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Child Protection Policy

Momentum Marketing Services

2026 to 2028

Policy period	June 2026 to June 2028
Approved on	05 June 2026
Next review	05 June 2028, or sooner where law, guidance or our activities change
Approved by	Orla Casey, Managing Director
Designated Liaison Person	Grace Roche
Deputy DLP	Lola Gonzalez
Replaces	Child Protection Policy approved on 05 June 2024

Momentum Marketing Services is committed to ensuring the safety and wellbeing of all children and young people who participate in our activities, services, and platforms. This policy has been developed in accordance with the Keeping Children Safe Child Safeguarding Standards as outlined in the report "Child safeguarding standards and how to implement them" by the European Commission. Our policy follows the four key areas of child safeguarding: policy, people, procedures, and accountability, to ensure a comprehensive and effective approach to child protection.

Momentum develops and delivers EU funded education projects. Our contact with children and young people arises mainly through youth and education projects, workshops, events, research activities and online learning platforms. This policy covers all of that work, in person and online, in Ireland and during project activities in other countries.

The purpose of this policy is to:

- Ensure the safety and wellbeing of children and young people in our care.
- Provide guidance to staff, contractors, and volunteers on recognising and responding to child protection concerns.
- Outline procedures for reporting and responding to child protection concerns.
- Set out how we recruit, train and support the people who work on our behalf.

This policy is informed by the following legislation and guidelines:

- Children First Act 2015 (Ireland), as amended
- Children First: National Guidance for the Protection and Welfare of Children (2017)
- Addendum to the National Guidance: Online Safety (2019)
- Addendum to the National Guidance: Dealing with Adult Retrospective Disclosures of Childhood Abuse (2025)
- Tusla, Child Safeguarding: A Guide for Policy, Procedure and Practice
- National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016
- Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012
- Protections for Persons Reporting Child Abuse Act 1998
- Protected Disclosures Act 2014, as amended in 2022
- General Data Protection Regulation (GDPR) and Data Protection Act 2018
- UN Convention on the Rights of the Child
- EU Strategy on the Rights of the Child (2021)

- Commission Recommendation (EU) 2024/1238 on integrated child protection systems
- European Commission Child Safeguarding Standards (2022)

This policy applies to all employees, contractors, volunteers, and any individual working on behalf of Momentum Marketing Services. Partner organisations and subcontractors who work with children on a Momentum activity are asked to confirm that they follow this policy or hold an equivalent policy of their own.

Definitions

- **Child:** Any person under the age of 18 years.
- **Child Safeguarding:** The steps an organisation takes to keep every child safe from harm while taking part in its activities.
- **Child Protection:** The process of protecting individual children identified as either suffering, or at risk of suffering, significant harm as a result of abuse or neglect.
- **Abuse:** Children First describes four categories: neglect, emotional abuse, physical abuse and sexual abuse. Abuse can happen in person or online, and a child may experience more than one category at the same time.
- **Reasonable Grounds for Concern:** Information, an observation or a disclosure that gives a person good reason to believe a child may have been harmed, is being harmed, or is at risk of harm.
- **Mandated Person:** A person legally required under the Children First Act to report child protection concerns above a defined threshold to Tusla.
- **Designated Liaison Person (DLP):** The person in Momentum who receives child protection concerns and liaises with Tusla and An Garda Síochána.
- **Retrospective Disclosure:** A disclosure by an adult of abuse they experienced as a child.

Policy Statement

Momentum is committed to

- **Providing a safe and nurturing environment for all children and young people.** We ensure that our programmes and activities create a positive and supportive atmosphere where children feel valued, respected, and protected. Our venues and online platforms are planned as safe spaces where every child is protected from abuse and neglect.
- **Taking all necessary steps to protect children from harm.** We have clear systems in place to prevent, identify, and respond to potential risks to children. These include safe recruitment and Garda vetting for relevant roles, risk assessment of each activity involving children, and online safety measures. We also engage with children and young people so that they feel able to recognise and report any concerns they may have.
- **Ensuring that all staff are aware of their responsibilities in relation to child protection.** We provide ongoing training so that all staff, contractors, and volunteers understand their role in recognising, responding to, and reporting concerns. This includes recognising signs of abuse and understanding the legal and organisational procedures for reporting. We foster a culture of openness, accountability, and vigilance.

Responsibilities

- **Management:** Management is responsible for the implementation and regular review of this policy. This involves ensuring that all procedures and guidelines are up to date, effective, and aligned with current legislation and best practice. Management allocates resources for training, keeps clear reporting lines in place, and reviews safeguarding practice each year to identify areas for improvement.
- **Staff and Volunteers:** All staff and volunteers adhere to this policy and take part in child protection training, including the Children First e-learning programme. They keep informed of updates to the policy, maintain professional boundaries, respect children's rights, and report any risk or concern through the procedures set out below.
- **Designated Liaison Person (DLP):** The DLP is the first point of contact for safeguarding concerns within the organisation. The DLP receives reports of concern, documents them accurately, and takes appropriate action,

which may include referral to Tusla or An Garda Síochána. The DLP keeps the welfare of the child as the priority, shares information on a need to know basis, and supports and advises staff on child protection matters.

- **Deputy DLP:** The Deputy DLP carries out the DLP role whenever the DLP is unavailable, so that a trained contact is always in place.
- **Mandated Persons:** Any team member who is a mandated person under Schedule 2 of the Children First Act holds a personal legal duty to report harm above the threshold to Tusla. The DLP supports them in making that report.

Key Contacts

Role	Name	Contact
Designated Liaison Person	Grace Roche	086 828 1355 | grace@momentumconsulting.ie
Deputy DLP	Lola Gonzalez	086 011 3424 | lola@momentumconsulting.ie
Tusla, Child and Family Agency	Duty social worker for the area where the child lives	Web portal: portal.tusla.ie | Local office details: www.tusla.ie
An Garda Síochána	Emergency or immediate risk to a child	999 or 112, or the local Garda station

Safe Recruitment and Garda Vetting

- Roles that involve access to or contact with children are identified before recruitment, and the role description states the safeguarding responsibilities attached.
- References are taken up and identity and qualifications are checked for every appointment.
- Garda vetting through the National Vetting Bureau is completed before a person begins relevant work with children, as required by the National Vetting Bureau Acts 2012 to 2016. Vetting is renewed in line with good practice.
- Every new staff member, contractor and volunteer receives this policy at induction and confirms in writing that they have read and understood it.

Code of Conduct

All staff, contractors, and volunteers are expected to:

- **Treat all children with respect and dignity.** All interactions with children respect their rights, privacy, and dignity. Staff, contractors, and volunteers listen to children, value their perspectives, and respond to their needs in a caring way.
- **Ensure that interactions with children are appropriate and professional.** Maintain professional boundaries at all times. This includes being mindful of physical contact, language, and the sharing of personal information.
- **Work in open and visible settings.** Plan activities so that two adults are present. Where one to one contact with a child is necessary, it takes place in an open environment where others are present or can observe.
- **Use official channels for contact.** Communicate with children through project channels agreed with parents or guardians, such as project email addresses and supervised platforms. Personal phone numbers and personal social media accounts stay separate from project work.
- **Seek consent for photographs and recordings.** Images, video and audio of children are taken and published with the informed consent of the child and their parent or guardian, and are stored on Momentum systems.
- **Report any concerns or suspicions of abuse immediately.** Any concern about abuse, neglect, or the welfare of a child is reported to the DLP without delay so that the right action can be taken to protect the child.

Online Safety

Many Momentum activities take place on websites, learning platforms, video calls and social media. In line with the 2019 Online Safety addendum to the National Guidance, online risks are included in our risk assessment and in our Child Safeguarding Statement.

- Online sessions involving children are hosted on Momentum or partner accounts, with two adults present and access limited to registered participants.
- Parent or guardian consent is in place before a child joins an online activity or platform, and before any session is recorded.
- Discussion spaces, comment areas and shared content open to children are moderated, and harmful content or contact is removed and reported to the DLP.
- Children and parents are told how to raise a concern about anything that happens online during a Momentum activity.

Procedures for Reporting Concerns

- **Step 1: Immediate Safety.** Where a child appears to be at immediate and serious risk, contact An Garda Síochána on 999 or 112, then inform the DLP.
- **Step 2: Immediate Reporting.** Any concern regarding the safety or wellbeing of a child is reported to the DLP on the same day. Prompt reporting ensures timely and effective intervention.
- **Step 3: Documentation.** The person raising the concern writes down what they saw or heard, using the child's own words where possible, with dates and times. The DLP documents the concern in detail, including observations and actions taken.
- **Step 4: Action.** The DLP considers whether there are reasonable grounds for concern and may consult the Tusla duty social worker for advice. Where reasonable grounds exist, the DLP reports to Tusla without delay using the Tusla Web Portal (portal.tusla.ie) or the Child Protection and Welfare Report Form.
- **Step 5: Informing Parents or Guardians.** Parents or guardians are told that a report is being made, except where telling them could place the child at further risk.
- **Step 6: Feedback and Support.** The DLP tells the person who raised the concern what action was taken. Where the DLP decides that a report to Tusla is unnecessary, the reasons are recorded and explained, and the person who raised the concern remains free to report directly to Tusla. Support is offered to staff and children as needed.

When a child tells you about harm

- Stay calm, listen carefully and take what the child says seriously.
- Let the child speak in their own words and at their own pace, and keep any questions open and brief.
- Explain that you will share what they have said with the person in Momentum whose job is to help keep children safe.
- Write down what was said as soon as possible and pass it to the DLP on the same day.

Retrospective Disclosures

An adult may tell a member of the team about abuse they experienced as a child. This section follows the 2025 addendum to the National Guidance, Dealing with Adult Retrospective Disclosures of Childhood Abuse.

- The staff member listens with care, explains the limits of confidentiality, and informs the DLP.
- The DLP considers whether any child may be at risk now, for example where the person named may still have contact with children.
- Where a current risk to a child may exist, the DLP reports to Tusla using the Retrospective Abuse Report Form on the Tusla Web Portal. Where the position is unclear, the DLP consults the Tusla duty social worker.
- The adult is given information on support, including the HSE National Counselling Service, and on their option to report to An Garda Síochána.

Allegations Against Staff, Contractors or Volunteers

Where a concern is raised about a person working on behalf of Momentum, two procedures run side by side.

- **Reporting:** The DLP follows the reporting procedure above and reports to Tusla where reasonable grounds for concern exist.
- **Internal procedure:** The Managing Director manages the employment or contract matter, applying fair procedures and taking any protective measures needed while the matter is examined. These measures are precautionary and carry no judgement on the outcome.
- A concern about the DLP is brought directly to the Managing Director. A concern about the Managing Director is brought to the DLP, who reports directly to Tusla.

Working with Partners and Transnational Activities

- Before any project activity involving children, Momentum and the host partner agree a named safeguarding contact, supervision arrangements and the reporting route under the national law of the host country.
- Written parent or guardian consent, emergency contact details and any support needs are collected before a child takes part in an event, mobility or residential activity.
- A concern arising abroad is reported to the host safeguarding contact and to the Momentum DLP on the same day.

Confidentiality and Data Protection

- Confidentiality is maintained as far as possible to protect the privacy of all parties involved. The welfare of the child always takes precedence over confidentiality. Information is shared only with those who need to know in order to protect the child.
- All records relating to child protection concerns are kept securely and confidentially.
- Records are maintained in accordance with GDPR and the Data Protection Act 2018.

Training

All staff, contractors, and volunteers will receive training on:

- The Children First e-Learning Programme (https://www.tusla.ie/children-first/children-first-e-learning-programme/), with the completion certificate kept on file
- Recognising signs of abuse and neglect.
- Understanding the procedures for reporting concerns, including retrospective disclosures.
- Online safety in project activities.
- Their responsibilities under this policy and relevant legislation.
- Annual refresher sessions.

The DLP and Deputy DLP complete additional training for their role.

Whistleblowing and Protection

Momentum encourages staff and volunteers to speak up about concerns. We ensure:

- Those who report concerns in good faith are supported and protected.
- Anyone raising a legitimate concern is protected from adverse treatment, in line with the Protected Disclosures Act 2014 and the Protections for Persons Reporting Child Abuse Act 1998.

Record Keeping

- All reports, concerns, and follow-up actions are recorded securely, including concerns where the decision was to monitor and keep under review.
- Access is restricted to the DLP and relevant authorised personnel only.

- Records are stored in line with GDPR requirements.

Child Safeguarding Statement

In accordance with Section 11 of the Children First Act, a **Child Safeguarding Statement** has been developed and is publicly available. It includes a written risk assessment, covers online safety, and outlines the procedures in place to manage potential harm to children using our services. The Statement is displayed in our office, provided to staff, and given to parents, guardians, Tusla and members of the public on request. It is reviewed at least every 24 months.

Monitoring and Accountability

- Each year management checks training records, vetting records and activity risk assessments, and reviews any concerns raised and how they were handled.
- Learning from that check is shared with the team and reflected in this policy and in the Child Safeguarding Statement.

Review and Approval

This policy is reviewed **every two years**, or sooner if there are significant changes in law or practice. Feedback from staff and stakeholders is considered in each review.

- **Approved on**: 05 June 2026
- **Next Review**: 05 June 2028

Approved by:
Orla Casey
Managing Director
Momentum Marketing Services