



SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY

Organisation	SINCE 9/11
Policy owner	Designated Safeguarding Lead / Charity Director
Approved by	Board of Trustees
Review cycle	At least annually, and sooner following significant legislative, statutory guidance or organisational change

1. Statement of policy

Safeguarding children and adults at risk is a priority for SINCE 9/11. The nature of our educational, training, events and engagement activities means that employees, freelancers/contractors, volunteers, trustees, students and others working on our behalf may come into contact with children or adults at risk.

Everyone working on behalf of SINCE 9/11 has a responsibility to safeguard and promote welfare, to remain alert to signs that a child or adult may need help or protection, and to report concerns promptly. We work on the basis that safeguarding is everyone's responsibility and that concerns can arise in any setting.

This policy sets out the arrangements through which SINCE 9/11 seeks to provide a safe, responsive, inclusive and anti-discriminatory environment. It applies to all employees, freelancers/contractors, volunteers, trustees, agency staff, students and anyone undertaking work on behalf of SINCE 9/11.

2. Purpose

The purpose of this policy is to:

- protect children and adults at risk who are involved in, or affected by, SINCE 9/11's work;
- ensure concerns are recognised, recorded, shared and acted upon without avoidable delay;
- provide clear procedures for disclosures, allegations, low-level concerns and referrals;
- support a child-centred approach in which the child's wishes, feelings, lived experience and best interests are considered;
- ensure that safeguarding practice is inclusive and recognises barriers to disclosure and differing vulnerabilities;
- clarify how SINCE 9/11 works alongside schools, colleges, local authorities and other statutory agencies.

3. Our approach to safeguarding

3.1 Safeguarding roles and responsibilities

The Designated Safeguarding Lead (DSL) at SINCE 9/11 is the Charity Director. The DSL provides advice and support, oversees safeguarding records and organisational practice, makes or coordinates referrals, and liaises with statutory agencies and host organisations as required.

A trustee-level Designated Safeguarding Director/Trustee provides oversight, challenge and support to the DSL and helps ensure that safeguarding policies, procedures, training and governance arrangements remain effective.

Any concern or allegation relating to the DSL/Charity Director must be reported directly to the Designated Safeguarding Director/Trustee. If the concern relates to that person, it must be raised with another appropriate trustee and, where necessary, directly with the relevant statutory authority.

3.2 Safer recruitment and criminal record checks

SINCE 9/11 will use proportionate and robust recruitment and selection procedures. Each role will be assessed to determine whether it constitutes regulated activity and what level of criminal record and barred-list checking is permitted or required by current law.

Where applicable, the appropriate DBS check in England and Wales, Disclosure Scotland check in Scotland or AccessNI check in Northern Ireland will be undertaken. SINCE 9/11 will keep its practice under review as the legal definition of regulated activity and associated checking requirements change.

From 1 September 2026, changes made by the Crime and Policing Act 2026 remove the supervision exemption from regulated activity with children. SINCE 9/11 will take this into account when assessing relevant roles, including volunteer roles involving teaching, training, instructing, caring for or supervising children.

3.3 Learning, development and safeguarding culture

All employees, freelancers/contractors and volunteers will receive safeguarding information appropriate to their role at induction and appropriate updates thereafter. Those with designated safeguarding responsibilities will undertake enhanced training and maintain current knowledge.

Leaders and trustees will promote a culture in which concerns can be raised without fear of recrimination, professional curiosity is encouraged, racism and discrimination are challenged, and the welfare of children and adults at risk remains central to decision-making.

3.4 Working in schools, colleges and other host settings

When SINCE 9/11 delivers activity in a school, college or another organisation's setting, our personnel must follow this policy and the safeguarding arrangements of the host setting. Before delivery, the lead facilitator should know how to contact the host Designated Safeguarding Lead or other safeguarding contact.

Where a concern about a child arises during an activity in a school or college, it should normally be reported immediately to the host setting's DSL as well as through SINCE 9/11's internal safeguarding route, unless doing so would create an additional risk or statutory agencies need to be contacted immediately.

4. Definitions and forms of harm

For the purposes of this policy:

- Child: any person under the age of 18.

- Adult at risk: an adult who has needs for care and support, is experiencing or is at risk of abuse or neglect, and as a result of those needs is unable to protect themselves from the abuse or neglect or the risk of it.
- Safeguarding: action taken to promote welfare and protect people from harm.
- Child protection: activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Abuse, neglect and exploitation may occur offline or online and may be perpetrated by adults or by other children. Relevant forms of harm include physical, sexual and emotional abuse; neglect; domestic abuse; discriminatory abuse; financial/material abuse; modern slavery; exploitation; coercive control; harmful practices; bullying; online abuse; and radicalisation or extremist exploitation.

4.1 Child-on-child abuse

SINCE 9/11 recognises that children can abuse other children and that this must never be dismissed as 'banter', 'part of growing up' or similar. Child-on-child abuse may include bullying and cyberbullying, sexual violence and sexual harassment, abuse within intimate relationships, coercive or controlling behaviour, harmful sexual behaviour, and consensual or non-consensual sharing of nude or semi-nude images.

The absence of a report does not mean that abuse is not occurring. Any concern must be treated seriously and reported through the safeguarding procedure.

4.2 Additional vulnerabilities and barriers to disclosure

Some children may face additional risks or barriers to seeking help, including children with SEND or communication needs, children experiencing discrimination, children known to social care, looked-after and previously looked-after children, and children affected by exploitation, domestic abuse or other adversity. Safeguarding responses should be inclusive, anti-discriminatory and responsive to the child's communication and support needs.

5. Recording and reporting concerns

5.1 General reporting principles

Employees, freelancers/contractors and volunteers must report concerns about the welfare of a child or adult at risk, including concerns about the conduct of another worker or volunteer. A person receiving a concern must not investigate or attempt to prove an allegation.

- Ensure your own immediate safety and that of others.
- If there is an immediate risk of serious harm or an emergency, call 999.
- Treat all disclosures and allegations seriously.
- Report the concern to the host setting's DSL where relevant and to the SINCE 9/11 DSL as soon as possible.
- Record what was seen, heard or disclosed accurately, using the person's own words where possible.

5.2 Responding to a disclosure or safeguarding concern

1. Listen carefully, remain calm and offer reassurance. Do not promise confidentiality or secrecy.
2. Do not ask leading or investigative questions. Clarify only what is necessary to establish the basic facts and immediate safety.
3. Make a written record as soon as possible, noting the date, time, context, observations and the person's own words where possible.
4. If there is an immediate risk of serious harm or an emergency, call 999. Inform the DSL/host DSL as soon as it is safe to do so.

5. Where the concern is not an emergency, report it immediately to the DSL and, in a host school/college, to the host DSL in accordance with local procedures.
6. The DSL will assess the information and make or coordinate any referral to children's social care, adult social care, police or another relevant statutory service without avoidable delay. Where a referral is required it should be made immediately or as soon as practicably possible according to the level of risk.
7. The DSL will record decisions, reasons, referrals, advice received and known outcomes and will follow up where necessary.
8. If the person who raised the concern believes appropriate action has not been taken, they should escalate the concern to the Designated Safeguarding Director/Trustee or directly to the appropriate statutory agency.

5.3 Early help and emerging concerns

A concern does not need to reach the threshold of significant harm before it is reported. Staff should share emerging concerns so that children and families can receive appropriate help and support at the right time. The DSL will consider whether family help, local early support, statutory assessment or another response is appropriate.

5.4 Out-of-hours concerns

If a child or adult is at immediate risk of serious harm or there is an emergency, call 999. For urgent safeguarding concerns outside normal office hours, contact the relevant local authority emergency/out-of-hours safeguarding service where appropriate and inform the SINCE 9/11 DSL as soon as possible. The NSPCC helpline may be used for safeguarding advice but is not a substitute for the emergency services.

6. Concerns and allegations about people working with children

6.1 Allegations that may meet the harm threshold

Where an allegation indicates that an employee, freelancer/contractor, volunteer or trustee may have harmed a child, possibly committed an offence against or related to a child, behaved towards a child in a way that indicates they may pose a risk of harm, or behaved in a way that may indicate they are unsuitable to work with children, the matter must be reported immediately to the DSL or, where the allegation concerns the DSL, to the Designated Safeguarding Director/Trustee.

SINCE 9/11 will not undertake a substantive internal investigation before obtaining appropriate safeguarding advice where this could prejudice a statutory or criminal process. The appropriate Local Authority Designated Officer (LADO), or equivalent arrangements in Scotland, Wales or Northern Ireland, and/or the police will be consulted or notified as required. Any employment, suspension, redeployment or volunteer-management decision will be made with safeguarding risk in mind and, where relevant, following advice from the statutory authority.

6.2 Low-level concerns

A low-level concern is any concern, however small, that an adult working on behalf of SINCE 9/11 may have acted in a way that is inconsistent with the staff code of conduct, including conduct outside work, even where the behaviour does not appear to meet the harm threshold.

Low-level concerns should be reported to the DSL and recorded appropriately. The DSL will review patterns, context and whether the matter should be escalated. Concerns about the DSL must be reported to the Designated Safeguarding Director/Trustee.

7. Online safety, digital communication and emerging harms

SINCE 9/11 recognises that safeguarding risks increasingly move between online and offline environments. Our work may involve discussion of terrorism, extremism, conspiracy narratives, misinformation/disinformation and harmful online content. Such discussion can prompt disclosures or reveal vulnerabilities and must be handled in accordance with this policy.

Online safeguarding should consider four broad areas of risk:

- Content - exposure to harmful, extremist, violent, sexual, discriminatory, misogynistic, misleading or otherwise inappropriate material.
- Contact - harmful interaction with other users, including grooming, exploitation, coercion, harassment or inappropriate adult contact.
- Conduct - a person's own online behaviour, including bullying, sexual harassment, image sharing or conduct that places themselves or others at risk.
- Commerce - risks such as scams, financial exploitation, inappropriate advertising or other harmful commercial activity.

Digital communication with children must be professional, necessary for the activity and use approved organisational or host-setting channels wherever possible. Staff must not use private messaging or personal social-media relationships to build or maintain inappropriate contact with children.

Images and recordings must only be taken, stored and used in accordance with SINCE 9/11's consent, data-protection and communications arrangements and any requirements of the host setting.

8. Support, lone working and wellbeing

Roles involving sensitive, traumatic or challenging material can affect worker wellbeing. SINCE 9/11 will consider the need for supervision, debriefing, personal-safety measures and other appropriate support. Lone workers must know how to obtain safeguarding and emergency support.

9. Safeguarding code of conduct

All employees, freelancers/contractors, volunteers and trustees must follow the Safeguarding Code of Conduct at Appendix B. The code forms part of SINCE 9/11's safeguarding arrangements and is intended both to protect children and adults at risk and to help those working on our behalf maintain clear professional boundaries.

10. Confidentiality, information sharing and record keeping

Safeguarding information will be handled sensitively, lawfully and on a need-to-know basis. Records will be stored securely with access restricted to those who require it for safeguarding or governance purposes.

Data protection law does not prevent the sharing of information where sharing is necessary and proportionate to safeguard a child or adult at risk. The safety and welfare of the person concerned must be the primary consideration. Consent should be sought where appropriate, but lack of consent will not prevent information being shared where there is a lawful safeguarding basis to do so.

The DSL will keep information-sharing practice under review, including implementation of the statutory information-sharing duty applying from September 2026 and the final statutory guidance issued under it.

Designated Safeguarding Lead contact: yvonne.richards@since911.com | Tel: 0300 102 0911

11. Whistleblowing, complaints and escalation

No person working on behalf of SINCE 9/11 should feel unable to raise a safeguarding concern. Concerns about safeguarding practice, failures to act, unsafe working practices or the conduct of colleagues may be raised with the DSL, line manager or Designated Safeguarding Director/Trustee. Concerns relating to the DSL must be raised through the alternative trustee route.

Where a person believes that SINCE 9/11 has not responded appropriately, they may raise the matter directly with the relevant local authority safeguarding service, LADO/equivalent, police or other appropriate statutory body. Complaints about the way SINCE 9/11 has handled a safeguarding matter will also be managed under the organisation's complaints procedure.

Existing independent internal escalation contacts should be checked and confirmed at each annual review.

12. References and associated guidance

- Children Act 1989 and Children Act 2004.
- Care Act 2014.
- Safeguarding Vulnerable Groups Act 2006, as amended.
- Working Together to Safeguard Children 2026.
- Keeping Children Safe in Education 2026 (in force from 1 September 2026).
- Current statutory/gov.uk guidance on regulated activity with children, including removal of the supervision exemption from 1 September 2026.
- Prevent Duty guidance, where relevant to SINCE 9/11's work.
- UK GDPR and Data Protection Act 2018.
- Current Department for Education information-sharing guidance and the statutory information-sharing duty applying from September 2026.
- Relevant national and local safeguarding partnership procedures in England, Scotland, Wales and Northern Ireland.

Version control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
2.0	Board of Trustees		2026 review and update	Annually

APPENDIX A - Safeguarding Record Form

Complete this form as soon as possible. Do not delay reporting because some information is unavailable. Record facts, observations and the person's own words where possible. Do not investigate.

Emergency: if there is an immediate risk of serious harm or an emergency, call 999. In a school/college or other host setting, also alert the host DSL/safeguarding contact as soon as possible. Send completed records securely to the SINCE 9/11 DSL.

Details of child/adult at risk

Name	
Date of birth/age (if known)	
Contact details (if appropriate)	
Parent/carer details (if relevant)	
School/organisation	

Your details

Name	
Role	
Contact number/email	
Date and time form completed	

Concern/disclosure

Date/time/location of incident or disclosure	
What you observed or were told (use exact words where possible)	
Immediate safety concerns	
Any witnesses	

Action already taken	
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Person alleged to have caused harm (if known)

Name/description	
Role/relationship to child/adult	
Organisation	
Other relevant identifying information	

People/agencies informed

Host DSL	
SINCE 9/11 DSL	
Police/emergency services	
Children's/adult social care	
LADO/equivalent	
Other	

DSL assessment and actions

Risk assessment/decision	
Advice obtained	
Referral made and date/time	
Rationale for decision	

Follow-up/outcome	
DSL name/signature/date	

APPENDIX B - Safeguarding Code of Conduct

This code applies to all employees, freelancers/contractors, volunteers and trustees undertaking activity on behalf of SINCE 9/11.

We expect everyone working on our behalf to:

- place the welfare and safety of children and adults at risk first;
- maintain appropriate professional boundaries in person and online;
- report safeguarding concerns promptly and never investigate a disclosure themselves;
- listen respectfully and avoid promising secrecy;
- use approved communication channels and avoid unnecessary private one-to-one digital contact with children;
- challenge bullying, discrimination, racism, harassment and unsafe practice;
- follow host-setting safeguarding arrangements when working in schools, colleges or other organisations;
- report low-level concerns and behaviour that may be inconsistent with this code;
- cooperate with safeguarding enquiries and maintain appropriate confidentiality;
- disclose information relevant to their suitability to undertake their role where required by law or organisational procedure.

People working on behalf of SINCE 9/11 must not:

- intimidate, bully, threaten, discriminate against, coerce or undermine a child, adult at risk, colleague or volunteer;
- develop or seek inappropriate personal, sexual or exploitative relationships;
- use their role or relationship with a student, teacher, donor or family for personal gain;
- give gifts, rewards or privileges in a way intended to create secrecy, dependency or an inappropriate relationship;
- engage in sexualised, suggestive or otherwise inappropriate communication, including texts, direct messages or emails;
- share personal contact details or connect with children through personal social-media accounts unless an exceptional, authorised safeguarding arrangement requires it;
- take, store or share images or recordings outside approved consent and organisational procedures;
- work while adversely affected by alcohol, illegal drugs or any substance that makes them unsafe to carry out their role;
- encourage, facilitate or conceal unlawful or abusive behaviour.

Acknowledgement: I have read, understood and agree to follow the SINCE 9/11 Safeguarding Code of Conduct.

Name	
Signature	
Date	