manager.

During this process up to date membership/employee information (e.g., role, status or associations) captured by Liaison Person /Clerk User will be referred back to Regional Office or Service Manager for any relevant action (see Appendix 7).

Non-Engaging Applicants

Applicants will be contacted by the Garda Vetting Team to support the applicant to renew their vetting:

1. Emailed/Posted the application for Garda Vetting.
2. First text/call reminder.
3. Second text/call reminder.
4. Letter to applicant with Conference President also receiving a copy.

The Garda Vetting Team will contact Conference Presidents as required with a list of conference members highlighting those whose vetting is out of date or coming up for renewal. Area Presidents will be sent a list of applicants with out-of-date vetting in their area at least twice per year.

In addition to the above, a list of applicants who have been through the above process but not engaged with it will be sent to the Regional President, Regional Co-Ordinator, and Membership Support Officer every 2 months so re-vetting can be included on the agenda at Regional Council.

Regional Councils are responsible for reviewing this list and acting accordingly.

6. VETTING UNDER 18s

SVP employees and volunteers aged between 16-18 years old who have contact with children and vulnerable adults on a regular basis will also be required to complete the vetting process. To apply for vetting there must be a completed parental consent form (NVB3). This form is available from the SVP website. Vetting cannot be conducted for a person under the age of 16 years.

7. PROCEDURE FOR HANDLING DISPUTES

In instances where a vetting subject disputes any detail contained on a Garda Vetting Disclosure, issued to the Liaison Person in respect of the applicant, the following procedure will apply:

1. The Vetting Subject should outline the exact basis of his/her dispute and submit it in writing to the Liaison Person in National Office.
2. The Liaison Person will submit the applicant's submission in writing, with the original vetting form to the National Vetting Bureau for review.
3. If, following further checks, the applicant still disputes details of the disclosure, arrangements will be made for further validation procedures.
4. At the conclusion of the dispute resolution process, decisions on the suitability of the applicant will be the responsibility of the Decision-Making Committee.

8. PROCEDURE FOR DECISION-MAKING REGARDING DISCLOSURES

SVP will apply the principles of natural justice in dealing with any disclosures of convictions.

Upon receipt of such a disclosure the Liaison Person:

1. Take account if Garda Vetting application (self disclosure) form was correctly completed.
2. Contacts the applicant directly to inform them of the disclosure.
3. A copy of the disclosure is then sent to the applicant to review and confirm if correct.
4. If not correct, the Liaison Person will contact the NVB to dispute the disclosure (see section 7).
5. Once the contents of the disclosure are confirmed as correct with the applicant, the disclosure is then sent to the National Safeguarding Manager to review.
6. Depending on the nature of the offence the National Safeguarding Manager can then approve the disclosure at this stage for minor offences, arrange to review with the applicant or refer it to the Decision-Making Committee.

7. The National Safeguarding Manager and Liaison Person may hold a joint meeting with the applicant to discuss the disclosure.
8. Disclosures containing a serious offence or multiple minor offences will be reviewed by the Decision-Making Committee. This Committee is comprised of five members, 1) National President, 2) National Secretary, 3) relevant Regional President and/or relevant Service Manager, 4) National Safeguarding Manager and 5) independent Regional President and/or Service Manager with the Liaison Person presenting the facts on the disclosure.
9. A minimum of four must be present for any meeting (See Appendix 5). The Chairperson is the National Secretary.
10. In some cases, an application could be reviewed by the Decision-Making Committee via email.

9. RISK ASSESSMENT OF DISCLOSURES

A conviction, prosecution or case pending will not necessarily bar an applicant for consideration for engagement. The following criteria will be considered;

- The nature and number of any convictions;
- The frequency of any convictions;
- The post for which the person is seeking engagement;
- The self disclosure of the conviction/case pending by the applicant; and
- The time lapse since the conviction.

The Society of Saint Vincent de Paul considers the following non-exhaustive list to be reasonable grounds to refuse an individual access to or contact with children, young people or vulnerable adults:

- The individual has been charged with, or has a conviction for, a sexual offence.
- The individual has been charged with, or has a conviction for, serious harm to others including an offence that related to the ill treatment or neglect of children or vulnerable adults.
- The individual has been charged with, or has a conviction for, the ownership, production, possession or distribution of images of child abuse and exploitation.

Pending Court Cases

As a rule, Garda Vetting application disclosures with pending court cases are rejected, though the applicant is advised they can apply for a new Garda Vetting disclosure upon completion of the Court proceedings. The National Safeguarding Manager and Liaison Person can, on a case-by-case basis, refer the disclosure to the Decision-Making Committee for review and decision.

Spent Convictions

Certain criminal offences of a minor nature are treated as 'spent' after seven years, in the Republic of Ireland under the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016. This is not the current practice in some jurisdictions in particular in Northern Ireland and Great Britain, meaning historical offences from other jurisdictions will to be reported to SVP in the Garda Vetting disclosure.

The Liaison Person will confirm with the applicant that the disclosure is complete and correct. In these circumstances where an offence is disclosed by the NVB from another Jurisdiction and would be classified as 'spent' in ROI, then the offence will be treated as 'spent'.

10. PROCEDURE FOR REFUSAL BASED ON DISCLOSURE HISTORY

Following the decision from the Decision-Making Committee not to proceed with application based on disclosure history the applicant will be contacted by the Liaison Person and advised of the decision by phone. This will be followed up in writing also.

The Liaison Person will update CRM and inform Regional Contact Person that the applicant has been refused based on Garda vetting.

11. SUPERVISION AND SUPPORT OF EX OFENDERS

Occasionally disclosure information about an applicant may be released to SVP by the NVB which would not preclude the applicant from working with children or vulnerable adults but may warrant supervision and support for the applicant from a line manager or equivalent. Depending on the nature of the offence, the National Safeguarding Manager may share some brief information regarding the disclosure with the applicant's potential line manager. This information is only shared with the applicant's permission. The information sharing is for the purpose of support and supervision only.

The line manager will meet with the applicant and the National Safeguarding Manager during the induction process to discuss the disclosure. The applicant will be reminded that the line manager is there to talk and offer relevant support and agree a supervision plan with specified review timelines

should the applicant have any concerns or issues that may affect them in the carrying out of their responsibilities with SVP. Due to the initial risk assessment of the disclosure of offences by SVP, resulting in the applicant being permitted to commence employment, SVP will be assured that there is a good chance that the applicant has put their offending behaviour behind them and is prepared to embark on a career with SVP.

Any applicant (with or without previous convictions) may be required to be re-vetted at a future date as per re-vetting procedures within the remit of this Garda Vetting Policy.

12. DATA PROTECTION

SVP complies fully with good practice regarding the secure storage, handling and use of the Vetting Bureau disclosures and personal vetting information as per Data Protection Policy and legal obligations under Data Protection Legislation (incl. GDPR).

13. INTER AGENCY INFORMATION SHARING AGREEMENTS

On a case by case basis it will be possible to facilitate Garda Vetting information sharing agreements with other agencies / organisations in line with Section 12(3A) National Vetting Bureau (Children & Vulnerable Persons) Acts 2012 to 2016 which states that in situations where there is a shared obligation between two or more relevant organisations to vet an individual, the obligation to vet is satisfied where one party vets the individual and notifies the other relevant organisation of compliance. In order to share this information, there must be a joint written agreement in place between the relevant organisations as stated in Section 12(3A).

Inter-agency Garda Vetting information sharing arrangements in SVP can only be facilitated via the SVP Liaison Person in National Office. The Service Manager, Youth Development Officer, Membership Support Officer with responsibility for recruitment and selection should contact the Liaison Person at National Office for advice and guidance on a case-by-case basis.

APPENDIX 1 ROLE OF LIAISON PERSON

The Liaison Person(s) (based in National Office) will be nominated as per Section 12 of the National Vetting Bureau (Children and Vulnerable Person) 2012 Act.

Role of Liaison Person:

- The Liaison Person is legally defined, and after completing training is granted a licence by the NVB
- Only point of contact between SVP and National Vetting Bureau.
- Process Garda Vetting applications in line with National Vetting Bureau (Children and Vulnerable Persons) Act 2012 and 2016.
- Liaises with applicants directly to renew their Garda Vetting on a 3-year cycle.
- Liaises with employees, CE and Tús workers and Service Managers to ensure Garda Vetting is up to date where applicable, and appropriately shared through a *Shared Agreement* with external agencies, as required.
- Escalates the issue of applicants not engaging with the Garda Vetting process to Conference President, Area President and Regional President.
- Reviews all applications before they are submitted to the National Vetting Bureau for processing.
- Co-ordinates the review of Garda Vetting Disclosures with a criminal record reported, contacting the applicant directly before arranging a meeting between the applicant, Liaison Person and National Safeguarding Manager.
- Organises the meeting of the Decision Making Committee, which includes the Liaison Person, to review disclosures of more serious offences.
- Supervises the work of the Clerk User role.

APPENDIX 2 ROLE OF CLERK USER

Clerk User is a role created by the NVB to assist and support the Liaison Person role. The Clerk User is supervised by the Liaison Person(s).

APPENDIX 3 ROLE OF GARDA VETTING CONTACT PERSON

A list of trained Garda Vetting Contact Persons will be held at National Office. Each Region may nominate up to 4 Regional Contact Persons.

Role of the Garda Vetting Contact Person:

- Be the contact point at Regional/National/Service level with Liaison Person in National Office;
- Be a source of information for Conferences and services in the Region in relation to Garda Vetting queries and concerns;
- Ensure applicant details on CRM;
- Input applicant Garda Vetting details to CRM;
- Final check on Garda Vetting Invitation Form;
- Be available to Liaison Person if further information required regarding applicants, their details, or specific roles applied for, etc.

APPENDIX 4 ROLE SPECIFIC VETTING

The Recruitment Matrix for Employees and Volunteers documents can be used in the decision to carry out Garda Vetting for roles.

Examples of employee roles which will require Garda Vetting

- Regional Co-ordinator, Membership Support Officer, Information Officer roles incorporating Designated Liaison Person as per SVP Safeguarding Policies and Procedures, roles conducting relevant work and therefore where there is regular contact with children or vulnerable persons.

Examples of employee roles which will NOT require Garda Vetting (no contact with children or vulnerable adults)

- Retail roles shops, warehouses, depots, OFC's.
- Administrative roles where there is no regular contact with children or vulnerable adults.

Second level student placements and Garda Vetting

There is no requirement for second level students (secondary school) on placement with SVP to undergo Garda Vetting unless they will be placed in a service where there is regular contact with children or vulnerable adults e.g. children's services, etc.

Services who are facilitating second level student level placements e.g. shops, SVP offices are not required to apply Garda Vetting to all other staff and volunteers.

All other best practice in child welfare and safety will apply and a 'Second Level School Student Placement Agreement' must be completed with the organisation placing the student.

Third level student placements and Garda Vetting

See section 13 of this policy document.

Where there is a shared obligation between agencies to Garda Vet an individual attending for a third level student practice / observation placement (therefore for the educational institute and the service facilitating the placement) it is adequate for one agency to conduct Garda Vetting and provide the other agency with evidence that Garda Vetting has occurred – this happens via the information sharing agreement outlined in section 13 of this policy document.

APPENDIX 5 DISCLOSURES

A Garda Vetting disclosure is issued to SVP for every completed Garda Vetting application with the National Vetting Bureau. The Disclosure will state 'Nil' under the Criminal Record section if there is nothing to report. For vetting applicants with a criminal history, under Criminal Record the following information will be included:

- Court Date
- Court
- Offence
- Result

Specified Information can also be included on the Garda Vetting disclosure. This means information concerning a finding or allegation of harm to another person received by the Bureau from An Garda Síochána or a scheduled organisation pursuant to section 19 of the Act. It is information that is considered to give rise to a bona fide concern that the vetting subject may harm, attempt to harm or put at risk a child or vulnerable person or both. If such information is going to be disclosed to a relevant organisation relating to one of their applicants, the Chief Bureau Officer must, in advance, notify the vetting subject of the intention to disclose the information.

On completion of the application the Liaison Person will download the disclosure, saving it to the secure Garda Vetting server. The disclosure is also uploaded to the CRM, and the date the vetting is completed is updated.

Vetting Disclosure Decision-Making Committee Meeting	
Venue:	
Apologies:	
Chair – National Secretary	
Notetaker:	
<p><u>Agenda:</u></p> <ol style="list-style-type: none"> 1. Introduction by chairperson. 2. Discussion with clarification on report / interview with applicant. 3. Risk holder confirmed. 4. Safeguarding Considerations. 5. Decision: Consensus on approval or rejection. 6. Outcome – agreed actions; eg supervision plan, oversight timebound plan. 7. Next steps – Action. 	
Summary Notes:	

APPENDIX 6 SABBATICAL PROCEDURE

Any person, previously Garda Vetted by the Society, but who for whatever reason may have ceased their activity or work with children and or vulnerable persons in the Society for a period of more than six months, shall be required to complete Garda Vetting prior to commencing or re-commencing any activity or work with children and or vulnerable persons in a role where they are carrying out relevant work (see Section 4).

The person's Garda Vetting must be approved by SVP Liaison Person before they return to their role in SVP.

APPENDIX 7 DELAYED RE-VETTING APPLICATION

- It has been 1 month since the application was submitted to the National Vetting Bureau:
 - 1) Liaison Person contacts the NVB to enquire what the delay could be.
- It has been 2 months since the application was submitted to the National Vetting Bureau:
 - 1) Liaison Person contacts the individual by phone to explain that there is a delay with the completion of their vetting and the Conference President / service or line manager will also be informed.
 - 2) Liaison Person contacts the Conference President / service or line manager by phone to explain that there is a delay with completion of Garda Vetting.
 - 3) Liaison Person notifies the Conference President / service or line manager of the delay by letter. The applicant must then either be placed under a supervision plan with agreed review timelines or step back from all duties until their re-vetting is completed and approved.
 - 4) Notify National Safeguarding Office of delays.