

Child protection and safeguarding policy

Organisation wide policy

VERSION 1.0 | EFFECTIVE 20 OCTOBER 2026

POLICY OWNER DARREN BRACKEN | NEXT REVIEW 20 OCTOBER 2027

We will take every reasonable step to prevent harm arising from our people, activities, digital tools and partnerships. When a concern arises, the young person's safety comes first. Anyone may report directly to Tusla or An Garda Síochána; internal approval is never a condition of reporting.

Use this first when a concern arises

Situation	Required action
Immediate danger or urgent medical need	Call 112 or 999 in Ireland. Keep the young person with a safe adult. Outside Ireland use the local emergency route.
A disclosure or concern about a child	Listen calmly. Do not investigate or promise secrecy. Record the child's words and contact the safeguarding lead without delay. See section 5.
Lead unavailable or implicated	Go directly to Tusla or Gardaí as appropriate. Tell the host school's designated liaison person if safe. Do not send an allegation to the person it concerns.
Sexual imagery involving a child	Do not ask to see, copy, download or forward it. Record non-image identifiers and seek Garda advice. See section 7.
A disclosure during research	Stop the research interaction if necessary and use the safeguarding route. Consent forms and research deadlines never override child protection.

Policy status and scope

This policy was adopted by Waypoint on 20 October 2026 and applies across all our services. Darren Bracken, Founder and Director, is accountable for its implementation, resourcing and review. Everyone acting for Waypoint must follow its requirements and report safeguarding concerns without delay.

The policy covers all children under 18 who use or are affected by our services. Participants aged 18 and over receive the same behavioural protections, with adult consent and appropriate adult reporting routes. An adult's account of childhood abuse may still raise a current risk to children.

SECTIONS 02–04 PRINCIPLES PEOPLE AND DELIVERY
SECTIONS 05–07 REPORTING ALLEGATIONS AND DIGITAL HARMS
SECTIONS 08–10 RESEARCH RECORDS AND SAFEGUARDING STATEMENT
SECTIONS 11–14 RISK ASSESSMENT FORMS AND GOVERNANCE

02 Principles scope and responsibilities

Who and what this policy covers

This policy applies to the director, employees, freelancers, subcontractors, volunteers, trainees, visitors and associates acting for Waypoint. It covers school sessions, youth activities, online contact, research support, events, travel, media, procurement and product demonstrations. Contracts must require compliance and prompt reporting of breaches.

We treat children with dignity, listen to their views and make participation accessible. Protection must not depend on disability, ethnicity, migration status, religion, sex, sexual orientation, gender identity, care status or a child's ability to explain what happened. We assess individual needs without labelling a child as inherently vulnerable. We do not blame a child for contact, images, payment or compliance obtained through manipulation or coercion.

Safeguarding roles and responsibilities

Role	Responsibilities
Director and policy owner	Darren Bracken, Founder and Director. Accountable for implementation, resources, staffing, partner conditions and corrective action. Cannot handle an allegation against himself.

Role	Responsibilities
Designated liaison person or DLP	Darren Bracken. Receives concerns, contacts Tusla, documents decisions and coordinates support. Maintains appropriate role-specific training. Does not investigate abuse.
Deputy and independent route	The director maintains deputy cover and an independent reporting route. Named contacts and availability are communicated in the safeguarding contact sheet for each service. External statutory reporting remains available at all times.
Relevant person	Darren Bracken. First contact for the Child Safeguarding Statement. This role is distinct from DLP and mandated-person duties.
Each worker and associate	Knows this policy, stays within role, reports promptly, records accurately and challenges unsafe practice. Anyone may pause an unsafe activity.
Host organisations and delivery partners	Provide named safeguarding contacts, supervision, local referral routes and agreed responsibilities. A school handover does not remove Waypoint's reporting responsibilities.

A mandated person has personal statutory reporting duties where their role falls within the Children First Act. The director will maintain a role-based list, including an explicit nil return if none apply, and review it on each staffing change. Appointment as DLP does not itself make a person mandated. Job title or past youth-work experience must not be used as a substitute for checking current legal status. [1]

Waypoint remains accountable for its own conduct, safeguarding and data-processing obligations when working with schools, research organisations, suppliers or delivery partners. Agreements must allocate practical responsibilities clearly; they cannot transfer away statutory duties.

03 Safer recruitment training and conduct

Before a person starts child related work

- Use a written role description and safeguarding criteria. Check identity, relevant qualifications, employment history and unexplained gaps. Discuss professional boundaries and responses to disclosures at interview.

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- Obtain and verify two appropriate references, including the most recent relevant employer where available. Follow up discrepancies and ask about suitability for work with children. Obtain a safeguarding suitability declaration; a declaration alone is insufficient.
 - Identify whether the work is relevant work under vetting legislation. Where required, obtain and assess a National Vetting Bureau disclosure through an authorised route before the person starts that work. Apply appropriate overseas checks where available, without treating them as a replacement for required Irish vetting. Record the decision and restrictions. [4]
 - Require signed acceptance of this policy and code of conduct. Check freelancers, trainees, volunteers and partner personnel on the same role-based basis. Supervision does not waive a legal vetting requirement.
 - Verify checks for the director as well as other workers. Another suitable authorised person must review the director's evidence. If mandatory checks or suitable supervision are absent, the activity does not proceed.

Training and supervision

Before contact, complete Children First introductory learning or a verified equivalent, a policy briefing and a practical disclosure exercise. The DLP and deputy require additional role-specific training. Record provider, date, scope and refresher due date. Provide an annual refresher, updates after legal or service changes, and activity-specific briefings on sexual violence, AI imagery, consent and research boundaries where relevant. Supervisors review conduct, wellbeing and emerging concerns after sensitive sessions; access to support must not expose identifiable case details unnecessarily.

Required and prohibited behaviour

Use respectful, age-appropriate language; maintain visible, accountable interactions; seek the child's views; explain confidentiality limits; and report mistakes and boundary breaches. Necessary physical assistance must be proportionate, explained and recorded where appropriate, with consent where practicable.

Never engage in sexual or romantic conduct with a child, grooming, sexualised jokes, humiliation, discriminatory behaviour, physical punishment, favouritism, secret gifts or exchanges of money. Never ask a child to keep a relationship secret, use their personal accounts, reveal passwords or supply private messages or intimate images. Do not add children on personal social accounts, use disappearing messages, arrange private meetings or provide personal transport. Do not work impaired by alcohol or drugs. Peer leaders have no disciplinary or safeguarding-investigation authority.

Recognising possible harm

Be alert to neglect of basic needs or supervision; persistent rejection, threats or other emotional abuse; physical injury or punishment; and sexual contact, exposure or exploitation. Possible indicators include a disclosure, unexplained injuries, marked distress, fear of a particular person, sudden withdrawal, coercive demands or repeated boundary breaches. An indicator is not proof, and absence of visible injury does not establish safety. Consider patterns and the child's context without questioning them to test a theory. Record and use the reporting procedure; trained statutory agencies assess suspected abuse. [10]

04 Safe sessions events and partnerships

A written delivery agreement before each activity

Waypoint and the host agree the activity, ages, location, responsible adults, access needs, attendance and collection arrangements, emergency procedures, DLP and deputy contacts, and the person responsible for immediate pastoral support. Agree how concerns are reported and how receipt of a handover is confirmed. The host's current safeguarding procedures must be available. Use the stricter protective control where policies differ, while following applicable local law.

A teacher or authorised host worker remains present in school sessions. Set staffing levels through a documented assessment of group size, age, additional needs, venue and subject sensitivity; a single generic ratio is insufficient. Do not begin or continue if supervision is unsafe. Visitors sign in, wear identification and remain supervised. Manage toilets, quiet rooms and transitions so children can access privacy without isolation from safe adults.

Discussion without pressure to disclose

- Explain topics and support routes in advance. Use fictional, non-identifying scenarios and non-explicit examples. Give content notices and an alternative activity or quiet break with appropriate supervision.
- Do not ask participants to describe personal abuse in a group, name peers, identify accounts, display messages or demonstrate harmful searches. Stop identifying or sexualised discussion calmly and offer a supported private conversation in an observable space.
- Make clear that opting out, asking for help or declining research will not affect grades, workshop access or relationships with staff. Attendance at a school session is not consent to research, recording or publication.
- Agree respectful peer behaviour. Interrupt bullying, sexual harassment, discriminatory targeting, image sharing and retaliation. Support both a child harmed and a child alleged to have caused harm through separate, appropriate arrangements.

Online events and contact

Use approved organisational accounts and moderated platforms with restricted joining, controlled screen sharing, an attendance check and a second authorised adult. Disable private adult-to-child messaging and recording by default. Do not require cameras or personal social accounts. Route follow-up through the school or approved organisational channel with appropriate oversight. Explain the reporting route again at the end. Any necessary exceptional individual contact requires prior approval, an observable setting, a record and an accountable adult aware of it; emergencies are documented afterwards.

Travel and partners

Waypoint does not undertake residential or overnight activities under a routine workshop booking. Any such activity requires a separate approved plan covering accommodation, room allocation, transport, missing-child response, accessibility, medical needs and consent. Before joint delivery, check partners' policies, recruitment safeguards, reporting routes and local child-protection arrangements. A serious unmitigated gap requires postponement or suspension, even where a contractual deadline is affected.

05 Responding to disclosures and reporting concerns

The first response

Stay calm and give time to speak. Say: “You did the right thing telling me. This is not your fault. I need to tell someone who can help keep you safe. I will explain what happens next.” Do not promise secrecy, express disbelief, ask leading questions or make the child repeat their account to several adults. Ask only what is needed to establish immediate safety and the next protective step. Do not confront the alleged person responsible.

Act without delay

Step	Action
1 Make safe	For immediate danger or urgent medical need, call 112 or 999. Arrange safe supervision and medical help. Do not send the child back into a situation of suspected immediate danger.
2 Record	Write a factual, dated account as soon as possible: exact words, observations, who was present, immediate needs and action taken. Distinguish observation, quotation, third-party account and professional judgement. Do not seek proof.
3 Refer	Contact the DLP immediately or, if unavailable or implicated, the deputy or statutory agency directly. Reasonable child-protection or welfare concerns go to Tusla without delay; concerns about a possible crime also go to Gardaí as appropriate.
4 Confirm	Record recipient, time, report reference and receipt. A verbal school handover is not proof a Tusla report was made. Agree who reports and verify completion; if this cannot be established, contact Tusla yourself.
5 Support	Agree a named support adult, a safe contact plan and follow-up. Explain actions in accessible language. Review ongoing contact, harassment and retaliation risks. Continue support after a platform removes content.

Use the Tusla reporting portal or contact the relevant duty social work team. If uncertain about a threshold, seek Tusla advice without delaying protection. When Tusla is unavailable and an immediate safety concern requires intervention, contact Gardaí. Internal same-day recording and escalation are Waypoint standards, not permission to wait until the end of the day. [2]

Mandated persons must apply their own statutory threshold and reporting duties, including mandated assistance when requested. A joint report may be appropriate, but a DLP's refusal or delay does not remove the individual duty. Follow Tusla's urgent-report procedure where applicable. [3]

Normally explain a report to the parent or guardian and to the child in an age-appropriate way. Do not inform a parent where doing so could increase risk, interfere with assessment or place the reporter at risk; seek agency advice and record the reason. Consent is not a precondition to necessary child-protection reporting. If a decision is made not to report, record the facts, rationale, advice obtained, support plan and review date; tell the person raising the concern that they may report directly. Never treat an unproven concern as a knowingly false report.

06 Allegations complaints and independent escalation

Concerns about a worker partner or director

Any concern about abuse, grooming, harassment or a boundary breach by an adult acting for Waypoint is taken seriously, including apparently minor patterns. The recipient records and escalates it without screening it out to protect reputation, funding or a relationship. A concern may be raised anonymously or by a third party; limited information may affect the response but does not justify ignoring it.

Two processes remain separate: protecting and reporting the child's concern, and managing the adult's engagement or employment fairly. Protective action and agency reporting must not wait for an internal investigation. Seek Tusla or Garda advice before approaching the subject, contacting witnesses or disclosing details that may prejudice a statutory inquiry.

- Immediately assess and restrict contact where needed. Redeployment, supervised access, suspension or suspension of a contract may be proportionate protective steps; they do not establish guilt.
- Use a decision maker with no involvement in the allegation. Give the subject appropriate information and an opportunity to respond when safe and consistent with agency advice. Keep records and personnel information separate from the child's support record.

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- For an allegation against Darren Bracken or the DLP, bypass that person. Use the agreed independent recipient and report directly to statutory agencies where appropriate. A host school DLP can assist with local protection, but is not automatically Waypoint's independent investigator.
 - The director maintains an independent route for allegations involving the director or safeguarding lead and arranges an impartial person with authority to oversee interim restrictions. The reporting route and contact details must be accessible through the safeguarding contact sheet for each service. If independence cannot be secured, child-facing work must pause until safe arrangements exist.
 - Inform relevant partner safeguarding leads of necessary protective actions, sharing the minimum information. Do not circulate identifying details in general management reports, partner updates or meeting records.

Accessible complaints and protection from retaliation

Children, parents and workers may speak to any trusted worker, the school DLP, Waypoint's confirmed DLP or deputy, or Tusla and Gardaí directly. Accept oral, written and accessible-format complaints; offer an interpreter or independent support person where needed. Never require the child to confront the person complained about, obtain a parent's permission to raise a concern or first use Waypoint's process.

Waypoint's service standard is to acknowledge a non-emergency complaint within two working days, explain responsibility and next steps, and provide an update within ten working days if it remains open. These are administrative targets; urgent protection and reporting happen immediately. A different independent person handles an appeal about the process. No retaliation, exclusion, loss of opportunity or pressure to withdraw a good-faith report is permitted. Check explicitly for retaliation at follow-up.

Closure requires a recorded safety and support review, outstanding actions, responsible owners and appropriate feedback. A finding that evidence is insufficient does not itself mean the child fabricated an allegation.

07 Online harm sexual imagery and AI abuse

Assess the child's situation before the content

Online abuse can involve bullying, grooming, sexual exploitation, coercion, sextortion, stalking, impersonation, hate, doxxing, threats, financial demands or AI-generated imagery. Fabricated content can cause real harm. Assess threats, access by the alleged person responsible, physical location, ongoing contact, school exposure and urgent medical or emotional support needs. A credible risk of self-harm or immediate injury requires emergency assessment and safe adult supervision; staff must not attempt clinical assessment beyond their competence.

Sexual imagery or suspected child sexual abuse material

- Do not request, search for, generate, show, download, screenshot, copy or forward sexual imagery involving a child. Do not ask the child to send it to a teacher, Waypoint account, cloud folder or reporting form.
- Record only non-image details necessary for a report: platform, username, URL where safely available, dates, threats and the child's account. Do not repeatedly open links or explore an account to verify content.
- If content is received inadvertently, stop viewing, restrict access and notify the DLP and Gardaí promptly for instructions on lawful preservation or disposal. Do not circulate it internally or delete possible evidence on your own initiative before seeking advice. Do not take possession of a child's device as a routine response.
- Do not negotiate with an alleged exploiter, pay a demand, impersonate the child or contact the alleged person responsible. Help the child access authorised reporting and specialist support without increasing exposure.
- Handle alleged peer-created or AI-generated sexual imagery as a safeguarding concern. The child depicted or targeted receives support irrespective of whether an image is authentic. Staff must not make definitive legal classifications themselves.

Reporting removal and continued support

Where appropriate, support the child and host to use official platform reporting, trusted reporting services and Garda routes. Keep content removal separate from child-protection reporting and support. Record what was reported, when and any response; track reappearance and retaliation using minimal non-image information. Never promise removal, anonymity, a response time or a particular criminal outcome. Waypoint's practical platform knowledge does not imply privileged access or authority to direct a platform.

Safe demonstrations and product activity

Never use a live harmful-content feed, a child's actual account, sexualised prompts or tools that create abusive deepfakes. Use approved fictional, non-explicit demonstrations. Do not ask children to bypass age restrictions. New apps, AI tools, location features and safety prototypes require their own safeguarding and privacy assessment before testing. A workshop permission form does not authorise account access, location tracking, AI training or product research. No automated system may decide whether a child's disclosure is credible or whether it should be reported.

08 Research and youth participation

Conditions before research begins

Where Waypoint undertakes or supports research involving children, the responsible research lead must hold appropriate competence and secure the necessary ethics review. Written arrangements must identify responsibility for research methods, participant welfare, consent and data protection. Waypoint retains responsibility for safeguarding within its own activities.

Before recruitment or data collection, obtain the approved protocol and ethics decision, participant materials, data-flow map, controller and processor responsibilities, lawful bases, security and retention plan, and DPIA where required. Pseudonymous records remain personal data; describe data as anonymous only where re-identification is not reasonably possible. No partner assurance about aggregation replaces checking the actual collection and access arrangements. [6]

Consent assent and freedom to withdraw

Use an age-appropriate explanation of purpose, activities, risks, information sharing and confidentiality limits. Require the child's affirmative agreement and parent or guardian permission for under-18 research unless the ethics body approves a lawful, justified alternative. An adult participant provides their own consent. Recheck consent at each materially different activity and when a participant turns 18. A child's refusal prevails even if an adult has agreed. [7]

Separate consent to research, photography, recording, quotations, publication and future reuse. No pre-ticked or bundled permissions. Explain the withdrawal method and any point after which genuinely anonymised material cannot be retrieved. Safeguarding records may need to be retained even when research participation ends. Distinguish participation consent from the legal basis for processing personal data.

Assessment tools and sensitive inference

- Do not use individual exposure or vulnerability scores to diagnose, label, discipline, select children, restrict opportunity or trigger automated intervention. No individual scores may be exposed to peers or published. Any individual-level use requires a separately justified ethics and data-protection review before deployment.
- Assess foreseeable distress, bias, gendered violence, stigma and re-identification in small groups. Use voluntary, minimal data and an accessible alternative. Never recruit a child because staff suspect they have experienced abuse without a specifically approved, protective recruitment plan.
- Do not put identifiable disclosures, contact details or raw child data into general-purpose AI services. No facial or voice cloning, biometric inference or training of models on participants' material is authorised by routine participation consent.
- A research disclosure activates the same reporting procedure as any other disclosure. Establish a disclosure protocol even for an anonymous survey; explain honestly when anonymity prevents individual follow-up and provide support routes at the start and end.

Restorative activity and public participation

No child is required to meet, forgive, mediate with or share a group with a person alleged to have harmed them. Restorative work needs specialist suitability assessment, freely given agreement, a safety plan and the ability to stop; it never replaces statutory reporting. Youth-led events, consultations and advocacy use supervised mentors and fictional data, separate publicity consent and screened outputs. Do not publish identifiable accounts of abuse or small-group findings that expose participants.

09 Records information sharing and accountability

A separate restricted safeguarding record

Use a designated encrypted organisational location with role-based access, multifactor authentication, access logging and secure backup. The DLP and authorised deputy hold access; the independent recipient needs a separate protected route for allegations against the lead. Maintain and test these arrangements. Personal devices, open shared drives, ordinary activity folders and group messaging are not approved case-record locations.

Record facts, actions, agency advice, the basis for sharing or withholding information, referrals, acknowledgement and follow-up. Use a case identifier in oversight records. Do not include case details in workshop evaluations, research datasets, CRM notes, AI prompts or general meeting minutes. Disclose only necessary information to authorised recipients and use secure transfer. Confidentiality is limited by safeguarding and legal duties; it is not a promise of absolute secrecy.

Maintain a documented retention schedule for safeguarding, personnel, consent and research records separately, taking account of legal duties, possible claims and agency advice. Do not apply a single period to every record. Review necessity at least annually; preserve records subject to an investigation or legal hold and document authorised secure destruction. Requests for access or correction require identity checks and assessment of other people's rights and protection needs. Never erase an original factual record silently; add dated corrections.

For a data breach, contain access, preserve an audit trail and assess risk immediately. Notify the responsible controller and safeguarding lead. The controller assesses statutory notifications, including the GDPR 72-hour deadline where notification to the supervisory authority is required, and communication to affected people where required. Safeguarding and breach response run together, without delaying protection. [8]

Review implementation rather than just the document

When	Evidence and accountable action
Before each activity	Delivery lead verifies contacts, staffing, checks, risk controls, participant information and support arrangements. Record a go or no-go decision.
After sensitive sessions	Delivery lead checks disclosures, incomplete handovers, staff support needs and participant feedback. Escalate unresolved risks immediately.
Quarterly while active	Policy owner reviews recruitment and training completion, reporting timeliness, repeat boundary concerns, overdue actions, access logs and accessible feedback. Record corrective actions and owners.
Annually and on material change	Review the policy, statement and risks with workers and age-appropriate youth input. Trigger earlier review after an incident, new technology, new country or new service.
At least every three years	Arrange an independent safeguarding evaluation and track recommendations. No claim of external certification or standards accreditation is made by this policy.

Management must resource corrective action and suspend work where safeguards fail. Use anonymised themes for oversight and partner learning; a low complaint count is not evidence of safety. This policy is structured against the Keeping Children Safe areas of policy, people, procedures and accountability. [9]

10 Child safeguarding statement

This statement forms part of Waypoint’s adopted safeguarding policy and is made available to workers, families and the public. It is read alongside the service risk assessment and the procedures in this policy. Waypoint reviews the statement and its relevant-service obligations under the Children First Act 2015 whenever its services change. [1]

Service and guiding principles

Waypoint provides digital-safety education, workshops, resources and advisory support to schools, young people and supporting adults, including supervised participation in relevant research and youth activities. We recognise every child’s right to dignity, to be heard and to be protected. We will take reasonable steps to prevent harm while a child uses our services and respond promptly to concerns.

Risk assessment

The written assessment in sections 11–12 addresses potential harm during the service: unsafe adults or boundaries, inadequate supervision, harmful content, peer abuse, distress, failure to report, unsafe research, misuse of images or data and gaps between partners. The delivery lead must adapt it to the actual service, verify controls and resolve outstanding actions before delivery. A generic register does not establish that local risks are controlled.

Specified procedures and where to find them

Procedure	Policy location
Managing identified risks	Delivery controls in section 4; digital and research controls in sections 7–8; risk register in sections 11–12.
A staff member subject to an investigation about a child	Section 6: protective restrictions, statutory referrals, independence and a separate fair personnel process.
Safe selection and recruitment	Section 3: suitability, references, role-based vetting and checks before relevant work.

Procedure	Policy location
Information instruction and training on recognising harm	Section 3: induction, role-specific training, refreshers and records; sections 5 and 7: practical response.
Reporting to Tusla by the provider or staff	Section 5: direct reporting, thresholds, agency advice, verification and personal mandated duties.
Maintaining a list of mandated persons	Section 2: role-based list, nil return where applicable and review when roles change.
Appointing the relevant person	Sections 2 and 14: named appointment, acceptance, contact details and first-contact responsibility for this statement.

Availability and review

Provide this statement to workers; display it where the service is provided as appropriate; make it available to parents, Tusla and the public on request; and publish the policy online. Provide a child-friendly route to help. Review annually and after material changes; statutory review must in any event occur within 24 months. [1, 5]

Relevant person Darren Bracken

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Adopted and effective 20 October 2026

Next scheduled review 20 October 2027

Service-specific deputy and independent reporting contacts are provided in the safeguarding contact sheet. Anyone may contact Tusla or Gardaí directly.

11 Safeguarding risk assessment for delivery

Baseline assessment dated 20 October 2026. Applies to Waypoint’s workshops, youth activities, online services and research support. Review with the host before each activity. Ratings are risk judgements, not measured findings. High means serious harm is plausible without controls; moderate means credible exposure remains and needs active oversight. Residual ratings apply only after the listed controls are verified. No unmitigated high risk is acceptable.

Risk and initial rating	Controls and responsible owner	Residual and evidence needed
1 Unsuitable adult gains access High	Director verifies identity, references, required vetting, suitability decision and signed conduct code. Host controls visitor access.	Moderate Checks register and restricted recruitment records. No child-facing start with mandatory checks missing.
2 Grooming or hidden one-to-one contact High	Delivery lead uses observable settings, supervised contact and approved organisational channels. Independent recipient handles concerns about director.	Moderate Contact route tested; host supervision confirmed; boundary briefing recorded.
3 A disclosure is missed or delayed High	DLP trains staff, maintains referral routes and confirms statutory report receipt. Individuals can bypass lead.	Moderate Disclosure exercise completed; current Tusla and school contacts; referral and follow-up record.
4 Public disclosure or distress in a session High	Facilitator uses fictional cases, content notices, opt-out route and supported quiet space. No personal testimony is solicited.	Moderate Lesson review, support adult and alternative activity confirmed.

Risk and initial rating	Controls and responsible owner	Residual and evidence needed
5 Peer bullying sexual harassment or retaliation High	Host and facilitator agree behaviour rules, interrupt harm, separate support and monitor further contact. No forced mediation.	Moderate Incident protocol and safe follow-up owner recorded.
6 Sexual images or harmful material enter activity High	Facilitator uses screened non-explicit examples. No live feeds, harmful prompts, image collection or forwarding. Garda advice for accidental receipt.	Moderate Materials approved; screen-sharing controls checked; non-image reporting route briefed.

Activity specific completion

Activity and venue _____ Date _____
 Delivery lead _____ Host lead _____
 Ages and numbers _____ Needs and adjustments _____
 Additional risks and controls _____
 Evidence verified by _____ Date _____

12 Research digital and organisational risks

Risk and initial rating	Controls and responsible owner	Residual and evidence needed
7 Consent pressure or unsafe research inference High	The responsible research lead supplies ethics approval and protocol. Waypoint delivery lead checks assent, permission, refusal route and restrictions on individual score exposure.	Moderate Approved materials, data map, DPIA decision and consent records. No collection before clearance.

Risk and initial rating	Controls and responsible owner	Residual and evidence needed
8 Personal data or identities exposed High	Responsible controller and Waypoint lead restrict access, separate research and safeguarding records, minimise fields and suppress identifying small groups.	Moderate Controller allocation, secure system, access test, retention schedule and breach process.
9 Unsafe online contact or event intrusion High	Online lead uses restricted joining, two authorised adults, moderation and no private adult-child messaging. Recording off by default.	Moderate Platform settings tested and attendance and reporting arrangements confirmed.
10 Gaps between school and partners High	Director and host agree who supervises, responds, reports and follows up. Confirm a handover and statutory report rather than assuming completion.	Moderate Signed delivery agreement, named contacts, local authority map and referral receipt process.
11 Staff absence or conflict of interest High	Director appoints deputy and independent recipient. Every worker may report directly. Pause delivery without adequate cover.	Moderate Accepted appointments and tested availability; case access protected from implicated person.
12 Travel missing child or unsafe collection High	Host lead owns attendance, transitions and authorised collection. Separate approved plan for transport or residential work.	Low for routine on-site session Venue plan, registers and emergency process. Reassess for travel.
13 Unsafe publicity or AI prototype High	The activity lead obtains separate consent, screens outputs, prohibits identifiable abuse accounts and requires product-specific privacy and safety review.	Moderate Publication checks and permissions; no model training or location testing under workshop consent.

Decision and change control

Outstanding control or action _____

Owner _____ Due date _____

Decision Proceed / Proceed with documented conditions / Postpone

Reason and remaining risk _____

Authorised by _____ Date _____

Stop and reassess if staffing, participant needs, venue, tools, data use or activity changes. A control marked “to arrange” is not implemented. For research, the ethics and data-protection conditions are mandatory gates; no delivery manager may waive them to meet a recruitment target.

13 Practical records and participant information

Concern record to store securely

Case identifier _____ Date and time received _____
Recorder and role _____ Contact _____
Child's name and necessary identifiers _____
Where the child is now and immediate safety needs _____
Source of concern Child / Observation / Third party / Other
Exact words and relevant factual observations _____
People present and context _____
Action taken and by whom _____
DLP or independent recipient notified and time _____
Tusla or Garda contact advice reference and receipt _____
Report made by and date _____
Parent and child informed or reason not informed _____
Information shared with whom and why _____
Support owner next contact and review date _____
Outstanding actions and escalation _____
Recorder signature _____ Date _____

Do not attach sexual images or speculative conclusions. Record any decision not to refer, the advice and rationale, and the reporter's direct-reporting option. Keep an audit trail of additions and corrections.

Before delivery checklist

Confirm named DLP, deputy, independent recipient, host lead and local statutory routes. Verify recruitment and training checks, supervision and accessibility, screened materials, safe opt-out arrangements, consent requirements, secure records and risk approval. Research also needs ethics and data clearance. Record who checked each item, date, evidence and unresolved actions. If a required safeguard is absent, postpone.

What we tell young people

You can ask questions, take a break or choose not to share. You do not have to tell a personal story or show us your phone. If something worries you, speak to your teacher, another trusted adult or the named safeguarding contact for this activity. You can ask for someone else if the first person does not help or if your concern is about that person. You will not be punished for asking for help.

We will listen and explain what we need to do. We cannot keep a secret if we think someone may be unsafe. We only tell people who need to help. You do not need to send us an image or prove what happened. If you are in immediate danger, ask a safe adult for help or call 112 or 999.

Give this information verbally and in an accessible format. Include the actual activity contacts before distribution and explain the available reporting routes. Ask young people whether they know how to get help and use their feedback to improve the route.

14 Policy governance and review

Ownership implementation and review arrangements

Governance requirement	Policy arrangements
Status and authority	Adopted by Waypoint on 20 October 2026. Applies to everyone acting for the organisation.
Policy owner DLP and relevant person	Darren Bracken, Founder and Director darren@way-point.ie +353 87 114 9442
Deputy cover	The director maintains suitable cover and communicates named contacts and availability through each service's safeguarding contact sheet.
Independent reporting route	Concerns about the director or DLP bypass that person. Use the service's independent reporting contact or contact Tusla or Gardaí directly. An impartial person oversees any internal response.
Implementation evidence	Maintain checks and training records, the mandated-person list, restricted case records, retention schedule, delivery agreements and local referral information. Review evidence before delivery and through management oversight.
Publication and review	Provide the current policy to workers and make it publicly available. Next annual review 20 October 2027. Independent evaluation at least every three years; next due by 20 October 2029, or earlier where required.

Keep appointment details accessible to participants and workers. Verify contact availability before each activity. Maintain implementation evidence and resolve any gap promptly. The director records reviews, material changes and corrective actions and ensures that workers and relevant partners receive the current policy.

Sources checked on 20 October 2026

- [1] Children First Act 2015, revised text, section 11 and schedules.
revisedacts.lawreform.ie/eli/2015/act/36/revised/en/html
- [2] Tusla reporting routes and portal. tusla.ie/children-first/report-a-concern/ and portal.tusla.ie
- [3] Tusla guidance on mandated reporting.
tusla.ie/children-first/mandated-persons/how-do-i-report-a-concern-about-a-child/
- [4] Tusla Garda vetting guidance. tusla.ie/children-first/organisations/garda-vetting/
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