ICPHAA

Irish Counselling, Psychotherapy & Allied Healthcare Professionals Association

MEMBERS' PROFESSIONAL PRACTICE

Garda Vetting Policy

Which ICPHAA members must hold current Garda vetting, how vetting is obtained and evidenced, how disclosures are assessed fairly, and what members must tell the Association.

REFERENCE	ICPHAA-POL-08	VERSION	1.0
EFFECTIVE	9 November 2026	NEXT REVIEW	9 November 2027
POLICY OWNER	ICPHAA Board of Directors		

Garda Vetting Policy

APPLIES TO	All ICPHAA members and applicants whose work involves children or vulnerable persons, and any member ICPHAA asks to provide vetting.
VERSION	1.0 · effective 9 November 2026 · next review 9 November 2027
POLICY OWNER	ICPHAA Board of Directors
CONTACT	ICPHAA Registry · admin@icphaa.ie

AT A GLANCE

- Members whose work involves children or vulnerable persons must hold current, satisfactory Garda vetting for that work.
- Vetting is obtained through an organisation registered with the National Vetting Bureau; members then give ICPHAA evidence of it.
- Disclosures are assessed individually and fairly, and members can make representations before any adverse decision.
- Members must tell ICPHAA at once about any conviction, prosecution or investigation relevant to their suitability.
- Vetting is renewed at the interval set in the ICPHAA accreditation requirements, and lapsed vetting means stopping the relevant work.

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1. Purpose

ICPHAA is committed to the protection of children, young people and vulnerable adults. Garda vetting is one of the most important safeguards in that commitment. Counselling, psychotherapy and allied health-care typically involve private, one-to-one and emotionally sensitive contact with people who may be at a vulnerable point in their lives.

This policy sets clear and consistent requirements for Garda vetting across ICPHAA membership categories. It explains which members must be vetted, how vetting is obtained and evidenced, how vetting disclosures are assessed, and what members must do to stay compliant. ICPHAA aims to operate a vetting policy that is rigorous, fair and proportionate, protecting the public while respecting the rights of practitioners.

2. Legal framework and definitions

Garda vetting in Ireland is governed by the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012–2016. Under these Acts, the National Vetting Bureau of An Garda Síochána checks its records and provides a vetting disclosure, which may include criminal convictions, prosecutions pending and, in limited circumstances, other specified information.

The Acts require vetting for people who carry out *relevant work or activities*, which include work or activities that consist of treatment, therapy or counselling services provided to children or to vulnerable persons, as well as other work giving access to them.

- **Child** means a person under the age of 18 years.
- **Vulnerable person** broadly means an adult who has a mental illness or dementia, an intellectual disability, or a physical impairment or disability, which restricts their capacity to guard themselves against harm or means that they need assistance with the activities of daily living.

This policy also sits alongside the Children First Act 2015, the Data Protection Acts 1988–2018 and the General Data Protection Regulation (GDPR), and the ICPHAA Code of Conduct for Members.

3. Who must be vetted

Garda vetting is a condition of ICPHAA membership for any member or applicant who:

- works directly with clients under the age of 18;
- works with adults who are vulnerable persons, including adults whose capacity to protect their own interests is significantly limited by mental illness, intellectual disability, physical disability or age-related impairment;
- works in settings such as residential care, inpatient mental health services or educational institutions, where they have regular, unsupervised access to children or vulnerable persons;
- supervises or trains practitioners who are working directly with children or vulnerable persons.

Members who work only with adults who are not vulnerable persons, in private practice, are not required to hold Garda vetting as a condition of ICPHAA membership. ICPHAA strongly encourages them to hold current vetting where they can, as a mark of professional good standing and of their commitment to safeguarding.

> **STUDENT MEMBERS**
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> Students are normally vetted through their training programme or placement provider before they begin client work. They should provide ICPHAA with evidence of that vetting where their placement involves children or vulnerable persons.

ICPHAA may require vetting from any member where it considers this necessary to protect the public, for example in connection with a complaint or a change in the member's practice.

4. Obtaining vetting and evidencing it

Individuals cannot apply to the National Vetting Bureau on their own behalf. Vetting is carried out through an organisation that is registered with the Bureau, such as an employer, a placement provider, a training organisation or another registered body for which the member carries out relevant work.

1. Identify the registered organisation through which your vetting will be carried out. Members who are unsure how to obtain vetting for their practice should contact the ICPHAA Registry for guidance.
2. Complete the registered organisation's identity validation process and the National Vetting Bureau application, giving your consent as required.
3. When the vetting disclosure is issued, obtain written confirmation of it from the registered organisation, or a copy of the disclosure where the organisation provides one.
4. Send evidence to the ICPHAA Registry at application and at renewal, showing the date of the disclosure, the organisation through which it was obtained and the type of work it relates to.
5. Keep your own copy of the evidence securely.

Members who have lived outside Ireland for a significant period may also be asked to provide a police certificate, or its equivalent, from the relevant country, as Garda vetting covers only records held in the State.

Vetting evidence must relate to work of the same kind as the member's current practice. Where a member changes the nature of their work, for example by beginning to work with children, they must make sure that their vetting covers the new work before they start.

5. Assessment of disclosures

Where a vetting disclosure contains convictions, prosecutions pending or other relevant information, ICPHAA carries out a careful, individual assessment before making any decision about membership or suitability for work with children or vulnerable persons. Not every disclosure will make a person unsuitable, and each case is considered on its facts.

In making its assessment, ICPHAA has regard to:

- the nature and seriousness of the offence or information;
- when it occurred and how much time has passed;

- the person's age and circumstances at the time;
- its relevance to work as a counsellor, psychotherapist or allied healthcare practitioner;
- any evidence of rehabilitation, insight or changed circumstances;
- how open the person has been in disclosing the information;
- the client group with which the person works or intends to work;
- any expert or legal advice obtained by ICPHAA.

Disclosures involving offences against children or vulnerable persons, violence, sexual offences, or dishonesty or abuse of a position of trust are treated with particular seriousness and are likely to lead to an adverse decision. Even so, every assessment is individual, and the member or applicant is given a full and fair opportunity to make representations before any adverse decision is made. ICPHAA may seek independent legal advice where complex questions of law or fairness arise.

6. Duty to notify and renewal

Duty to notify

Members must tell the ICPHAA Registry immediately if, at any time during their membership:

- they are convicted of a criminal offence or charged with one;
- they become the subject of a Garda investigation into matters that may affect their suitability to work with children or vulnerable persons;
- any other information comes to light that may affect their vetting status or their fitness to practise.

Failure to notify ICPHAA of such information is a serious breach of professional conduct.

Renewal

Garda vetting is not a once-and-for-all requirement. Members who are required to hold vetting must renew it at the interval set in the ICPHAA accreditation requirements, or sooner where an employer, the National Vetting Bureau or the law requires it, or where a change in the member's circumstances makes earlier renewal appropriate. Members are personally responsible for keeping their vetting current and for providing evidence at renewal.

A member whose vetting lapses must tell the ICPHAA Registry immediately and must not carry out relevant work with children or vulnerable persons until current vetting is in place.

7. Confidentiality of vetting information

Vetting information is highly sensitive. ICPHAA handles it in strict confidence and in line with the Data Protection Acts 1988–2018, the GDPR and the Association's Legal & Data Governance Policy.

- ICPHAA records only the information it needs: normally the date of the disclosure, the organisation through which it was obtained, the type of work it covers and whether it raised any matter requiring assessment.

- Where a disclosure contains information that must be assessed, access to it is limited to those directly involved in the assessment.
- Vetting information is used only for assessing membership eligibility and suitability, and is not shared with third parties except where the law requires it.
- Vetting records are kept securely, separately from general membership information, and only for as long as necessary.

8. Children First and safeguarding

Garda vetting is one part of a wider safeguarding framework. Members who work with children must also comply with the Children First Act 2015. Counsellors and psychotherapists registered with a voluntary professional body are mandated persons under the Act and must report reasonable concerns about the abuse or neglect of a child to Tusla, the Child and Family Agency.

Members working with children must complete Children First training, be familiar with Children First National Guidance, and provide evidence of training to ICPHAA at application and renewal. ICPHAA supports members in fulfilling their reporting obligations: a report made honestly and in good faith will not lead to any adverse action by the Association. The Safeguarding & Duty of Care Policy gives further detail.

9. Responsibilities and breaches

Members are responsible for obtaining and renewing vetting where this policy requires it, for providing evidence, for notifying ICPHAA of any relevant change, and for not carrying out relevant work without current vetting.

ICPHAA is responsible for checking vetting evidence at application and renewal, for keeping an accurate and confidential record of members' vetting status, for reminding members in good time when renewal is due, for assessing disclosures fairly, and for keeping this policy under review.

Failure to hold current vetting where it is required, failure to notify ICPHAA of a lapse or of relevant information, or providing false information about vetting may lead to conditions on practice, suspension or termination of membership under the Fitness to Practise Policy or Disciplinary Procedures. Where it is necessary to protect the public, ICPHAA may take interim steps while a matter is considered. Questions can be sent to the ICPHAA Registry at admin@icphaa.ie.

10. Monitoring and review

The ICPHAA Board of Directors owns this policy and reviews it at least annually, or sooner where changes in vetting law, safeguarding guidance or professional practice require it. Vetting compliance is checked at each membership renewal. The current version is available at www.icphaa.ie.

READ ALONGSIDE

- Safeguarding & Duty of Care Policy
- ICPHAA Code of Conduct for Members
- Public Protection Policy
- Legal & Data Governance Policy
- Fitness to Practise Policy
- Disciplinary Procedures

DOCUMENT CONTROL

VERSION	DATE	CHANGE	APPROVED BY
1.0	9 November 2026	Reissued in the ICPHAA policy framework (replaces the former ICPA version).	ICPHAA Board of Directors

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