



# Digital Hub Development Agency

## Child Protection Policy and Code of Behaviour for working with Children and Young People

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## INTRODUCTION

Digital Hub Development Agency (DHDA) has written this policy to ensure the safety of all children and young people that we engage with in our on campus learning programs. It has been developed in line with the requirements of the Children First Act 2015 and the updated Children First: National Guidance for the Protection and Welfare of Children (2017), as issued by the Department of Children, Equality, Disability, Integration and Youth.

Adopting the following principles in DHDA will help to promote and facilitate the full participation of children and young people in the programs we facilitate and deliver. We aim to create a safe and healthy environment for children and young person we work with and are committed at all times to ensuring their safety and welfare.

The guiding principles are:

- Treat children and young people with care, dignity and respect
- Recognise that those working for and with DHDA in the delivery of our Learning Initiatives will be perceived by children and young people as trusted persons
- All children and young people, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from harm or abuse
- Ensure that communication with children and young people and their parents is unambiguous
- Adopt the safest possible practices to minimise the possibility of harm or accidents happening to children and young people and protect workers from the necessity to take risks and leave themselves open to accusations of abuse
- Adopt and consistently apply clearly defined methods of recruitment
- Develop procedures for responding to complaints
- Provide child protection training for relevant workers. This should clarify the responsibilities of both organisations and individuals, and clearly show the procedures to be followed

This policy establishes the responsibilities of all who work for and with DHDA including contractors with regard to the protection of children and young people when working with or when in contact with them and will be brought to their attention during their induction programme to the organisation.

Given the nature of the programs that we deliver and the interaction which takes place with various people such as staff, members of our campus, contractors, freelancers, independent companies and visitors, these guidelines will apply to all concerned. While it is not possible to legislate for every eventuality in this policy, DHDA staff and contractors should be aware that the spirit of the policy as set out in the Child Protection Policy Statement as well as the wording of the detailed processes and procedures should be observed at all times. For the avoidance of doubt where a Third-Party Service Provider is contracted to deliver learning programs or initiatives to children and young people on The Digital Hub campus or on behalf of The Digital Hub it must demonstrate that it has adopted all of the policies in this document.

## POLICY STATEMENT

DHDA is committed to a child-centred approach to our work with children and young people. It is central to the philosophy of DHDA that children and young people are unconditionally respected and kept safe from harm while in our care. It is important to ensure that normal practices and behaviour within our organisation actively promote the delivery of a safe engaging environment, where the welfare of the child/young person is paramount. This Policy and guidelines assist DHDA in adhering to the principles as set out in the "Children First National Guidance for the Protection and Welfare of Children 2011", as issued by the Department of Children and Youth Affairs.

DHDA undertakes to:

- Treat children and young people with care, respect and dignity.
- Place the welfare of the child or young person at the heart of the DHDA learning experience.
- Recognise that those working in DHDA will be perceived by children and young people as trusted persons and therefore all staff, contractors and guests must comply with this policy.
- Ensure communication with children and young people is open and clear.
- Assess the risks posed to children and young people when undertaking activities. This process should form part of the overall programme risk assessment.
- We recognise that all children and young people, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from harm or abuse.
- Give children and young people the right to be heard, listened to and taken seriously.
- Respond to any concern/report/disclosures in an appropriate manner in order to ensure the Safety, Health and Welfare of children and young people involved in all DHDA learning activities.
- Ensure best practice in the recruitment of staff or contractors, which includes good HR practices in interviewing, induction training, probation, taking up of references, National Vetting Bureau clearance (where required under the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012–2016, and ongoing supervision and management.
- Ensure all staff in DHDA including contractors understand their responsibility to promote the protection of children and young people and to comply with this policy.
- Ensure that a comprehensive Child Safeguarding Statement compliant with Children First Act 2015, Section 11, is prepared, published and regularly reviewed, and that all staff, contractors and service providers are made aware of it.
- Review this policy at least every two years based on DHDA's experience of its operation and in light of any legislative changes which arise in the area of Child Protection.

Employees are always expected to maintain a sense of proportion, apply common sense to situations and protect the child's welfare as a priority.

## PRINCIPLES FOR BEST PRACTICE IN CHILD PROTECTION

**Children First:** National Guidance for the Protection and Welfare of Children, National Guidelines are complemented by the publication of Our Duty to Care: The Principles of Good Practice for the Protection of Children and Young People (Department of Health and Children, 2002). The 2002 publication is a practical guide for staff and volunteers who work with children and young people, outlining fundamental principles of good practice.

DHDA adopts the following principles outlined in Our Duty to Care, ensuring the creation of an environment in which young people are listened to, given a sense of belonging and kept safe. Creating an environment where parents are supported and encouraged and staff and contractors who work with young people are supported and protected.

The following are the key principles for best practice in Child Protection:

- Acknowledge the rights of children and young people to be protected, treated with respect, listened to and have their own views taken into consideration.
- Recognise that the welfare of children and young people must always come first, regardless of all other considerations.
- Develop a Child Protection Policy that raises awareness about the possibility of Child Abuse occurring and outlines the steps to be taken if abuse is suspected.
- Adopt the safest possible practices to minimise the possibility of harm or accidents happening to children and young people and protect workers from the necessity to take risks and leave themselves open to accusations of abuse or neglect.
- Adopt and consistently apply clearly defined methods of recruiting staff and contractors.
- Remember that early intervention with children and young people who are vulnerable or at risk may prevent serious harm from happening to them at a later stage.
- Remember that a child and young person's age, gender and background affect the way they experience and understand what is happening to them.
- Provide Child Protection training/briefings for staff and contractors. This should clarify the responsibilities of both organisations and individuals and clearly show the procedures to be followed if Child Abuse is suspected.
- Develop a policy of openness with parents/guardians that involves consulting them about everything that concerns their children and young people.
- Make links with other relevant organisations in order to promote Child Protection and welfare policies and procedures.

It is the ethos of DHDA that by valuing both children & young people and staff/contractors and creating a safe working and learning environment, will make for a more rewarding and welcoming atmosphere.

## THE RIGHTS OF THE CHILD

For the purpose of this policy "a child" means a person under the age of 18 years, who is or has not been married.

Ireland ratified the UN Convention on the Rights of the Child in 1992. The Convention is in essence a "bill of rights" for all children and young people. It contains rights relating to every aspect of children's and young people's lives including the right to survival, development, protection and participation. The underlying principles of the Convention may be summarised as follows:

- **Non-Discrimination (Art. 2):**

All rights apply to all children and young people without exception. The state is obliged to protect children and young people from any form of discrimination and to take action to promote their rights.

- **Best Interests of the Child (Art. 3):**

All actions concerning the child shall take account of his or her best interests. The state shall provide the child with adequate care when parents or others charged with that responsibility fail to do so.

- **Survival and Development (Art. 6):**

Every child has the inherent right to life and the state has an obligation to ensure the child's survival and development.

- **The Child's Opinion (Art. 12):**

The child has the right to express his or her opinion freely and to have that opinion taken into account in any matter or procedure affecting the child.

A number of articles of the Convention are of particular relevance to Child Protection:

- Article 19 states that parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, while in the care of parent(s), legal guardian(s) or any other person who has care of the child.
- Articles 34 and 35 refer respectively to the protection of children and young people from sexual exploitation and from sale, trafficking and abduction.

## KEY LEGISLATIVE PROVISIONS

The following are the key legislative provisions governing the rights of children and young people and their protection and the protection of those reporting Child Abuse concerns:

### **Child Care Act, 1991 (as amended)**

The purpose of the act is to “up-date the law in relation to the care of children and young people who have been assaulted, ill-treated, neglected or sexually abused or who are at risk”.

The main provisions of the act are:

- The placing of a statutory duty on the Tusla – Child and Family Agency to promote the welfare of children and young people who are not receiving adequate care and protection up to the age of 18 (Sec. 3.1).
- The strengthening of the powers of the Tusla to provide childcare and family support services.
- The improvement of the procedures to facilitate immediate intervention by Tusla and An Garda Síochana where children and young people are in danger.
- The revision of provisions to enable the courts to place children and young people, who have been assaulted, ill-treated, neglected or sexually abused or who are at risk, in the care of or under the supervision of Tusla.
- The introduction of arrangements for the supervision and inspection of pre-school services.
- The revision of provisions in relation to the registration and inspection of residential centres for children and young people.

### **Protection for Persons Reporting Child Abuse Act, 1998**

This act came into operation on the 23<sup>rd</sup> January 1999.

The main provisions of the act are:

- The provision of immunity from civil liability to any person who reports Child Abuse “reasonably and in good faith” to designated officers of HSE or any member of An Garda Síochana.
- The provision of significant protections for employees who report Child Abuse. These protections cover all employees and all forms of discrimination up to, and including, dismissal.
- The creation of a new offence of false reporting of Child Abuse where a person makes a report of Child Abuse to the appropriate authorities “knowing that statement to be false”. This is a new criminal offence designed to protect innocent persons from malicious reports.

### **Children First Act 2015**

The Children First Act 2015 provides the statutory framework for child protection in Ireland.

Key provisions include:

- **Mandatory Reporting:** Persons working with children in designated services (including educational and youth programmes) must report to Tusla any information or reasonable belief that a child has been abused or is at risk of abuse, without delay. Failure to report is a criminal offence.

- **Child Safeguarding Statement:** Any organisation providing services to children must prepare and publish a Child Safeguarding Statement (Section 11) setting out how the organisation manages safeguarding risks and promotes children’s safety.
- **Tusla’s role:** Tusla is the statutory body responsible for child protection investigations and support.
- **Protection for reporters:** The Act provides protection to those who report in good faith.

### **Data Protection Act 2018 and General Data Protection Regulation (GDPR)**

The Data Protection Act 2018 and the General Data Protection Regulation (GDPR) govern how personal data relating to children and young people must be handled.

Key principles include:

- **Lawfulness, fairness and transparency** – personal data must be processed lawfully and transparently
- **Purpose limitation** – data collected for child protection purposes must not be used for other purposes without consent
- **Data minimisation** – only necessary personal data should be collected and retained
- **Storage limitation** – personal data should be retained only as long as necessary (see retention schedule in Section on Record Keeping)
- **Integrity and confidentiality** – data must be kept secure and protected from unauthorised access
- **Accountability** – the organisation must demonstrate compliance

All staff and contractors must ensure compliance with these principles when handling information about children and young people and must be aware of data subject rights (access, rectification, erasure where applicable to child protection records).

### **Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012**

This Act creates a criminal offence for failing to disclose information about certain offences against children and vulnerable persons to An Garda Síochána, where a person knows or believes such an offence has been committed. This applies to serious offences and takes precedence over confidentiality in certain circumstances.

### **Additional legislative provisions:**

- Health and Safety at Work Regulations 2007
- Freedom of Information Act, 2014
- Domestic Violence Act, 2018
- Non-Fatal Offences Against The Person Act, 1997
- Data Protection Act 2018 and General Data Protection Regulation (GDPR)
- Garda Síochána (Vetting) Act 2012 and National Vetting Bureau (Children and Vulnerable Persons) Acts 2012–2016

## RECRUITMENT, VETTING & SELECTION PROCESS

Safe practice starts with safe recruitment procedures and involves:

- Always applying thorough selection procedures
- Judging the suitability of applicants in relation to a broad range of matters
- Taking all reasonable steps to eliminate people who are not suitable for working with children and young people
- Providing training

This recruitment procedure will apply to all those hired specifically for the delivery of DHDA initiatives and/or working with children and young people, whether they are employed by DHDA, contracted by DHDA, engaged as volunteers, interns, work-experience students, or participating in any capacity that may involve unsupervised contact with children.

Implementation of Procedures

### **a) Role Clarification**

Identify the role of the new employee and the skills that will be required for them to carry out their duties.

### **b) Application Form**

All applicants wishing to apply for staff positions should apply on a standard application form. Contractors complete the application form. A clear job/role description along with a profile of the DHDA will be provided at this stage.

### **c) Declaration of Suitability**

All applicants will be required to sign a declaration stating that there is no reason why they would be unsuitable to work with young people. The Declaration of Suitability is included in both the Staff application forms. National Vetting Bureau clearance is sought for all staff and contractors and volunteers who will be working with children and young people.

### **d) Interview**

Applicants will be interviewed by at least two representatives of DHDA or 3<sup>rd</sup> party services provider. Their previous experience, with particular reference to their working and contact with children and young people will be focused on. Reference to the Child Protection policy and procedures will be emphasised.

### **e) References**

The applicant will be obliged to supply the name of two referees (non-relatives) who are willing to supply DHDA with references on their behalf. All references will be received in writing and confirmed by telephone and all details will be recorded. Any additional information will be attached to the application form.

### **f) Identification**

All applicants will be asked to present some identification e.g. passport, driving licence, ID card, which gives his/her full name, address, signature and photo, to confirm their identity.

### **g) Probationary Period**

Confirmation of all appointments will be subject to satisfactory completion of a period of probation, which will be specified in the contract. During the probationary period, DHDA will ensure that each employee is fully assisted in understanding and becoming familiar with the demands of their post and that there is full discussion with the employee about their progress and any concerns or issues which may have arisen. During the probationary

period, the employee will be advised on their progress in accordance with the individual contract of employment.

The period of probation may be extended for a special period if the organisation is not fully satisfied that the employee is suitable for the post. The employee will be informed through supervision and in writing about the reason(s) for this decision.

DHDA will apply the above procedures consistently with paid and unpaid staff, part-time and full-time workers.

The Child Protection training standard of DHDA is the NYCI Child Protection Awareness Programme. DHDA has committed to having all staff and contractors engaged by DHDA or our service providers trained and kept up to date at this level. Further training is available for Designated Persons. Training also consists of staff meetings and briefings and cascade of information.

## **SUPERVISION & TRAINING**

Teaching and working with children and young people is both worthwhile and fulfilling, but also challenging. Once recruited, all staff and contractors of DHDA will be well informed, trained, supervised and supported, so that they are less likely to become involved in actions which can lead to harm, or can be misunderstood.

The following processes will apply:

### **Induction**

All applicants will go through an initial induction period, which will enable them to get to know the organisation, the staff/contractors, their role and responsibilities. Contracts of employment, where applicable, will be discussed and signed. The induction period will also cover expectations, conditions and procedures for dealing with discipline, grievances and allegations and the Child Protection policy and procedures.

### **Supervision and Support Policy**

Staff and contractors participate in support and supervision sessions with their line manager on a regular basis. Interim sessions can be arranged should the need arise and there is access to email/telephone support as needed. Team/area support meetings are also held on a regular basis throughout the organisation. The support and supervision sessions ensure that DHDA personnel are supported in their work.

Sessions include regular reviews of performance/activity with personnel in order to:

- Ensure that the requirements of the role are fulfilled
- Give / receive feedback on person / work performance
- Identify any additional training and development needs
- Plan objectives for the weeks / months / years ahead

Support and supervision provides personnel with the opportunity to discuss their work in a structured and supportive environment. It is a process for encouraging and enabling personal development through dialogue. Support and supervision also involves monitoring and directing work undertaken to ensure accountability to the organisation.

At least one hour will be set aside for each session. After the first session, progress achieved against the objectives agreed at the last meeting is evaluated and key objectives set for the period to come.

## **Training Policy**

It is the responsibility all personnel, together with the management of DHDA to identify both individual and common training needs of staff and contractors. The Agency strives to meet the training needs of all staff/contractors, where possible. Staff and contractors are also encouraged to identify any gaps in training and to discuss them with their line manager.

All staff, volunteers contractors working with children and young people must complete child protection training such as Tusla's Children First e-Learning Module or an equivalent recognised child protection training accredited by Tusla or the Department of Children, Equality, Disability, Integration and Youth.

## **CODE OF BEHAVIOUR**

The child-centred ethos of DHDA creates an environment in which children and young people are valued, encouraged and listened to. We respect the rights of young people as individuals in society.

The following code of behaviour is established to provide a clear understanding of the standards of behaviour of all staff & contractors who work with DHDA for the purpose of the safe care of children and young people. It will help foster an environment where young people feel secure and are treated with dignity and respect.

- Staff/contractors are not permitted to give lifts in their cars to individual children and young people.
- Staff/contractors must be sensitive to the possibility of becoming over involved or spending a great deal of time with any one child or young person. We need to be clear about the purpose and nature of the relationship with any child or young person e.g. is the relationship constructive in building up the independence and autonomy of the person or is it being used to satisfy our own agenda.
- Staff/contractors should ensure, in so far as possible, that spaces which they use for activities with children and young people are safe and secure for the people in it.
- For experienced tutors, staff and contractors the ratio should be no more than 20:1.
- When dealing with young people with challenging behaviour, it is recommended, where possible, that more than one staff member is present.
- When dealing with group members of mixed sexes it is important that staff/contractors have sufficient personnel of both sexes to properly manage all activities and areas of any premises in use.
- Staff members and contractors should always be respectful of the privacy of young people in toilets. When present in such areas workers are advised not to spend time alone with a young person.
- Staff members and contractors should be sensitive to the risks in participating in some contact sports with young people and ensure that the young people are treated with dignity and respect.
- Children and young people should be encouraged to report cases of bullying to a staff member/volunteer of their choice.
- Staff and contractors should never physically punish or be in any way verbally abusive to a child or young person, nor should jokes of a sexual nature be told to or in the presence of a child or young person.
- Under no circumstances give alcohol, tobacco or drugs to children or young people.
- Do not use alcohol, tobacco or drugs in the company of children or young people.

- Use only age appropriate language media products and activities in working with children and young people.
- Do not take pictures of children or young people unless you have prior written parental consent to do so.
- All staff /contractors are required to maintain a positive attitude towards young people that respects the personal space, safety and privacy of individuals.
- If taking a group of children and young people away on a field trip you must ensure you have proper transport, adequate insurance cover, enough supervision and written parental consent. Facts must also be obtained of any specific medical conditions a young person suffer from and plans in place to deal with such, should the need arise.
- Never do anything of a personal nature for children and young people which they can do for themselves.
- Personal contact outside of learning programme business should not be made with children and young people.
- Staff/contractors may not connect with children and young people on social networks sites
- Staff/contractors may not contact the children and young people directly on their mobile phones – unless previously agreed in writing with the parents/guardians.
- Children and young people must not be left unsupervised at any time while on The Digital Hub campus.
- Attendance records for each class must be kept which should include the details of the participant and staff/contractors
- **Online and remote delivery:** Where learning programmes are delivered online or via hybrid/blended formats, staff and contractors must: not contact children and young people on their personal email accounts, private messaging apps, or social media. Maintain professional boundaries and conduct consistent with this Code in all online interactions. Be aware of safeguarding risks in online environments (e.g. isolation, unsupervised interaction, screen recording).
- **Physical intervention and restraint:** Staff and contractors must not use physical force or restraint except in emergency circumstances where a child is at immediate risk of serious harm. Any such incident must be reported immediately to the DLP.

All staff and contractors are required to follow the above code of behaviour, thus providing a safe, comfortable and positive environment for staff / contractors and young people.

### **The Safe Management of Activities**

In addition to the Code of behaviour all staff / contractors are required to follow the guidelines below when conducting any activity with children and young people:

- Each child / young person must be a registered participant on a DHDA learning programme
- Parental consent forms and contact details for parents / guardians for each child / young person taking part in any activity must be obtained.
- Ensure that all parents / guardians and children and young people are aware of our Child Protection policy and procedures
- Ensure all staff / contractors and children and young people are aware of emergency procedures for fire and other accidents
- All staff / contractors must follow the procedures for dealing with challenging behaviour.
- All activities carried out must be done so by qualified and experienced personnel.

- Any accidents must be recorded in either the Learning Studio Accident report form; the parents / guardians, programme coordinator and CEO of DHDA must be informed.
- Activities and/or outings undertaken must be covered by suitable insurance.
- Children and young people must not be left unattended during activities and sufficient supervision must be ensured at all times.
- A safety check will be carried out on all facilities and equipment utilised.
- Attendance records must be kept of all activities, outings etc. stating details of all participants, leaders, programmes etc.

### **Dealing with Challenging Behaviour**

Challenging behaviour can be defined as "behaviour which threatens staff / contractors, other people or the child / young person themselves, in a verbal and / or physical manner. When confronted with such behaviour staff / contractors must adhere to the following guidelines:

- Challenge the behaviour of the child / young person and not the person themselves.
- Try to remain as calm as possible and avoid becoming emotionally charged in dealing with the situation.
- Behaviour management must always emphasise positive approaches and prohibit any harsh or degrading actions.
- Consideration needs to be given to the developmental as well as the chronological age of the child / young person.
- Be aware of signals that may trigger further outbursts in the child / young person, such as change of tone of voice, body language etc.
- If the challenging behaviour presents itself with others around, either remove yourself and the child / young person away from others so you can talk in a calmer environment, or, ask another staff member / volunteer to take the others to an alternative location.
- It is always advisable to seek the support of another staff member / volunteer when confronting challenging behaviour.
- Outline to the child / young person the sanctions for their behaviour and discuss with them possible techniques they may adopt to avoid such situations in the future.
- Ensure you place yourself in an area with a clear escape route, should violence erupt.
- Given the nature of the situation and the extent of the challenging behaviour, the parents / guardians of the child / young person may need to be contacted and asked to collect the individual to take them home.
- Adequate time should be allowed for the child / young person to calm down and only then should their behaviour be discussed any supports and / or sanctions be imposed. Sanctions imposed must be fair and consistent at all times and understood by the child/ young person.
- Should your safety feel compromised and / or in danger, seek support from staff or security onsite and/ or Gardaí.
- All incidents will be recorded in the Incident report book
- Physical intervention and restraint: Staff and contractors must not use physical force or restraint except in emergency circumstances where a child is at immediate risk of serious harm. Any such incident must be reported immediately to the DLP.

## ROLE OF DESIGNATED LIAISON PERSON & REPORTING PROCEDURES

A Child Protection Designated Person has been appointed in DHDA. The Designated Liaison Person acts as a resource to any young person, staff member and volunteer who have Child Protection concerns. All dealings of a Child Protection nature go through the Designated Liaison Person who in turn may make a referral to the HSE or Gardaí.

### **Digital Hub Development Agency Designated Liaison Person:**

**Name:** Caroline Viguiet  
**Mobile:** 0870679907  
**Land Line:** 01 690 8007  
**Email:** cviguiet@thedigitalhub.com  
**Address:** DHDA, The Digital Depot, Thomas Street, D08 TCV4

### **The role of the Designated Person:**

- To report suspicions and allegations of Child Abuse to the Tusla – Child and Family Agency or the Gardaí.
- To ensure compliance with mandatory reporting obligations under the Children First Act 2015 and to report without delay to Tusla any reasonable belief that a child has been abused or is at risk of abuse, and to document all such reports.
- To provide training and guidance to staff and contractors on recognising abuse, reporting procedures, and their own responsibilities under the Children First Act 2015.
- To maintain a confidential child protection register recording all disclosures, concerns, suspicions and reports, with clear documentation of actions taken and outcomes.
- To provide information and advice on Child Protection within the organisation.
- To build up networks of support for the victim and for the staff/contractor making a referral.
- To ensure that the Child Protection policy and procedures are adhered to, and to inform the HSE of relevant concerns about individual children and young people.
- To give advice on individual cases, where appropriate.
- To advise on good practice and guidelines on Child Protection.
- To liaise with HSE, Gardaí and other agencies as appropriate.
- To keep the CEO of DHDA informed about any referrals.
- To maintain proper records on all referred cases in a secure and confidential manner.
- To ensure that all staff and contractors are familiar with the Designated Liaison Person and also that they each receive appropriate Child Protection awareness training, briefing and or information as appropriate.
- To ensure that all young people are familiar with the child protection policy by informing, briefing and providing accessible written information.
- To ensure that other persons interacting with children and young people at Digital Hub events activities and programmes are informed of, are aware of and understand the DHDA Child Protection Policy (Contractors, Tutors, Guest Speakers and Other Third Parties).
- To keep informed about current developments regarding the provision, practice, support services, legal obligations etc.

- To ensure that the issue of Child Protection is considered and the policy implemented as an integral part of the delivery of all events and programmes organised by DHDA.

The Designated Liaison Person is accessible to everyone in the organisation and is supported by on-going training and supervision. When she/he receives a report about suspected or actual abuse, she/he will consider whether there are reasonable grounds for reporting it to the HSE.

The following examples would constitute reasonable grounds for concern and should be reported:

- A disclosure from the child that he/she was abused.
- An account by a person who saw the child being abused.
- Evidence, such as injury or behaviour, which is consistent with abuse and unlikely, to be caused another way.
- An injury or behaviour, which is consistent both with abuse and with an innocent explanation, but where there are corroborative indicators supporting the concern that it may be a case of abuse. An example of this would be a pattern of injuries, an implausible explanation, and other indicators of abuse or dysfunctional behaviour.
- Consistent indication, over a period of time that a child or young person is suffering from emotional or physical neglect.

A suspicion, which is not supported by any objective signs of abuse, would not constitute a reasonable suspicion, or reasonable grounds for concern. However, these suspicions should be reported to the Designated Person who will record them internally as future suspicions may lead to the decision to make a report. A Child Protection tracking sheet may also be started at this point by the staff person/ contractor, in conjunction with the Designated Liaison Person. In such a case further reports and observation may lead to reasonable ground and referral to the HSE.

### **Dealing with Disclosure / Reporting Procedure**

Should a young person disclose abuse to you the following important points should be taken into consideration:

- Take what the young person says seriously.
- Be as calm and as natural as possible. Remember that you have been approached because you are trusted and possibly liked. Do not panic.
- Be aware that disclosures can be very difficult for the child or young person.
- Reassure the child or young person that it was right to tell somebody what happened and that they have done nothing wrong.
- Remember that the child or young person may initially be testing your reactions and may only fully open up over a period of time.
- Listen to what the child or young person has to say. Give them the time and opportunity to tell as much as they are able and wish to. Do not pressure the child or young person. Allow him/her to disclose at their own pace and in their own language.
- Be careful when asking questions. Your job is **not to investigate** but to support the child or young person. Avoid leading questions such as whether a specific person carried out the abuse, or whether specific acts mentioned by the child or young person occurred. Such questions may complicate an official investigation.
- Do not express any opinion about the alleged abuser to the child or young person.

- It may be necessary to reassure the child or young person that your feelings towards him/her have not been affected in a negative way as a result of what he / she has disclosed.
- Do not promise to keep secrets. At the earliest opportunity tell the child or young person that you acknowledge that they have come to you because they trust you. Tell him / her that there are secrets which are not helpful and should not be kept because they make matters worse. Such secrets hide things that need to be known if people are to be helped and protected from further on-going hurt. By refusing to make a commitment to secrecy to the child or young person, you do run the risk that they may not tell you everything or indeed anything, there and then. However, it is better to do this than to tell a lie and ruin the child or young person's confidence in yet another adult. By being honest, it is more likely that he/she will return to you at another time.
- At the earliest possible opportunity record in writing what the child or young person has said, including as far as possible, the exact words uttered by him / her. Record facts only, no opinions or hearsay.
- Pass on all information to the Designated Liaison Person and not to any other third party, as disclosures are on a need-to-know basis only.
- The Designated Liaison Person will carry out the necessary steps in making a referral to the HSE.

Where the disclosure involves information about a serious offence against a child, the staff member should be aware that under the Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012, there may be a legal duty to report the information to An Garda Síochána, in addition to reporting through the Designated Liaison Person. The Designated Liaison Person will advise on obligations in specific cases.

### **Ongoing Support**

Following a disclosure by a child or young person, it is important that the DHDA staff and contractors continue in a supportive relationship with the child or young person. Once the Designated Liaison Person makes the referral to the HSE, our duty to care on the disclosure is passed on. Disclosure is a huge step for many children and young people and support should be continued through:

- Maintaining a positive relationship with the child or young person.
- Keeping lines of communication open by listening to the child or young person.
- Continuing to include the child or young person in the usual activities.

Any further disclosures should be treated as a first disclosure and responded to accordingly.

### **Dealing With a Suspicion of Child Abuse**

In situations where a suspicion / concern may be deemed vague i.e. where there is no specific allegation but there is some concern based on the emotional behaviour and/or physical presentation or behaviour of the child, then staff/contractors should consult the Designated Liaison Person for advice. The Designated Liaison Person will assess whether or not a report is warranted and will seek the advice of the Tusla if required. Details of the consultation will be recorded and filed. A formal report to the Tusla may follow as advised.

## DEALING WITH ALLEGATIONS

If an allegation is made against a staff member or contractor working with or delivering programmes on behalf of The Digital Hub then two separate procedures will be followed:

- The reporting procedure in respect of the child or young person
- The procedure for dealing with the staff member or contractor

These procedures, according to Children First: National Guidance for the Protection and Welfare of Children should be followed in the event of suspicion or disclosure of abuse against an employee or contractor. In this situation, DHDA must have due regard for the rights and interest of the child or young person on one hand, and those of the person against whom the allegation is made on the other hand.

**Mandatory Reporting of Allegations:** Any allegation of child abuse made against a staff member, contractor or volunteer must be reported to Tusla, in addition to any internal disciplinary investigation. This is a mandatory reporting requirement under the Children First Act 2015. The Designated Liaison Person is responsible for ensuring that this report is made without delay

The CEO of DHDA will deal with the staff member, contractor or service provider (if applicable) in question, while the Designated Liaison Person will have the responsibility of dealing with the reporting issue and supporting the child or young person. Staff / contractors may be subjected to erroneous or malicious allegations; therefore any allegation of abuse should be dealt with sensitively and support provided for staff as well as the child or young person, including counselling where necessary. However, the primary goal is to protect the child or young person while taking care to treat the staff member/contractor fairly.

When the CEO of DHDA becomes aware of an allegation of abuse of a child or young person by a staff member / contractor, if appropriate, he/she will inform that person of the following:

- The fact that an allegation has been made against him / her.
- The nature of the allegation.

The staff member / contractor will be afforded an opportunity to respond. The CEO will note the response and pass on the information if and when a formal report is made to the HSE.

It is important to note that "The Protection for Persons Reporting Child Abuse Act, 1998" applies equally to organisations provided they report the matter "reasonably and in good faith".

DHDA accepts the possibility that a number of factors may have a bearing on the organisation and will need to be considered:

- Possible reactions of other members of staff / contractors including anger, disbelief, doubt, fear, guilt, shock, anxiety and confusion.
- The effects on the alleged abuser of the internal disciplinary proceedings, the Child Protection investigation and the criminal investigation.
- The reactions of other staff / contractors and the other children and young people towards the child or young person who has been abused or whose allegation is being investigated.

- The reaction of parents / carers and other family members of the child or young person.

Through a series of basic Child Protection awareness training programmes, all persons involved in The Digital Hub will be given the opportunity to discuss such issues in an open and non-threatening environment.

NOTE: Should an allegation be made against the CEO of DHDA, the Chairperson of the Board will step in to deal with the situation.

### **Procedures for Dealing with Employees and Contractors**

- The first priority will be to ensure that no child or young person is exposed to unnecessary risk and as such any necessary protective measures will be taken e.g. suspension of the staff member / contractor. These measures will be proportionate to the level of risk and will not unreasonably penalise the worker financially, or otherwise, unless necessary to protect children and young people.
- It may be necessary for the CEO to seek legal advice for any action following an allegation against a staff member / contractor. A meeting may need to be arranged with the HSE / Gardaí to discuss the allegation.
- The CEO will inform the person accused on the outcome of the above consultation.

Pending the outcome of the investigation by the HSE and/or Gardaí the staff member / contractor may:

- Be re-assigned to duties that do not involve contact or access to children and young people, depending on the nature of the allegation.
- Be suspended.

The staff member / contractor will be offered counselling, should the need arise.

## RECORD KEEPING

The Designated Liaison Person is responsible for keeping the following records related to Child Protection in a locked filing cabinet. The Designated Liaison Person and the CEO of DHDA are the only officers who have access to these records:

- Any complaints about the safety and welfare of children and young while working attending programmes at The Digital Hub.
- Any disclosures, concerns or allegations of child abuse.
- The follow up to any complaints, disclosure, concerns or allegations, including advice from Tusla, reports to Tusla and informing parents/guardians.
- Any bullying complaints related to children and young people and the follow up action.
- Signed acceptance forms of the DHDA Child Protection Policy by staff members / contractors and Third-party suppliers working to deliver DHDA Learning Programmes.
- All National Vetting Bureau Forms.
- All Parental/Guardian Consent Forms.

Note: A computer record of Garda Vetting is also kept. Its access will be restricted to the Designated Liaison Person and the CEO of DHDA

## CONFIDENTIALITY AND INFORMATION SHARING

Working with children and young people involves the development of trusting relationships where it may be common for children and young people to divulge personal information. Therefore, all staff and contractors need to be aware that a young person or a colleague may disclose that they are being abused or know of someone who is being abused.

Confidentiality is about managing sensitive information in a manner that is respectful, professional and purposeful. All information provided to DHDA by a child or young person, contractor or staff member must be treated in a confidential manner. All staff and contractors have a responsibility to handle all sensitive information in line with DHDA's code on confidentiality.

### **Code of Confidentiality**

- All information regarding a Child Protection concern or suspected case of Child Abuse must be only shared on a 'need to know basis' and always in the best interests of the child's general welfare and safety. The subject should never be discussed with other persons in the organisation, including staff, contractors or young people if they are not directly involved.
- the case of a Child Protection concern, staff and contractors must not promise confidentiality to the child or young person. They must clearly explain that the information will be shared with the Designated Liaison Person and, where necessary, with Tusla and An Garda Síochána to protect the child. This ensures the child understands that the disclosure will be acted upon appropriately.
- Sharing information with an appropriate / designated person for the protection of a child is not a breach of confidentiality. Codes of confidentiality do not intend to prevent the exchange of information between individuals who have a responsibility to protect children and young people.
- Personal information, which is gathered for a specific purpose, should never be used for any other purpose without consulting the person who provided that information.
- All staff and contractors working with children and young people must have some training on understanding of the importance of confidentiality and the limitations of confidentiality in relation to Child Protection issues

### **Exchange of Information**

- All staff and contractors should be aware that ensuring Child Protection is only possible in the organisation if all staff and contractors share relevant information. Also to ensure Child Protection, the organisation must work in partnership with the HSE and the Gardaí.
- Any person who receives information from colleagues about possible or actual Child Abuse must treat it as having been given in confidence and follow the organisation's reporting procedures.
- It is also necessary that any records of incidents, disclosures, or concerns of a Child Protection nature are only accessible to those who should have access to the records because of a need to know.
- Reports that are made to the Designated Person can still be followed up on after being shared with the statutory agencies. However, it should be noted that not giving the name of the person making the report can make it more difficult to assess a situation.

- Under the Children First Act 2015 and associated guidance, information about suspected or actual abuse of a child must be shared with Tusla without delay. This is not a breach of confidentiality; rather, it is a legal obligation to protect the child. Staff and contractors should be aware that confidentiality must yield to the paramount duty to protect children from harm.”

**Record Retention Schedule**

All child protection records will be retained in accordance with the following schedule:

Record Type	Retention Period	Basis
Disclosures, concerns, allegations, Tusla reports	Minimum 7 years after the child reaches 18 years of age, or longer if required by legal proceedings	Children First guidance; potential future disclosures
Garda Vetting & Vetting clearance records	<ul style="list-style-type: none"> <li>- Retain original NVB1 form for the initial 6 month at a minimum.</li> <li>- After the initial 6-month period a soft copy of the NVB1 form will suffice.</li> <li>- Soft copies of proof of identity and proof of address documents</li> </ul>	Data Protection Act 2018; GNVB Validation of Identity and Consent Document; potential future reference checks
Consent forms	Duration of participation + 3 years	Parental consent; potential future queries
Training records	During employment + 3 years	Compliance audit trail
Accident/Incident reports	Minimum 7 years	Health and safety; potential future injury claims

All records will be securely destroyed at the end of the retention period, unless legal proceedings are ongoing.

**Data Protection and Confidentiality in Record-Keeping**

All records will be held in compliance with the Data Protection Act 2018 and GDPR. Access will be restricted to the Designated Liaison Person and CEO. Records will be kept in a secure, locked location. Computer records (e.g. vetting tracking) will be password-protected. No information will be shared beyond those with a need to know, except where

required by law (e.g. to Tusla, An Garda Síochána) or in response to a lawful Data Subject Access Request.

## WORKING WITH OTHER AGENCIES

This policy establishes the responsibilities of all who work for and with DHDA including contractors with regard to the protection of children and young people when working with or when brought into contact with, children and young people and will be brought to their attention during their induction programme to the organisation.

Given the nature of the programs that we deliver and the interaction which takes place with various people such as staff, members of our campus, contractors, freelancers, independent companies and visitors these guidelines will apply to all concerned.

In many instances, a Third-Party Service Provider is contracted by DHDA to deliver learning programs to children and young people on The Digital Hub campus.

### **Where a third-party service provider is contracted by DHDA:**

- **Child Safeguarding Statement:** The service provider must have prepared and published a Child Safeguarding Statement compliant with Section 11 of the Children First Act 2015, setting out how it manages safeguarding risks. A copy must be provided to DHDA before the contract commences.
- **Vetting and Recruitment:** All staff and contractors of the service provider who will have contact with children must have undergone National Vetting Bureau clearance and comply with recruitment procedures equivalent to those set out in this policy.
- **Training and Awareness:** All staff and contractors of the service provider must receive accredited child protection training (equivalent to Tusla Children First e-Learning or better) before commencing work with children, and annually thereafter.
- **Designated Liaison Person:** Each service provider must have appointed a Designated Liaison Person who will be the point of contact for reporting concerns arising during the provision of programmes on the DHDA campus.

### **Reporting Guidelines**

If there is an allegation or disclosure made by a child or young person to a staff member or contractor working in The Digital Hub but engaged by a Third-Party Service Provider, then:

- The staff member/contractor must immediately notify the Designated Liaison Person for the service provider and simultaneously inform the DHDA Designated Liaison Person.
- The Designated Liaison Person for the service provider will share information on a “need to know basis” with the Designated Liaison Person in DHDA.
- DHDA’s Designated Liaison Person will determine whether a report to Tusla should be made and will make such a report if reasonable grounds exist, regardless of whether the service provider has or has not done so.

## ACCIDENTS / INCIDENTS

All accidents, however minor, should be recorded on the Accident report form (Appendix 12).

The report should be completed and forwarded to DHDA immediately.

In the event of an accident, parents or guardians should be informed immediately. Where medical attention is required, this should be sought as a matter of urgency and recorded in the accident report form.

Serious accidents or incidents that may amount to abuse or neglect must also be reported to the Designated Liaison Person and, where reasonable grounds for concern exist, to Tusla. Accident reporting and child protection reporting are separate processes, and both must be followed

## DEALING WITH COMPLAINTS (NOT CHILD PROTECTION ISSUE)

It is the policy of DHDA to encourage young people and their parents to provide comment and feedback on any aspect of our programmes, inclusive of any complaints they may have.

DHDA is committed to this practice, as it is acknowledged that an open, transparent environment benefits all stakeholders of the organisation and allows the Agency to monitor and regularly review programmes. This forms an integral part of the organisation's commitment to best practice.

### **What is a complaint?**

A complaint is any form of criticism or suggestion in respect to any aspect of a service or programme. A complaint should not be confused with a Child Protection concern for which the reporting procedure must be followed. When a complaint is received that leads to a concern about a child's safety or well-being, DHDA must ensure that it acts appropriately and in the best interests of the child, and that Children First: National Guidance for the Protection and Welfare of Children guidelines are implemented as appropriate. The welfare of the child is paramount at all times.

A distinction must also be made between:

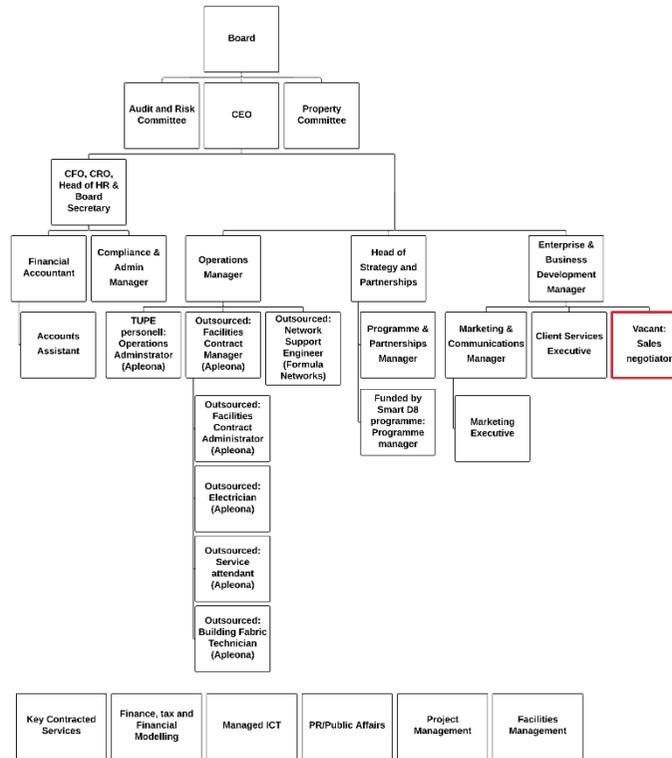
- Minor complaints that can be handled informally and internally within the class environment.
- Complaints requiring a formal process within a Third-Party Service Provider
- Complaints requiring a formal process within DHDA.

### **Steps to be followed in handling complaints:**

1. Any member of staff or contractor with DHDA may take a complaint from any young person or parent.
2. All young people and parents of young people who attend classes on The Digital Hub campus are fully entitled to give comment or feedback, whether positive or negative, on any aspect of the learning initiative.
3. A complaints form must be completed by the person making the complaint. A member of staff can support a person in doing this.
4. Staff and contractors must submit this form to the Strategic Initiatives Manager in DHDA.
5. All complaints are monitored by the manager to make changes to programmes / events if necessary, to ensure a quality service is being provided. Any action to be taken will be recorded on the complaints form.
6. The person who made the complaint will be responded to in writing within ten working days, unless otherwise requested.
7. If the manager considers it necessary, a meeting will be organised between the manager and the person who made the complaint.
8. The person will be informed if there is any follow-up action or recommendation for change as the result of the complaint. If it is deemed unnecessary to make any change, the person who made the complaint will be informed of the reason for this.
9. If a complaint involves any concern about a child's safety, welfare or wellbeing, or could constitute child abuse, the matter must be immediately referred to the Designated Liaison Person and the procedures in the "Dealing with Disclosure/Reporting Procedure" section of this policy must be followed, in addition to the complaints process. The welfare of the child is paramount.

## APPENDICES

# 1. DHDA ORGANISATION CHART



## 2. DEFINITION OF CHILD ABUSE

Child Abuse is generally described under the following five headings:

### **Neglect**

Neglect can be defined in terms of an omission, where the child or young person suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults and medical care. The threshold of significant harm is reached when the child's needs are neglected to the extent that his or her wellbeing and/or development are severely affected.

### **Emotional Abuse**

Emotional abuse is normally to be found in the relationship between the caregiver and a child or young person rather than a specific event or pattern of events. It occurs when a child or young person's need for affection, approval, consistency and security are not met. Unless other forms of abuse are present, it is rarely manifested in terms of physical signs or symptoms. Examples of emotional abuse include:

- The imposition of negative attitudes on children and young people, expressed by persistent criticism, sarcasm, hostility or blaming.
- Conditional parenting.
- Emotional unavailability by the child or young person's parent/carer.
- Unrealistic, inappropriate expectations of the child or young person.
- Failure to show interest in, or provide age-appropriate opportunities for the child or young person's cognitive and emotional development.
- Unreasonable or over harsh disciplinary measures.
- Exposure to domestic violence.

The threshold of significant harm is reached when abusive interactions dominate and become typical of the relationship between the child or young person and the parent/carer.

### **Physical Abuse**

Physical abuse is any form of non-accidental injury or injury which results from the wilful or neglectful failure to protect a child or young person. Examples of physical abuse include:

- Shaking a child or young person
- Use of excessive force in handling a child or young person
- Deliberate poisoning
- Suffocation
- Munchausen's syndrome by proxy

### **Sexual Abuse**

Sexual abuse occurs when a child or young person is used by another person for his or her gratification or sexual arousal or for that of others. Examples of sexual abuse include:

- Exposure of the sexual organs or any sexual act intentionally performed in the presence of a child or young person.
- Intentional touching or molesting of the body of a child or young person whether by a person or object for the purpose of sexual arousal or gratification.

- Sexual intercourse with a child or young person be it oral, anal or vaginal.
- Sexual exploitation of a child or young person.

### **Bullying**

Bullying can be defined as repeated aggression be it verbal, psychological or physical which is conducted by an individual or group against others. Examples of bullying include:

- Teasing
- Taunting
- Threatening
- Hitting
- Extortion

Bullying may take place in any setting whether it be in schools, the home or in a youth service setting. The more extreme forms of bullying would be regarded as physical or emotional abuse.

While Child Abuse has been defined under the above five headings of neglect, emotional abuse, physical abuse, sexual abuse and bullying, due consideration should also be given to instances of organised abuse and peer abuse.

### **Organised Abuse**

This occurs when one person enters into an area or institution and systematically entraps children or young people for abusive purposes (mainly sexual) or when two or more adults conspire to abuse children and young people using inducements or threats.

### **Peer Abuse**

In some cases of abuse the alleged perpetrator will also be a child or young person. In these situations, the Child Protection procedures should be adhered to for both the victim and the alleged abuser. If there is any conflict of interest between the welfare of the alleged abuser and the victim, the victim's welfare is of paramount importance.

### 3. RECOGNISING SIGNS AND SYMPTOMS OF CHILD ABUSE

The following are some of the possible indicators of Child Abuse:

#### **Physical Indicators**

- Frequent bruising, fractures, cuts, burns and other injuries.
- Signs of neglect e.g. dirty appearance, undernourished looking.
- Failure to thrive.
- Genital injuries or soreness.
- Haemorrhages (retinal, subdural).
- Sexually transmitted infections.
- Pregnancy.

#### **Emotional Indicators**

- Unreasonable mood and/or behavioural changes.
- Aggressive or withdrawn.
- Lack of attachment.
- Depression or suicide attempts.
- Persistent nightmares, disturbed sleep, bedwetting, reluctance to go to bed.
- Fear of adults.
- Lack of peer relationships.
- Fear of the dark.
- Panic attacks.

#### **Behavioural / sexual indicators**

- Over affectionate or inappropriate sexual behaviour or knowledge given the child's age – often demonstrated in language, playing or drawings.
- Fondling or exposure of genital areas – open masturbation.
- Sexually aggressive behaviour with others.
- Hints about sexual activity.
- Unusual reluctance to join in normal activities, which involve undressing, e.g. games, swimming.
- Overtly compliant and submissive.
- Strong dislike of physical contact.
- Prostitution – giving sexual favours in return for gifts or money.

#### **Changes in normal behaviour for the person in question**

- Unwillingness to participate in certain activities or to go to certain places that once may have been liked.
- Running away from school or avoiding school.
- Separation activity.
- Isolation.
- Tiredness and poor concentration.
- Unexplained display of wealth or gifts (bribes) or a constant shortage of money and loss of good equipment, clothes etc. (taken by bullies).

#### **Illness**

- Eating disorders such as overeating or anorexia.
- Alcoholism and/or drug addiction.
- Psychosomatic disorders.

Some signs are more indicative of abuse than others. These include:

- Disclosure of abuse by a child or a young person.
- Age inappropriate or abnormal sexual play or knowledge.
- Specific injuries or patterns of injuries.
- Under-age pregnancy or sexually transmitted infections.

**Particular behavioural signs and emotional problems suggestive of Child Abuse in young children (0 – 10 years)**

- Mood change e.g. child becomes withdrawn, fearful, acting out.
- Lack of concentration (change in social performance).
- Bed wetting, soiling.
- Psychosomatic complaints, pains, headaches.
- Skin disorders.
- Nightmares, change in sleep patterns.
- School refusal.
- Separation anxiety.
- Loss of appetite.
- Isolation

**Particular behavioural signs and symptoms suggestive of abuse in older children (10+ years)**

- Mood change e.g. depression, failure to communicate.
- Running away.
- Drug, alcohol, solvent abuse.
- Self-mutilation.
- Suicide attempts.
- Delinquency.
- Truancy.
- Eating disorders.
- Isolation.

All signs/indicators need careful assessment relative to the child's circumstances.

**NOTE: In the area of Child Protection the current legal age of consent for sexual intercourse is 17.**

It is important to remember that even for the experts, Child Abuse is very difficult to prove and the above are possible indicators of abuse. The most important point is that you know the children and young people you are working with, are they generally quiet or generally boisterous etc. By knowing the children and young people it will be easier for you to notice any changes in appearance or behaviour that may cause concern.

## 4. ANTI-BULLYING POLICY

### **Definition of Bullying**

Bullying can be defined as repeated aggression be it verbal, psychological or physical which is conducted by an individual or group against others.

### **Types of Bullying**

(Taken from "Bullying at School: Key Facts" by The Anti-Bullying Centre, Trinity College Dublin, 2001)

There are many different types of bullying that can occur:

- **Verbal Bullying:** can leave children and young people feeling angry, frightened and powerless. If they are unable to share their feelings with someone else, verbal bullying can leave them emotionally bruised and physically exhausted. Their powers of concentration can suffer, adversely affecting their capacity for learning. Verbal attacks can be of a highly personal and sexual nature. They can be directed at the child's or young person's family, culture, race or religion. Malicious rumours are particularly insidious forms of verbal bullying.
- **Physical Bullying:** often written off as "horseplay", "pretend" or "just a game" when challenged. While children and young people can and do play roughly, in the case of bullying be aware that these "games" can be a precursor to vicious physical assaults. Both boys and girls indulge in physical bullying, boys perhaps more so as they have a greater tendency towards physical aggression.
- **Gesture Bullying:** there are many different forms of non-verbal threatening gestures which can convey intimidating and frightening messages, for example gesturing a gun to a head or gesturing slitting a throat.
- **Exclusion Bullying:** this is particularly hurtful because it isolates the child or young person from his/her peer group and it is very hard for the child or young person to combat as it directly attacks their self-confidence and self-image.
- **Extortion Bullying:** younger children are particularly vulnerable to extortion bullying. Demands for money, possessions, equipment etc. may be made, often accompanied by threats. Children or young people may also be dared or forced to steal from others leaving them at the mercy of the bully and open to further intimidation.
- **Cyber Bullying:** in an ever-more technologically advanced world, a new strain of bullying has emerged amongst children and young people, which utilised web pages, e-mails and text messaging to abuse, intimidate and attack others, either directly or indirectly (for example rumour mongering).

### **Policy Statement**

All staff and contractors who work for and with DHDA are committed to creating an environment that is safe and supportive to all children and young people. We believe that all children and young people with whom we work have the right to be protected from bullying and abusive behaviour. Bullying in any form is unacceptable in DHDA.

### **Aim of Policy**

The aim of this policy is to ensure that all children and young people are protected from bullying behaviour. It is hoped that the policy will reduce the number of children and young

people who experience bullying. The policy aims to ensure that incidents of bullying will be dealt with consistently and in a fair manner by setting out the procedures for dealing with such instances.

### **Objectives of Policy**

- To raise awareness of bullying as a form of unacceptable behaviour with staff / contractors, children and young people and parents / guardians.
- To develop an ethos which encourages children and young people to report incidents of bullying.
- To develop systems for recording and reporting incidents of bullying behaviour.
- To involve children and young people in promoting DHDA's anti-bullying policy, through class projects, active inclusion etc.
- To develop clear procedures for investigating and dealing with incidents of bullying behaviour.
- To create awareness of the support services for those affected by bullying and for those involved in bullying behaviour.
- To ensure comprehensive supervision and monitoring measures are employed for all activities with young people and children.

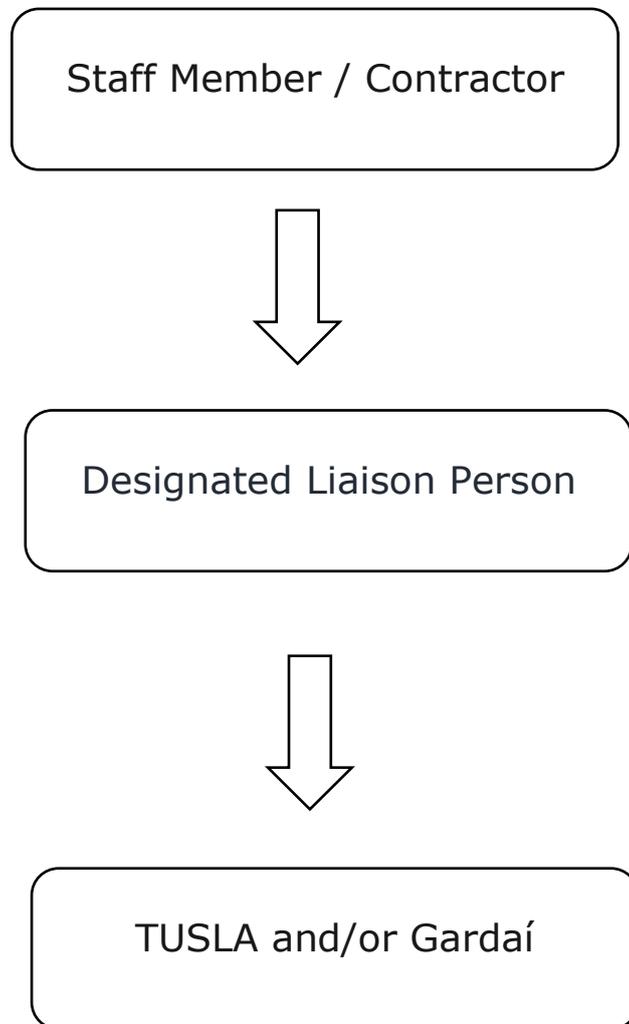
### **Procedures for Dealing with Bullying**

- In any incident of bullying, a staff member / contractor should speak separately to the children or young people involved to get both sides with due regard to the rights of each person involved.
- All reports of bullying will be recorded, investigated and dealt with by an appropriate staff member / contractor.
- The staff member / contractor will interview all involved in a calm manner and will seek answers to what, where, when, who and why.
- The child or young person should be praised for their courage in coming forward to report the bullying incident and or behaviour.
- Reassure the child or young person that being bullied is the responsibility of bullies and they are not to blame themselves.
- Reassure the child or young person of the support of staff in DHDA in ensuring that the bullying doesn't happen again.
- If the staff member / contractor dealing with the complaint concludes that bullying has taken place, then the perpetrator will be met with to discuss the bullying behaviour. They will be informed of the disciplinary action that will be taken as a result of this bullying behaviour and will be supported in undertaking any relevant training and interventions to address their inappropriate behaviour.
- Staff members / contractor will at all times be sensitive to the needs of the young person, who may not wish it be made known that they reported an incident of bullying. Such incidents will be dealt with in group work and/or key working sessions.
- Parents will be informed of the incident of bullying and of the outcome of the investigation.
- For less serious incidents of bullying, the child or young person will be asked to apologise to the victim and asked not to engage in any further bullying behaviour. Examples may include slagging, name calling, gestures etc. Staff / contractors would then closely monitor the behaviour of the child or young person.
- For serious incidents of bullying, the perpetrator will be suspended or excluded from training / activities, depending on the nature of the incident(s). Examples may include assaults or threats of physical assaults, exclusion, racist remarks,

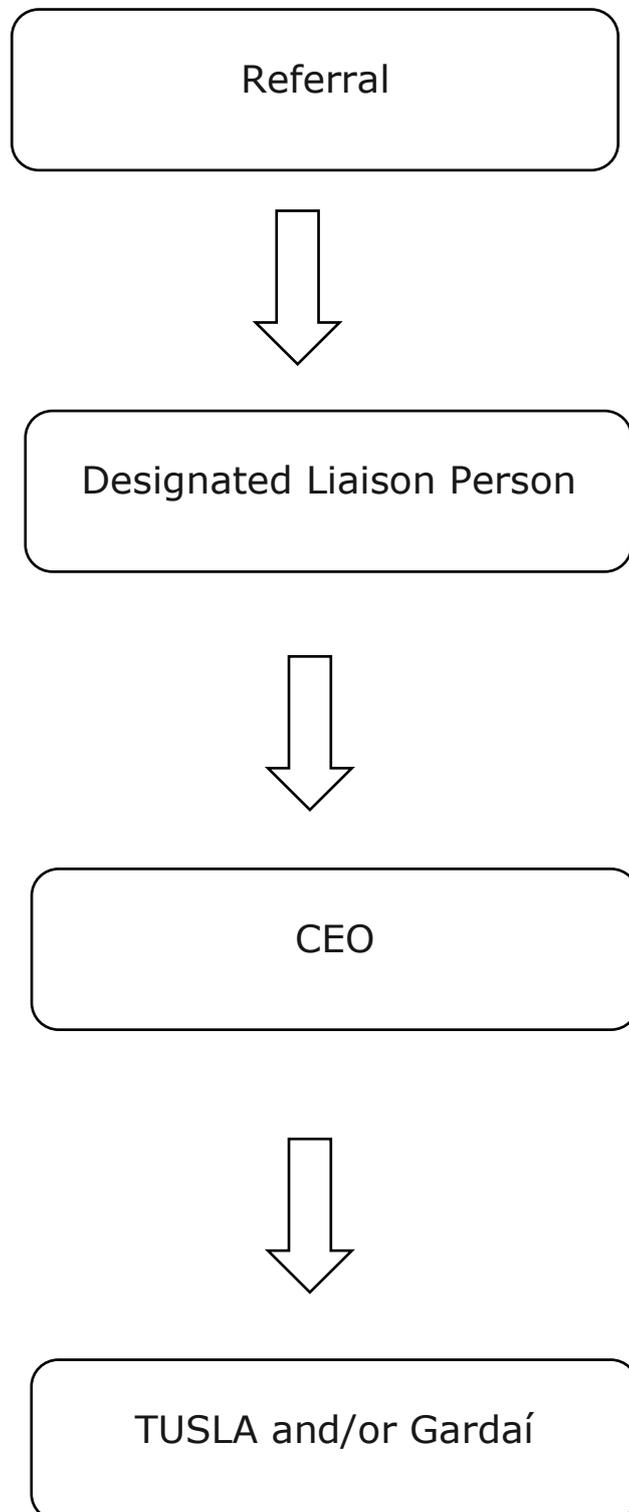
homophobic comments etc. and may require referral to HSE. All serious incidents of bullying should be discussed with the Designated Liaison Person.

- The examples given above are not exhaustive and as such the Anti bullying policy, along with the other sections of this document, is under constant review.

5. INTERNAL REFERRAL PROCEDURE CHART

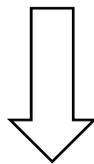


6. ALLEGATIONS AGAINST A STAFF MEMBER / CONTRACTOR  
CHART

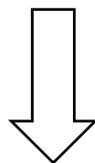


7. ALLEGATIONS AGAINST CEO CHART

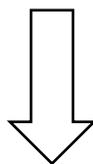
Referral



Designated Liaison Person



Chairperson



TUSLA and/or Gardaí

## 8. STANDARD REPORTING FORM

This form is available from the Designated Liaison Person or from this link:

<https://www.tusla.ie/services/child-protection-welfare/publications-and-forms/>

## 9. TUSLA SOCIAL WORKER / GARDA CONTACT NUMBER

TUSLA

### Dublin South Central Dedicated Contact Point

DISCUSS/REPORT A CONCERN	
Contact details if you need to report a concern about a child or need to discuss a concern	
	Carnegie Centre, 21-25 Lord Edward Street, Dublin 2 D08 X81F
	01 6400650

Kevin Street Garda Station:

- Kevin Street Garda Station,
- 41 Upper Kevin Street,
- Dublin 8
- D08 PW26.
- +353 1 666 9400



FOR OFFICE USE ONLY – Not to be completed by applicant

## Identity Document Validation Form

Your Ref:

### Section 1: Photographic ID

- Is the photographic document, being relied upon, current and not expired?  Yes  No
- Is the photograph on the document a true likeness for the vetting subject?  Yes  No
- Is the photograph of high quality and clear?  Yes  No
- Is the date of birth on the document matching the date provided on the NVB1 Form?  Yes  No
- Is the name on the document exactly matching the name provided on the NVB1 Form?  Yes  No

### Section 2: Proof of Address

- Is the address document dated within six months of the consent date?  Yes  No
- Is the address on the proof of address document matching the address provided on the NVB1 Form?  Yes  No
- Is the vetting subject's name included on the proof of address document?  Yes  No
- Is the document acceptable as proof of address document, as per Identity Document Schedule?  Yes  No

### Section 3: NVB1 Form

- Is the NVB1 form dated and signed by the vetting subject?  Yes  No
- Is the role accepted to be relevant work or activity?  Yes  No
- Is the Consent Box ticked?  Yes  No

### Section 4: Document Confirmation

I have physically seen and retained/forwarded a copy of the following documents: (Please check all that apply)

- Completed NVB1 Form (original)  Yes  No
- Photographic ID document type: \_\_\_\_\_  Yes  No
- Document Reference No. \_\_\_\_\_
- Proof of address document type: \_\_\_\_\_  Yes  No

If you have answered **No** to any of the above questions the vetting subject has not met the criteria to continue with the vetting process

### Section 5: Validator Information

- Validator's Name (PRINT NAME): \_\_\_\_\_
- Validator's Signature: \_\_\_\_\_
- Validator's Role: \_\_\_\_\_
- Validator's Contact Number: \_\_\_\_\_
- Date of Validation: \_\_\_\_\_

06/2025

# 11. ACCIDENT/INCIDENT FORM

## ACCIDENT / INCIDENT / NEAR MISS REPORT & INVESTIGATION FORM



The purpose of this report is to record the details of the accident/ incident and identify the cause of the accident or dangerous occurrence (near miss) and determine what action is required to prevent a similar occurrence. This form is to be completed by the person involved in the incident and line manager.

### 1. Person Involved in the incident/dangerous occurrence

Injured or affected person	
Reported by	
Issued To: Acacia Operations Manager	

Where applicable please state if the person(s) involved is a visitor/contractor and reason for their presence.

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### 2. The Accident/Incident

Exact Location	
Date of Incident	
Time of Incident	
Date Reported	
Witness(es) Names (if any)	

### 3. Describe the Accident/Incident (including events leading up to the incident)

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*(Use additional Sheets if necessary) (Attach pictures and picture descriptions where relevant)*

### 4. Injury/Damage

Did the incident result in injury? Yes / No	
Describe nature of Injury (if Yes)	
Date injury was detected (if different from Incident Date)	

Was First Aid Administered (Yes/ No)	
Name of First Aider	
Was the injured person(s) taken to hospital	
Name of Doctor attending to injured person (if applicable)	

Did the incident result in any damage to property, equipment or the environment.	
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