



Housing | Health | Recovery

POLICY DOCUMENT

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REVISION HISTORY

Date Revised	Section	Change	Initials
13/07/2018	All	Replaces the following organisation policies: 1. Dealing with allegations of abuse against an employee 2. Standard Reporting Procedure 3. Code of Behaviour between staff & Young People 4. Child Abuse – Definitions & Recognition 5. Child Protection Policy 6. Designated Liaison Person for Child Protection	MVP, PG, GM, RR, PS
13/07/2022	All	Policy transferred to new policy template, Full review of policy against Tusla's: Child Safeguarding: A Guide for Policy, Procedure and Practice 2nd Edition	JD, MV
27/04/2023	Various	Cover page, 'Child Care Act 1991' added '-2013'. Section 5.2 removed 'who is not or has not been married'. Added '5.10 Unaccompanied Minor – An unaccompanied person under the age of 18 seeking international protection. (Section 14 International Protection Act 2015)'.	UD

POLICY RELATION

Relevant legislation, statutory instrument or guideline	✓
Child and Family Agency Act 2013 , Child Care Act 1991-2013, Children Act 2001, Children First Act 2015	✓
Criminal justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012, Criminal Justice Act 2006, Section 176: Reckless Endangerment of Children	✓
National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016	✓
Non-Fatal Offences against the Person Act 1997	✓
Data Protection Acts 1988 and 2003, Freedom of Information Act 2014, Protected Disclosures Act 2014, Protections for Persons Reporting Child Abuse Act 199	✓
Domestic Violence Act 1996	✓
Education (Welfare) Act 2000, Education Act 1998	✓

*Policies in draft format or under review are applicable until such time as they are replaced by a new policy

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1 Intention & Purpose

- 1.1 The purpose of this policy is to guide the work of all staff who provide services to children and families throughout their working day. The aim is to enable all NOVAS staff to understand and carry out the organisation's safeguarding procedures that have been informed by the Children's First Act 2015 and other related legislation.
- 1.2 NOVAS is committed to providing safe and quality driven services to all our clients and staff. It is the policy of the organisation that the welfare and safety of children are paramount. We recognise the rights of children to be protected from harm and treated with dignity and respect.

2 Scope

- 2.1 These guidelines cover all NOVAS services, staff and volunteers.

3 Principles

- 3.1 Safeguarding is more than just reporting child protection or welfare concerns; it is also asking how can we add to the child or young person's life to assist them to fully meet their future potential. Seeking positive outcomes for children and young people is also about staying involved, remaining interested and actively participating with others to improve the child or young person's life.
- 3.2 The welfare and safety of every child and young person who attends our service is paramount.
- 3.3 Our guiding principles and procedures to safeguard children and young people reflect national policy and legislation, as outlined on the front page of this policy, and we will review our guiding principles and child safeguarding procedures every two years.
- 3.4 All children and young people have an equal right to attend a service that respects them as individuals and encourages them to reach their potential, regardless of their background. NOVAS will ensure no child or young person is disadvantaged or treated

differently because of gender, social or ethnic background, family status, sexual orientation, religion or disability.

- 3.5 We are committed to upholding the rights of every child and young person who attends our service, including the right to be kept safe and protected from harm, listened to and heard.
- 3.6 Our guiding principles apply to all paid staff, volunteers, committee or board members, and students on work placement within our organisation. All committee or board members, staff, volunteers, and students must sign up to, and abide by these guiding principles and our child safeguarding procedures.
- 3.7 Workers and volunteers must conduct themselves in a way that reflects the principles of our organisation
- 3.8 NOVAS will inform all children, young people and parents and guardians of our guiding principles on arrival.

4 Roles & Responsibilities

- 4.1 In line with legislation and best practice guidelines, NOVAS has identified several key roles that have clear responsibilities for the delivery of this policy:
 - 4.1.1 **A designated named person:** with responsibility for developing, reviewing, and implementing child protection policies and procedures. The Designated Named person in NOVAS is the Manager of the relevant service.
 - 4.1.2 **Designated liaison persons (DLP):** with responsibility to liaise with statutory agencies regarding child protection and welfare concerns. The designated liaison person will be the resource person to all staff and volunteers who have a child protection concern. It is important that the DLP is accessible to staff. When concerns relating to child protection arise outside the DLP's working hours, the On Call Manager then acts as the DLP until such time as the DLP comes back on duty. The DLP for NOVAS is the Manager of the service, See Appendix 1 for full list of duties of a DLP and Deputy DLP.

- 4.1.3 **A designated deputy liaison person:** with delegated responsibilities when the designated liaison person is unavailable. The Deputy DLP for NOVAS is the duty Team Leader reporting to the service manager.
- 4.1.4 **Mandated Persons:** All managers of homeless services are mandated persons from the moment of employment under the Children’s First Act 2015. *“Mandated persons are people who have contact with children and/or families who, by virtue of their qualifications, training and experience, are in a key position to help protect children from harm.”* (Children First Act, 2015). Mandated Persons have a statutory obligation to report child protection concerns which reach or exceed the legally defined threshold of harm, and to cooperate with Tusla in the assessment of mandated reports, where requested to do so. *“The threshold of harm, at which you must report to Tusla under the Children First Act 2015, is reached when you know, believe or have reasonable grounds to suspect that a child has been, is being, or is at risk of being ill-treated to the point where the child’s health, development or welfare have been or are being seriously affected, or are likely to be seriously affected.”* (Children First Act, 2015). In addition mandated persons must cooperate with any investigations that arise. Mandated persons cannot discharge their reporting responsibilities to another person. See the NOVAS Child Protection portal on Salesforce for a full list of all mandated persons.
- 4.2 A Relevant Service is defined as a service where children reside. **Bellevue House** and the **Ennis Family Hub** are designated Relevant Services. The name of the Relevant Person, appointed by NOVAS, as the first point of contact in respect of child safeguarding concerns is recorded on our Safeguarding Statements which are on display in each relevant service.
- 4.3 For names and contact numbers of the persons in the roles set out in section 4 please see the NOVAS Child Protection Portal on Salesforce.

5 Tusla Definitions

- 5.1 **Child Safeguarding** – ensuring safe practice and appropriate responses by staff and volunteers to concerns about the safety or welfare of children, should these arise. Child safeguarding is about protecting the child from harm, promoting their welfare and in doing so creating an environment which enables children and young people to grow, develop and achieve their full potential.
- 5.2 **Child or young person** – a person under the age of 18 years.
- 5.3 **Child Protection** and Welfare Report Form – form for use in reporting suspected or alleged abuse or welfare concerns to Tusla (available at www.tusla.ie).
- 5.4 **Designated Liaison Person (DLP)** – a resource to any staff member who has a child protection concern. DLPs are responsible for ensuring that reporting procedures are followed correctly and promptly and act as a liaison person with other agencies (see Children First: National Guidance).
- 5.5 **Mandated person** – as defined in the Children First Act 2015, mandated persons have a statutory obligation to report concerns that meet or exceed a particular threshold to Tusla and to cooperate with Tusla in the assessment of mandated reports, when requested to do so.
- 5.6 **Named person** – a person appointed by an organisation to lead the development of guiding principles and child safeguarding procedures and for ensuring that policies and procedures are consistent with best practice as detailed in this Guide.
- 5.7 **Retrospective Abuse Report Form (RARF)** – form for use in reporting to Tusla suspected or alleged retrospective abuse or welfare concerns, on adults who allege childhood abuse (available at www.tusla.ie).
- 5.8 **Relevant person** – as defined in the Children First Act 2015, ‘means a person who is appointed by a provider of a relevant service to be the first point of contact in respect of the provider’s Child Safeguarding Statement’.
- 5.9 **Relevant service** – as defined in the Children First Act 2015, ‘means any work or activity specified in Schedule 1 [of that Act]’.

- 5.10 **Unaccompanied Minor** – An unaccompanied person under the age of 18 seeking international protection. (*Section 14 International Protection Act 2015*).
- 5.11 **Worker and volunteer** – among other things, any staff, volunteer, member of any board of management or student engaged in an organisation to provide services to children or families.

6 Description of our services

- 6.1 NOVAS provides the following services to children or young people:
- 6.1.1 **Bellevue House:** is a six-bed residential service for unaccompanied minors from outside the EU, seeking asylum. It is a long-term specialised children's service, catering for minors between the ages of twelve and eighteen.
- 6.1.2 **Ennis Family Hub:** provides supported temporary accommodation for five families who are experiencing homelessness.
- 6.2 NOVAS also runs Tenancy Sustainment, Housing Led, Social Housing, Supported Temporary Accommodation, Outreach Services, and Addiction Services.

7 Reasonable Grounds for Concern

- 7.1 The primary objective when submitting or raising a concern with Tusla is the welfare and safety of the child. Tusla has statutory responsibility for the protection and welfare of children, and An Garda Síochána has responsibility for investigating any suspected criminal activity. Staff play a vital role in reporting by supporting the child through the process and co-operating fully with any investigation or inquiries. The responsibility to report child protection or welfare concerns applies to everyone working with children or family members.
- 7.2 Children First: National Guidance for the Protection and Welfare of Children defines four categories of abuse; neglect, emotional abuse, physical abuse, and sexual abuse.
- 7.2.1 **Neglect** can be defined in terms of an omission, where the child suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, medical care, attachment to and affection from adults.

- 7.2.2 **Emotional abuse** is usually found in the relationship between a caregiver and a child rather than in a specific event or pattern of events. It occurs when a child'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.
- 7.2.3 **Physical abuse** is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a child.
- 7.2.4 **Sexual abuse** occurs when a person uses a child for his or her gratification or sexual arousal or for that of others.
- 7.3 **Identifying reasonable grounds for concern:** Tusla should always be informed when there are reasonable grounds that a child or young adult has been harmed, is being harmed, or is at risk of being harmed. Children First: National Guidance for the Protection and Welfare of Children lists the following as reasonable grounds for concern:
- 7.3.1 Evidence, for example an injury or behaviour, that is consistent with abuse and is unlikely to have been caused in any other way;
- 7.3.2 Any concern about possible sexual abuse;
- 7.3.3 Consistent signs that a child is suffering from emotional or physical neglect;
- 7.3.4 A child saying or indicating by other means that he or she has been abused;
- 7.3.5 Admission or indication by an adult or a child of an alleged abuse they committed;
- 7.3.6 An account from a person who saw a child being abused.
- 7.4 Wherever appropriate, any issues should be checked with the parents or guardians when considering whether a concern exists, unless doing so may further endanger the child or the person considering making the report.
- 7.5 Abuse is not always committed through personal contact with a child or young person, sometimes it is perpetrated through social media or the use of information and communication technology. Internet and Online Safety must be considered in relation to keeping children and young people safe in all safeguarding procedures.

Please refer to procedures outlined in CS08 Your Safety Policy for further information.

8 Receiving a report of concern

- 8.1 All workers and volunteers (including students on placement or work experience) have a responsibility to safeguard children and young people and to report any concerns they may have for the protection or welfare of a child or young person. All students on placement with NOVAS will be over 18 years of age.
- 8.2 Regardless of how a concern comes to a staff member or volunteer's attention, it should be reported to the Designated Liaison Person or deputy directly or via the service manager.
- 8.3 The Designated Liaison Person, in consultation with the person who raised the concern, will decide if reasonable grounds for concern exist. If reasonable grounds for concern exist, the Designated Liaison Person will report to Tusla through either the Tusla Web Portal or relevant Dedicated Contact Point. If the DLP decides not to make a report, the staff member or volunteer with the reasonable concern is still entitled to make a report to Tusla under Children First: National Guidance for the Protection and Welfare of Children, should they wish to do so. In reporting to Tusla, the individual person has protections under the Protections for Persons Reporting Child Abuse Act 1998, should they report independently.
- 8.4 Under the Children First Act, 2015, managers of homeless services are designated as Mandated Persons and are required to report suspicion or knowledge of abuse. The Designated Liaison Person will be informed of all safeguarding concerns. It is the Mandated Person's responsibility to report concerns that emanate out of the service they manage.
- 8.5 **Allegations of abuse by a child:** Where the person allegedly causing harm to a child is another child (peer abuse), reports should be made to Tusla for both children.
- 8.6 **Allegations of abuse that occurred outside of Ireland:** Where a child or young person discloses abuse that occurred outside of Ireland, the above reporting

procedures in section 9 below apply. A report should also be made to An Garda Síochána.

- 8.7 **Responding to adults who disclose retrospective childhood abuse:** Where such a disclosure is made it is essential to establish whether there may be current risk to any child or young person who may be in contact with the person subject to an abuse allegation (PSAA) revealed in the disclosure. This is important even where the children or young people about whom there may be a concern are still to be identified. The reporting procedures in section 9 below apply when responding to adults who disclose childhood abuse.

9 Process for managing a concern

- 9.1 **Who to pass the concerns to:** Where a NOVAS staff member has a child protection or welfare concern that places the child at risk of harm, they should immediately consult with their line manager who is a Mandated Person or the Designated Liaison Person. If the manager is unavailable, they should contact the manager on call.
- 9.2 **Immediate risk to the child:** If a child is deemed to be at immediate risk or is suffering from a serious injury, medical attention should be sought immediately from the nearest Emergency Department. The Duty Social Worker, An Garda Síochána and Duty Consultant, must be informed. No child should be left in a situation which exposes him or her to harm. If the concern is urgent, contact should be made with the duty social worker by telephone, promptly followed by the mandatory Child Protection and Welfare Report Form, (CPWRF) which must be completed and submitted.
- 9.3 **Mandated Persons:** It is the Mandated Person's responsibility to decide if the threshold of harm, as defined in section 7.2 of this policy and the Act, has been reached. The Mandated Person should consult with the Designated Liaison Person.
- 9.4 **Tusla Dedicated Contact Point:** If the Designated Liaison Person and Mandated Person is unsure if that threshold has been reached, they should discuss their concern with the Tusla Dedicated Contact Point in the young person's area. To find

details of who to contact to discuss your concern go to the Tusla website, www.tusla.ie/children-first/contact-a-social-worker3

9.5 **Out of hours Social Work Service:** Mandated persons can access Tusla's emergency out-of-hours social work service, contact the out-of-hours social work service on 0818 776 315 between 6pm and 6am every night and between 9am and 5pm on Saturdays, Sundays and bank holidays. For non-mandated persons, in an emergency, contact The Garda Síochána or emergency services as required.

9.6 **Tusla Web Portal:** A web portal has been developed to allow Mandated Persons to securely submit Child Protection and Welfare Report Forms to Tusla. To use the portal, you will need to create an account. You can print off a copy of the report you submit via the portal for your records. The web portal can be accessed to create an account or make a report through the Tusla website, www.tusla.ie/children-first/web-portal The Tusla Web Portal is Tusla's preferred pathway for receiving child protection or welfare concerns and retrospective abuse reports.

9.7 **Child Protection and Welfare Report Form or Retrospective Abuse Report Form:** As an alternative to the Tusla Web Portal, the DLP or mandated persons can complete the Child Protection and Welfare Report Form or the Retrospective Abuse Report Form and forward it to the Tusla Duty Social Worker through the relevant Dedicated Contact Point. Where mandated persons are making a report under the Children First Act 2015 they can make a joint report with their DLP. Reports to Tusla should be made without delay. The Retrospective Abuse Report (RAR) form is available here www.tusla.ie/uploads/content/Retrospective_Abuse_Report_Form_FINAL.pdf and the Child Protection and Welfare Report (CPWR) form is available here www.tusla.ie/uploads/content/Child_Protection_and_Welfare_Report_Form_FINAL.pdf

9.8 **Reporting Allegations of abuse made against workers or volunteers**

9.8.1 The safety of the child is paramount, and steps should be taken to ensure the child is not exposed to further risk. Staff play an integral part in promoting the safety and wellbeing of the children who use and come into contact with NOVAS services. The NOVAS HR01 Code of Conduct sets a standard of

behaviour and boundaries that the organisation expects all staff and volunteers to adhere to.

9.8.2 It is imperative to create an open and transparent culture where staff feel comfortable to report concerns about another staff member. Where an allegation is made against a staff member or volunteer, the organisation has a dual responsibility in respect of both the child and the staff member or volunteer.

9.8.3 A concern about a staff member or volunteer may arise in several ways:

- Behaviour that is contrary to the NOVAS HR01 Code of Conduct
- A breach of professional standards or code of ethics
- Suspected or witnessed abuse
- A concern may arise through the complaint procedure

9.8.4 All concerns should be reported to the designated liaison person or a senior manager. Where a worker or volunteer is of the opinion that the organisation has not given the complaint due regard or feels nervous or worried about using the internal procedure, they should contact Tusla or An Garda Siochana directly.

9.8.5 If the DLP or senior manager considers that there is a child protection concern, they will follow the standard reporting procedure and the steps outlined in this section. If the matter does not meet reasonable grounds to be considered abuse, it may still need to be addressed through internal HR procedures; this may arise when staff members or volunteers conduct is deemed to be poor practice rather than abusive behaviour.

9.9 Procedure for managing allegations of abuse against employees

9.9.1 The priorities are to ensure that no child is exposed to unnecessary risk and that no staff member is denied their rights under employment law.

9.9.2 As a matter of urgency, NOVAS will consider, and where appropriate, take, any protective measures deemed necessary to ensure the child is protected. This could involve placing the employee off duty on pay or other comparable action

while the allegation is being considered or investigated. These measures will be proportionate to the level of risk and will not unreasonably penalise the employee, financially or otherwise, unless necessary to protect children.

- 9.9.3 Any steps undertaken will be in accordance with NOVAS HR14 Disciplinary Policy or ORG13 Complaints Policy and carried out privately, further the staff member, or volunteer should be informed of the nature of the allegation and be allowed to respond. All those involved in the process will be afforded fairness, support, and confidentiality throughout all stages of the process.
- 9.9.4 If criminal proceedings are undertaken and the person who the allegations have been made against is found innocent, the organisation may need to consider whether internal disciplinary procedures for misconduct should be instigated. See policies and procedures in the staff handbook.

10 Talking to Parent(s) & Guardians

- 10.1 Guardians or parents should be informed of any planned action, or when a report of a concern about a child is being made to Tusla. This should be done with due consideration to the confidentiality rights of the person against whom the allegation has been made. However, Guardians or parents do not need to be informed that a report is being made to Tusla if doing so would put the child at further risk, or if the family's knowledge of the report could impair Tusla's ability to carry out an assessment. Also, it is not necessary to inform the family if the person making the report reasonably believes it may place them at risk of harm from the family.

11 Record Keeping

- 11.1 It is important that information about concerns for the welfare or protection of a child or young person is gathered early and shared as soon as possible with the appropriate person within the organisation. This can facilitate early warning signs being picked up and interventions being put in place at the earliest opportunity.
- 11.2 All records should be factual and include details of contacts, consultations and any actions taken. NOVAS will cooperate in the sharing of records with Tusla where a child protection or welfare issue arises. Records should only be used for the purpose

for which they are intended. Records should only be shared on a need-to-know basis in the best interests of the child or young person. NOVAS will, as per the NOVAS ORG06 Data Protection Policy, store records for two years, unless otherwise stated. Files for children in care will be transferred to Tusla when the child or young person leaves the service.

- 11.3 **NOVAS Child Protection Portal.** All Child Protection and Welfare Report forms, whether submitted through the Tusla Web Portal or through the Tusla Duty Social worker through the relevant Dedicated Contact Point are uploaded and are securely stored on Salesforce: NOVAS Child Protection Portal. This Portal will contain the Child Protection Register, links to the Tusla Portal, NOVAS Child Protection Policy, Safeguarding roles and list of mandated persons. The Child Protection Register will record details of the concerns and the decisions and actions taken regarding the child protection and welfare concern.
- 11.4 **Confidentiality:** Sharing safeguarding information and concerns with Tusla or An Gardaí Siochana is not a breach of confidentiality or data protection laws. However, the information should be shared on a need to know basis and be cognisant of what is in the best interest of the child. Parents, guardians, and children have a right to know if the information is being shared unless it puts the child or the reporter at risk of harm.

12 Staff recruitment and induction

- 12.1 The organisation will take all reasonable measures to ensure all staff are suitable and suitably trained to work with young people. The organisation will adhere to this by engaging in good recruitment practices: Recruitment and selection procedures, Garda Vetting, References, Induction, Probation, Regular Supervision and ongoing staff training and development.
- 12.2 The organisation commits to having clear and concise job descriptions that clearly outline the duties, responsibilities, and requirements for the roles. Further, all roles will have person specifications that describe the qualifications, skills, and personal attributes that the organisation requires.

- 12.3 The organisation has procedures in place to ensure relevant staff are Garda vetted. Please refer to the organisation HR02 Recruitment & Selection Policy for further details.

13 Child safeguarding training strategy

- 13.1 All staff and volunteers will complete the Tusla Children's First e-learning module before employment in services commences.
- 13.2 Child safeguarding training required within the organisation: Staff Induction to related Organisational Policies, Online Introduction to TUSLA Children's First module and refresher training, and Designated Liaison Person (DLP) Training.
- 13.3 The Project Manager and the Head of Operations will conduct regular training needs analysis of staff and volunteer needs. Children's Services will conduct this review on a quarterly basis.
- 13.4 Child safeguarding training is accessed, delivered, monitored and evaluated within NOVAS by:
- 13.4.1 The use of induction training to introduce new workers or volunteers to the organisation's guiding principles and child safeguarding procedures;
 - 13.4.2 In-house training will be used to ensure workers and volunteers are familiar with the organisation's guiding principles and child safeguarding procedures;
 - 13.4.3 Child safeguarding training, appropriate to the specific roles and responsibilities of various staff members, will be provided or sourced;
 - 13.4.4 Mandated persons will be provided with specific training in relation to their statutory responsibilities under the Children First Act 2015;
 - 13.4.5 Specific training for those with additional responsibilities, such as DLPs or Deputy DLPs or members of management committees will be provided or sourced;
 - 13.4.6 NOVAS will provide or source appropriate child safeguarding refresher training for all workers;
 - 13.4.7 The NOVAS training strategy will be resourced by dedicating an annual training budget in each project to include all Child Protection Training.
- 13.5 Training records: NOVAS records all training on Salesforce under individual staff HR profiles.

14 Working safely with children and young people

- 14.1 The organisation endeavours to operate safe, effective, and quality driven services at all times and is fully compliant with all aspects of the Safety, Health, and Welfare Act 2005. Further, the organisation has robust mechanisms in place that can report, monitor, and learn from any occurrence that may put staff, clients or tenants at risk.
- 14.2 **Safe supervision of children:** Only staff in designated services have the permission to work with children and young adults on a one to one basis.
- 14.3 When staff are working directly with young people service managers will ensure that the appropriate staff to child ratios are in place to supervise activities. All staff will ensure that children are never left unattended and will ensure that all activities are carried out in a transparent manner and in public view. Staff will avoid one to one activities that may put the child or themselves in a vulnerable position, for example, cinema trips.
- 14.4 Staff who are supervising children on an activity must ensure that they know where the children are at all times and must be contactable throughout the event. Further, staff will have the full consent of the parent or guardian and be clear about what the activity is and the expected duration.
- 14.5 In an event where transportation is needed, staff should either use a company vehicle or public transport or in a vehicle that is driven by a fully licensed driver, is insured, indemnified, and has current NCT and tax.
- 14.6 **Online Safety (Photography, video and social media):** Social media has become an intrinsic part of modern day society. Many social media sites can share personal information that is quickly disseminated to a broader audience. Staff are not permitted to connect with or share content through their social media profiles or any digital personal data with any children using NOVAS services.
- 14.7 Staff are not permitted to photograph or video children or young adults unless the child and parent or guardian give written consent to do so. The purpose should be clearly stated, (for example publications, organisation promotions or project

brochures), ethical and transparent and should not be misused to cause harm to the child or young adult.

- 14.8 Staff should ensure that their social media and personal data are secured and unable to be accessed if a device is misplaced or lost. Personnel should also refrain from using social media in the presence of children or young adults.
- 14.9 Please see the NOVAS Children's Services CSO8 Your Safety Policy for further details on how to identify and manage risks associated with online safety.

15 Oversight and Governance

- 15.1 This NOVAS ORG08 Child Protection **Policy** and our NOVAS Child Protection **Safeguarding Statement** will be reviewed for update and revision every 2 years as a maximum in relation to any changes in legislation, best practice or national policy.
- 15.2 The NOVAS **Child Protection Portal** is used to track and record concerns relating to child safeguarding.
- 15.3 **Mandated Persons**, with support from DLP's are responsible for keeping the Portal up to date and following through on actions.
- 15.4 Each Children's Service maintains a **Service Child Protection Governance Group** that meets quarterly to monitor and review the following;
- Collation and analysis of any complaints;
 - Review of Significant Event Notifications;
 - Collation of child protection concerns and the actions taken;
 - Collation of feedback from children and young people, parents or guardians;
 - Analysis of practice and any breaches of procedures, codes of behaviour, etc.;
 - Review of and health & safety concerns;
 - Staffing, recruitment, retention, training and ratios issues are reviewed;
 - Review findings of internal quality audits or external quality inspections.
- 15.5 NOVAS has a **Child Safeguarding Working Group** who are responsible for oversight of child safeguarding issues within NOVAS. The oversight group consists of the Head of Quality, Safety & Compliance, Head of Operations, The Designated Liaison Person and The DLP deputy. This group will be automatically notified by email when a new

report is created on the Salesforce Child Protection Register. The chair of this working group is the Head of Quality, Risk and Compliance.

- 15.6 The oversight group will meet quarterly to review the register. This group are responsible for oversight of the register and recorded actions and outcomes. Mandated persons may be consulted in this process.
- 15.7 The Head of Quality, Risk and Compliance will submit a quarterly report to the **Governance Sub Committee** of the NOVAS board of directors, for oversight and governance of the management of child safeguarding concerns.
- 15.8 At **Board Meetings** the CEO, will include a summary of actions relating to child safeguarding in the Board report and provide details to the board members in meetings as required.
- 15.9 Concerns which do not initially meet reasonable grounds for concern may, upon review, show patterns or clusters which may heighten the level of concern.
- 15.10 If a staff member raises a concern and the Mandated Person and Designated Liaison Worker decide **not** to report to TUSLA the following steps should be taken:
 - 15.10.1 The reasons for not reporting are to be recorded on Salesforce: Child Protection Portal;
 - 15.10.2 All actions undertaken as a result of the concerns are to be recorded;
 - 15.10.3 The worker or volunteer who raised the matter should be given a clear written explanation of why the concern wasn't reported to TUSLA;
 - 15.10.4 The worker or volunteer will be advised that if they remain concerned, they are free to report to TUSLA or An Garda Síochána;
 - 15.10.5 The worker or volunteer will be notified that they are covered by, the Protections for Persons Reporting Child Abuse Act 1998.

16 Disseminating this policy and procedure

- 16.1 All parents or guardians, children, staff, and volunteers who engage with the organisation should be made aware of this NOVAS ORG08 Child Protection Policy.
- 16.2 When communicating with parents or guardians and children staff should be mindful of possible literacy issues, language barriers, and communication differences.

- 16.3 All new staff and volunteers will be informed of this policy and procedure, and they will complete the Tusla Introduction to Children's First online training module as part of their induction.
- 16.4 Managers will disseminate this NOVAS ORG08 Child Protection Policy in team meetings and will also insure that any future amendments or updates will also be communicated in team meetings.
- 16.5 The organisation safe guarding statement will be displayed in each service and will identify the name of the project and the mandated person for reporting.

17 Appendix 1: Roles of Designated Liaison Person (DLP) and Deputy

The DLP will;

- Be fully familiar with our responsibilities in relation to safeguarding of children.
- Have good knowledge of our guiding principles and child safeguarding procedures.
- Ensure that NOVAS's reporting procedure is followed, so that child protection and welfare concerns are referred promptly to Tusla.
- Receive child protection and welfare concerns from workers and volunteers and consider if reasonable grounds for reporting to Tusla exist.
- Consult informally with a Tusla Duty Social Worker through the Dedicated Contact Point, if necessary.
- Where appropriate, make a formal report of a child protection or welfare concern to Tusla on behalf of NOVAS, using the Tusla Web Portal or the Tusla Child Protection and Welfare Report Form.
- Inform the child's parents or guardians that a report is to be submitted to Tusla or An Garda Síochána, unless:
 - Informing the parents or guardians is likely to endanger the child or young person;
 - Informing the parents or guardians may place you as the reporter at risk of harm from the family;
 - The family's knowledge of the report could impair Tusla's ability to carry out an assessment.
- Record all child protection or welfare concerns, or allegations of child abuse submitted, as well as any actions taken in response to these concerns.
- Provide feedback to the concern referrer, as appropriate.
- Ensure that a secure system is used to manage and store confidential records.
- Act as a liaison with Tusla and An Garda Síochána, as appropriate.
- Where appropriate, jointly report with a mandated person.