



Safeguarding Policy and Procedures

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Safeguarding context for SNS

SNS is a British education charity, working primarily in secondary schools and with secondary school children. During our school sessions, the school, the teacher, and the school safeguarding lead have a statutory duty to follow safeguarding procedures and laws and to safeguard the children in their care. The school has primary responsibility for the children at the school.

When SNS enters the school, we follow all safeguarding laws, our own safeguarding policies, as well as any specific procedures that the school communicates to us. The school is responsible for the children. That being said, SNS must have good safeguarding practices in order to ensure that staff, volunteers, and speakers behave appropriately and in order to support staff, volunteers, and speakers in knowing what to do in case of a disclosure from a student.

SNS also runs Student Leadership Programmes. The one day programmes are run with teachers also attending and therefore those teachers have primary responsibility for the children attending. SNS must still uphold safeguarding laws, practices, and policies.

The Student Leadership Programme which runs in the summer sees up to 20 children being under SNS' direct supervision and care. It is in this context that SNS has primary responsibility for the children.

Additionally, social media and the internet raises other contexts of safeguarding for SNS.



1. Safeguarding Statement

Solutions Not Sides (SNS) is committed to safeguarding and promoting the welfare of all children, young people and adults at risk who come into contact with the organisation.

SNS recognises that safeguarding is everyone's responsibility. All trustees, employees, volunteers, speakers, contractors and others working on behalf of SNS have a responsibility to contribute to a safe environment and to act promptly where they have a concern about the welfare or safety of another person.

The welfare and safety of children and adults at risk will be a primary consideration in all SNS activities and decision-making.

SNS will take all reasonable and proportionate steps to:

- prevent abuse, neglect, exploitation and other forms of harm;
- promote a culture in which safeguarding concerns can be raised openly;
- ensure that concerns are recognised and responded to promptly;
- listen to children and adults at risk and take their views, wishes and feelings seriously;
- work appropriately with parents, carers, schools, partner organisations and statutory agencies;
- ensure that staff, volunteers and speakers understand their safeguarding responsibilities;
- use safer recruitment and appropriate DBS checks;
- provide appropriate safeguarding training;
- maintain appropriate safeguarding records;
- learn from safeguarding incidents and concerns; and
- review and improve safeguarding arrangements regularly.

SNS will never assume that safeguarding responsibility rests solely with a school, partner organisation or another agency. Where a safeguarding concern comes to the attention of SNS, SNS will take appropriate action within its own responsibilities and will make referrals to statutory agencies where necessary.

2. Scope

This policy applies to:

- all SNS trustees;
- employees and consultants;
- volunteers and interns;
- speakers and facilitators;
- temporary and sessional workers;
- contractors and freelancers;
- individuals representing SNS at events;
- individuals working on behalf of or alongside SNS where they have contact with children or adults at risk; and
- anyone otherwise acting on behalf of SNS.

It applies to all SNS activities, including but not limited to:

- school workshops;
- educational sessions;
- conferences and events;
- the Student Leadership Programme;
- trips, visits and residential activities;
- online sessions;
- meetings with young people;
- work undertaken in partnership with schools and community organisations;
- activities involving external speakers;
- activities involving adults at risk; and
- communications undertaken on behalf of SNS.



3. Definitions

3.1 Child

For the purposes of this policy, a child is anyone under the age of 18.

3.2 Adult at risk

SNS uses the term "adult at risk" rather than the term "vulnerable adult".

For the purposes of adult safeguarding, an adult at risk is generally an adult who:

- has needs for care and support, whether or not those needs are being met by the local authority;
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care and support needs, is unable to protect themselves against the abuse or neglect or the risk of it.

SNS recognises that adults may also experience vulnerability or safeguarding risks outside the statutory Care Act definition. Where there is a concern about an adult's safety, SNS will respond proportionately and seek appropriate advice. We have a separate policy pertaining to keeping our staff and speakers safe.

The Care and Support Statutory Guidance identifies safeguarding as protecting an adult's right to live in safety, free from abuse and neglect, while promoting their wellbeing, views, wishes and feelings. It also emphasises empowerment, prevention, proportionality, protection, partnership and accountability.

3.3 Safeguarding

Safeguarding means protecting children and adults at risk from abuse, neglect, exploitation and other forms of harm, promoting their welfare and taking appropriate action where concerns arise.

4. Legal and Regulatory Framework

This policy is designed to operate in accordance with the law and statutory/non-statutory guidance applicable to SNS's activities in England.

Relevant legislation and guidance includes, as applicable:

- Children Act 1989;
- Children Act 2004;
- Education Act 2002;
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Care Act 2014;
- Equality Act 2010;
- Children and Social Work Act 2017;
- Domestic Abuse Act 2021;
- Data Protection Act 2018;
- UK General Data Protection Regulation;
- relevant legislation relating to Prevent and counter-terrorism;
- Working Together to Safeguard Children 2026;
- Keeping Children Safe in Education 2026, where relevant to SNS's work in or with schools and colleges;
- current Disclosure and Barring Service guidance;
- current Care and Support Statutory Guidance; and
- relevant local safeguarding partnership and safeguarding adults procedures.

SNS will keep this policy under review whenever relevant legislation or statutory guidance changes.

Working Together to Safeguard Children 2026 is the current statutory guidance on multi-agency safeguarding in England and expressly provides the framework for organisations and agencies working to help, support and protect children.

5. Principles

SNS believes that:

- the welfare of children and adults at risk is paramount;
- everyone has the right to live, learn and work free from abuse, neglect, exploitation and discrimination;
- safeguarding is everyone's responsibility;
- all children and adults at risk should be treated with dignity and respect;
- safeguarding arrangements should be inclusive and responsive to individual needs;
- children should be listened to and their views, wishes and feelings taken seriously;
- adults at risk should be supported to exercise choice and control wherever possible;
- concerns should be acted upon rather than ignored;
- safeguarding decisions should be proportionate to the level of risk;
- information should be shared appropriately and lawfully where necessary to protect someone from harm;
- staff and volunteers should be supported to raise concerns about colleagues or organisational practice;
- no one should suffer disadvantage for raising a safeguarding concern in good faith; and
- safeguarding practice should be reviewed and improved in response to learning.

SNS recognises that children may have additional safeguarding needs because of disability, communication difficulties, language, cultural background, discrimination, isolation or other circumstances. These factors will be taken into account when assessing and responding to concerns.

6. Safeguarding Responsibilities

6.1 Board of Trustees

The Board of Trustees has overall governance responsibility for ensuring that SNS has effective safeguarding arrangements.

Trustees will:

- ensure appropriate safeguarding policies and procedures are in place;
- ensure safeguarding is considered as part of organisational risk management;
- ensure appropriate resources are available for safeguarding;
- ensure appropriate safeguarding training is undertaken;
- receive appropriate safeguarding reports and assurance;
- ensure serious incidents are reported to the Charity Commission where required;
- ensure the organisation learns from safeguarding concerns and incidents; and
- ensure the DSL has sufficient authority, time and resources to fulfil the role.

The Charity Commission expects trustees to ensure that their charities have appropriate safeguarding arrangements and, where relevant, to report serious safeguarding incidents.



6.2 Designated Safeguarding Lead

SNS Designated Safeguarding Lead:

Name: Jess Brandler

Role: Deputy Director

Telephone: 07900323676

Email: jess@sns.space

The DSL is responsible for coordinating SNS's safeguarding arrangements and acting as the principal safeguarding point of contact.

The DSL will:

- receive and consider safeguarding concerns;
- provide advice to staff and volunteers;
- determine appropriate next steps, seeking external advice where necessary;
- make or facilitate referrals to children's social care, adult safeguarding services, police or other relevant agencies;
- liaise with school Designated Safeguarding Leads and partner organisations;
- maintain safeguarding records;
- oversee safeguarding training;
- support safer recruitment arrangements;
- oversee safeguarding risk assessments;
- advise on safeguarding allegations against staff, volunteers and speakers;
- consider whether referral to the Local Authority Designated Officer (LADO) is required;
- consider whether a referral to the DBS is required;
- ensure appropriate information sharing;
- support safeguarding audits and policy reviews; and
- report safeguarding matters appropriately to the Executive Director and Board of Trustees.

The DSL must not delay an urgent referral while waiting for approval from another SNS employee or partner organisation.

6.3 Deputy Designated Safeguarding Lead

SNS will appoint one Deputy DSL.



Deputy DSL:

Name: Miriam Tomusk

Telephone: +44 7999 343327

Email: miriam@sns.space

The Deputy DSL will support the DSL and act in their absence.

SNS will ensure that appropriate safeguarding cover is available during activities involving children.

6.4 Executive Director / Senior Leadership

The Executive Director is responsible for ensuring that safeguarding is embedded throughout SNS's organisational culture and operational practice. Where a safeguarding concern relates to the DSL, the concern must be reported directly to the Executive Director or Chair of Trustees. Where a concern relates to the Executive Director, it must be reported directly to the Chair of Trustees.

6.5 All staff, volunteers and representatives

Every person working for or representing SNS must:

- familiarise themselves with this policy;
- undertake safeguarding training appropriate to their role;
- maintain appropriate professional boundaries;
- report safeguarding concerns immediately;
- record concerns accurately and promptly;
- cooperate with safeguarding enquiries;
- never investigate an allegation themselves;
- never promise a child or adult complete confidentiality;
- follow SNS's procedures for online communication and photography;
- and
- seek advice whenever they are uncertain about a safeguarding concern.

A person should report a concern even where they are uncertain whether abuse has occurred. Staff and volunteers are not expected to prove abuse before reporting a concern.

7. Safer Working Practice

SNS personnel will maintain professional boundaries at all times.

SNS will:

- work openly and transparently wherever possible;
- avoid unnecessary one-to-one situations with children;
- ensure that unavoidable one-to-one contact is appropriately risk assessed and known to the relevant responsible adult;
- avoid physical contact except where appropriate and necessary;
- never engage in rough behaviour;
- never use humiliating, degrading or threatening behaviour;
- never use physical punishment;
- never make sexualised or suggestive comments to a child;
- never develop inappropriate personal or romantic relationships with children;
- never communicate with children through personal social media accounts unless specifically authorised under SNS procedures;
- never exchange inappropriate personal information with children;
- never transport children alone unless this has been specifically authorised and risk assessed;
- never invite a child to a private home;
- never use alcohol or illegal drugs while responsible for children;
- never smoke or vape in the presence of children;
- never use offensive or discriminatory language towards participants;
- never ignore bullying or discriminatory behaviour; and
- never ask a child to keep a secret about an interaction with an adult.

SNS recognises that safeguarding risks can arise from patterns of behaviour as well as individual incidents.

8. Online Safeguarding

SNS recognises that safeguarding applies equally to online activity.

This includes Zoom, Whatsapp, email, messaging platforms, social media, online learning platforms and other digital communications.

Staff and volunteers must:

- use SNS-approved platforms where possible;
- maintain professional boundaries;
- avoid private or unnecessary direct messaging with young people;
- use group communication wherever reasonably possible;
- avoid using personal social media accounts to communicate privately with participants;
- not share personal telephone numbers unless authorised and necessary;
- ensure online sessions are appropriately supervised;
- follow SNS rules concerning recording and photography;
- report online bullying, harassment, sexualised communication, grooming or other safeguarding concerns; and
- retain relevant evidence where a safeguarding concern has arisen and seek advice from the DSL before deleting messages or other material.

SNS recognises that online abuse may form part of wider exploitation, grooming or abuse and will respond accordingly.

9. Photography, Filming and Images

Photography and filming involving children must be undertaken only in accordance with SNS procedures and appropriate consent/authorisation.

SNS will:

- establish in advance whether photography or filming is permitted;
- ensure participants and parents/carers are appropriately informed where required;
- use authorised devices where possible;
- avoid identifying information being unnecessarily attached to images;
- store images securely;
- restrict access to authorised personnel;
- follow SNS's retention and deletion procedures;
- not permit inappropriate or intrusive photography;
- not permit staff or volunteers to take inappropriate images of children; and
- respond immediately to concerns about misuse of images.

Photography and filming must never compromise the dignity, privacy or safety of a child or adult at risk.

We have a separate policy on how we keep staff and speakers safe, which also includes the banning of photos of staff and speakers without explicit written consent.

10. Types of Abuse and Safeguarding Concerns

The following list is not exhaustive.

Safeguarding concerns may include:

- Physical abuse

Hitting, kicking, shaking, poisoning, burning, inappropriate restraint or other physical harm.

- Sexual abuse

Sexual assault, sexual exploitation, sexualised behaviour, grooming, inappropriate sexual communication, exposure to sexual material or sexual activity involving a child.

- Emotional or psychological abuse

Humiliation, intimidation, threats, coercion, controlling behaviour, isolation, harassment, bullying, discriminatory abuse or persistent criticism.

- Neglect

Failure to meet basic physical, emotional, medical, educational or other care needs.

- Domestic abuse

SNS recognises that children can be victims of domestic abuse in their own right and may be adversely affected by domestic abuse even where they are not directly assaulted.

- Child sexual exploitation

Sexual exploitation involving children, including where manipulation, coercion, gifts, money, status, relationships or technology are used.

- Child criminal exploitation

The exploitation of children for criminal activity, including county lines, trafficking, violence or other criminal purposes.



- Online abuse

Grooming, sexual exploitation, harassment, bullying, threats, coercion, image-based abuse or other harmful online activity.

- Bullying and discriminatory abuse

Including bullying based on disability, race, religion or belief, sex, sexual orientation, gender reassignment or other protected or personal characteristics.

- Financial or material abuse

Particularly relevant to adults at risk and including theft, fraud, coercion or exploitation.

- Modern slavery and trafficking

Including forced labour, sexual exploitation or other forms of exploitation.

- Honour-based abuse, forced marriage and FGM

SNS will respond to concerns in accordance with current statutory guidance and seek specialist advice where necessary.

- Radicalisation and extremism

SNS recognises safeguarding responsibilities relating to radicalisation and the risk of individuals being drawn into terrorism or extremist activity.

- Self-neglect

SNS will consider self-neglect concerns involving adults and seek appropriate adult safeguarding advice.

11. Prevent and Radicalisation

SNS recognises that safeguarding includes protecting children and adults at risk from the risk of radicalisation and extremist exploitation.

Staff should report concerns where they believe an individual may be:

- being groomed or manipulated towards extremist activity;
- expressing or demonstrating concerning changes in behaviour;
- being exploited by extremist groups or individuals;
- at risk of being drawn into terrorism

The DSL will seek appropriate advice and consider referral through the relevant local Prevent/Channel arrangements where appropriate.

Prevent concerns should be handled using the same principles of necessity, proportionality, lawful information sharing and safeguarding as other safeguarding concerns.

12. Recognising and Responding to a Disclosure

If a child or adult at risk discloses abuse or another safeguarding concern, staff should:

1. Stay calm.
2. Listen carefully.
3. Take the person seriously.
4. Allow them to speak at their own pace.
5. Reassure them that they have done the right thing by speaking to someone.
6. Explain that the information may need to be shared to keep them or someone else safe.
7. Avoid promising confidentiality.
8. Avoid leading, probing or investigative questions.
9. Where necessary, ask only brief, open questions to clarify what the person means or establish immediate safety.
10. Do not investigate the allegation.
11. Do not confront or question an alleged perpetrator.
12. Make a factual written record as soon as possible.
13. Report the concern immediately to the DSL or Deputy DSL.
14. Take immediate action if the person is in danger.

Staff should record, as far as possible:

- the date and time;
- the location;
- who was present;
- what was observed;
- the person's own words;
- any relevant actions taken;
- who was informed; and

- the reasons for any decisions made.

SNS staff should not attempt to establish whether abuse has occurred. Investigation and formal assessment are the responsibility of the appropriate statutory agencies.

13. Immediate Danger and Emergencies

If someone is in immediate danger, staff should contact the emergency services by calling 999 .

This should not be delayed while waiting to speak to the DSL.

Where urgent medical assistance is required, staff should arrange appropriate emergency medical care and inform medical professionals of the safeguarding concern where appropriate.

The DSL should be informed as soon as reasonably possible.

14. Reporting Safeguarding Concerns



Any safeguarding concern must be reported promptly to the SNS DSL or Deputy DSL.

14.a During an SNS workshop or school activity

The SNS staff member should:

1. ensure immediate safety;
2. inform the SNS DSL;
3. inform the school's Designated Safeguarding Lead;
4. make an appropriate record; and
5. follow the DSL's advice regarding referral and information sharing.

SNS must not assume that the school will automatically make every necessary referral.

Where the circumstances require it, SNS may make a referral directly to children's social care, the police or another statutory agency.

14.b Outside school settings

For SNS activities taking place outside a school such as the Bridge Builders Programme or a one day Student Leadership Programme, the DSL will determine the appropriate safeguarding response, including contacting:

- children's social care;
- adult social care;
- police;
- emergency services;
- parents/carers where appropriate and safe;
- relevant safeguarding partnership; or
- another appropriate agency.

15. Referral to Children's Social Care



Where there is reasonable concern that a child may be suffering, or may be at risk of suffering, significant harm, SNS will make or support an appropriate referral to the relevant children's social care service.

The DSL should not delay a referral because:

- a school has not responded;
- a parent/carer has not yet been contacted;
- another organisation has said it will deal with the matter; or
- the DSL is uncertain whether the threshold has been met.

Where the threshold is unclear, the DSL should seek advice from the relevant children's social care service or safeguarding partnership.

SNS will record the referral and the rationale for the decision.



Where SNS becomes concerned that an adult may be experiencing or be at risk of abuse or neglect, SNS will take appropriate action.

The DSL will consider:

- the immediate safety of the adult;
- the adult's wishes and desired outcomes;
- whether the adult has capacity to make relevant decisions;
- whether other people may also be at risk;
- whether a crime may have occurred;
- whether consent should be sought;
- whether seeking consent would increase risk;
- whether a referral to adult social care is appropriate; and
- whether the police or another agency should be contacted.

SNS will seek to promote the adult's autonomy and wellbeing while taking proportionate action to protect them.

The Care Act safeguarding framework emphasises empowerment, prevention, proportionality, protection, partnership and accountability.



SNS will take all allegations concerning staff, volunteers, speakers, contractors or other adults working with children seriously.

An allegation may require safeguarding action where an adult:

- has behaved in a way that has harmed a child or may have harmed a child;
- may have committed a criminal offence against or related to a child; or
- has behaved in a way indicating that they may pose a risk of harm to children.

Such concerns must not be dealt with solely as an internal disciplinary matter.

The DSL/appropriate senior leader will consider whether the matter should be referred to:

- the Local Authority Designated Officer (LADO);
- children's social care;
- the police;
- the Disclosure and Barring Service;
- the relevant professional regulator; or
- another appropriate agency.

SNS will seek advice from the relevant LADO where appropriate.

The alleged person should not be informed of details of an allegation where doing so could prejudice a safeguarding or criminal investigation.

18. Concerns About the DSL or Senior Leadership



If the allegation or concern relates to the DSL:

The concern must be reported directly to the Executive Director or Chair of Trustees.

If the concern relates to the Executive Director:

The concern must be reported directly to the Chair of Trustees.

If the concern relates to the Chair of Trustees:

the concern should be reported to another appropriate trustee and/or the relevant external safeguarding authority.

No person should be prevented from raising a safeguarding concern because the concern relates to the person who would ordinarily receive it.

SNS will maintain a culture in which concerns about behaviour are reported before they escalate.

A low-level concern is information suggesting that an adult working with children may have acted in a way that is inconsistent with professional standards or the organisation's expectations, but which does not meet the threshold for an allegation of abuse.

Examples may include:

- unnecessary private messaging;
- inappropriate jokes or comments;
- excessive favouritism;
- inappropriate physical contact;
- boundary concerns;
- seeking unnecessary personal contact with a young person;
- inappropriate use of social media;
- repeated failure to follow safeguarding procedures.

Low-level concerns must be reported to the DSL.

The DSL will record and review concerns and consider whether:

- advice or training is required;
- management action is appropriate;
- the behaviour forms part of a pattern;
- the concern should be referred under the allegations procedure; or
- other safeguarding action is necessary.



Poor practice may include behaviour that breaches SNS's expected standards without necessarily constituting abuse. This could be, for example, walking around a school to find a bathroom without asking for permission from a teacher, on multiple occasions.

Where poor practice is identified, SNS may:

- provide advice or additional training;
- issue a management instruction;
- implement a supervision or monitoring arrangement;
- invoke the disciplinary procedure;
- record the concern as a low-level concern;
- undertake a safeguarding risk assessment; or
- escalate the matter if further information indicates a safeguarding risk.

Poor practice must never be dismissed simply because it does not initially appear to meet the threshold for abuse.

21. Professional Boundaries and Position of Trust



SNS prohibits romantic or sexual relationships between adults working for SNS and children with whom they have a professional relationship, including after a programme has concluded. SNS also prohibits:

- sexualised communication;
- grooming;
- inappropriate touching;
- seeking secrecy from a child;
- inappropriate gifts;
- excessive personal contact;
- inappropriate social-media relationships; and
- exploiting a position of authority, trust or influence.

Where behaviour may constitute a criminal offence or safeguarding risk, SNS will refer the matter to the appropriate external authority.

22. Safer Recruitment



SNS will use safer recruitment procedures proportionate to the role.

Recruitment processes may include:

- appropriate job descriptions;
- person specifications;
- safeguarding responsibilities within role descriptions;
- application forms;
- employment/volunteering history;
- consideration of unexplained gaps;
- appropriate references;
- identity verification;
- right-to-work checks where applicable;
- qualification checks where relevant;
- safeguarding questions during recruitment;
- safeguarding self-declaration;
- DBS checks where legally eligible and appropriate;
- consideration of overseas checks where relevant; and
- appropriate induction.

SNS will not rely on DBS checks alone to assess suitability.



SNS will determine whether a role is eligible for or requires a DBS check based on the duties and activities undertaken, rather than automatically applying the same level of check to every person.

Where legally eligible and appropriate, SNS may require an Enhanced DBS check and, where the role constitutes regulated activity, a Children's Barred List check.

SNS will review DBS eligibility whenever:

- a person's role changes;
- their duties change;
- a new programme is introduced;
- the law changes; or
- relevant DBS guidance changes.

SNS will renew DBS checks every three years maximum.

From 1 September 2026, the supervision exemption for regulated activity with children is removed. This means that some volunteers who previously were not considered to be undertaking regulated activity because they were supervised may fall within regulated activity and therefore become eligible for an Enhanced DBS check with Children's Barred List information.

This is particularly relevant to SNS's volunteers, speakers and others delivering educational activity to children.

SNS will follow current DBS eligibility and barring guidance when determining the appropriate check.

24. DBS Referrals



SNS will make a referral to the Disclosure and Barring Service where it has a legal duty to do so.

This may arise where a person is removed from regulated activity, dismissed or otherwise prevented from undertaking regulated activity because they have harmed or posed a risk of harm to a child or adult, and the statutory criteria for referral are met.

SNS will not treat every safeguarding-related dismissal as automatically requiring a DBS referral. The legal criteria will be considered in each case.

25. Volunteers and External Speakers

SNS recognises that external speakers and short-term volunteers can present safeguarding risks even where they have limited contact with children.

SNS will therefore:

- undertake appropriate safeguarding due diligence;
- establish the nature and frequency of their contact with children;
- determine whether DBS checks are legally available or required;
- obtain appropriate references or other assurance where proportionate;
- provide safeguarding expectations before participation;
- ensure appropriate supervision and boundaries;
- prohibit unsupervised contact where it is not appropriate;
- ensure concerns can be reported immediately; and
- remove or suspend a person from activity where safeguarding concerns arise.

SNS will not automatically assume that a short-term role is exempt from safeguarding checks.

26. Safeguarding Training



All SNS staff and volunteers who have contact with children or adults at risk will receive safeguarding training appropriate to their role.

Training will cover, as appropriate:

- recognising abuse and neglect;
- responding to disclosures;
- reporting procedures;
- professional boundaries;
- online safeguarding;
- exploitation;
- domestic abuse;
- bullying;
- radicalisation and Prevent;
- information sharing;
- safer working practices;
- allegations against adults;
- equality, inclusion and discrimination;
- safeguarding during trips and residential activities; and
- safeguarding specific to SNS's programmes.

The DSL will undertake appropriate specialist safeguarding training and maintain knowledge of current safeguarding guidance.

Training will be refreshed periodically and whenever there are significant changes to safeguarding law or guidance.

27. Safeguarding Risk Assessments

SNS will undertake proportionate safeguarding risk assessments for activities involving children or adults at risk.

Risk assessments should consider, as relevant:

- age and needs of participants;
- disability and accessibility;
- staff/participant ratios;
- one-to-one contact;
- travel;
- accommodation;
- overnight stays;
- online communication;
- photography;
- external speakers;
- physical environment;
- medical needs;
- emergency arrangements;
- missing child procedures;
- exploitation risks;
- behavioural risks;
- safeguarding concerns arising from the subject matter;
- contact with members of the public; and
- any specific risks associated with the programme.

Risk assessments will be reviewed following incidents or material changes.



The Student Leadership Programme and any residential or travel activity involving children will have additional safeguarding arrangements.

These will include, where applicable:

- parental/carer consent;
- emergency contact details;
- medical and accessibility information;
- appropriate staffing;
- DBS requirements;
- accommodation arrangements;
- rooming arrangements;
- supervision arrangements;
- travel arrangements;
- emergency procedures;
- missing child procedures;
- communication arrangements;
- rules regarding alcohol and substances;
- online communication;
- photography;
- contact with external individuals;
- safeguarding reporting arrangements; and
- arrangements for contacting parents/carers and statutory agencies.

A programme-specific safeguarding plan will be prepared for each residential or travel activity.

29. Working with Schools and Partner Organisations



SNS will work collaboratively with the safeguarding leads of schools and partner organisations.

Before delivering activities, SNS will seek to establish:

- the identity and contact details of the school's/organisation's safeguarding lead;
- emergency procedures;
- arrangements for responding to safeguarding concerns;
- any relevant site-specific safeguarding requirements;
- procedures for reporting incidents; and
- responsibilities of SNS and the host organisation.

SNS will cooperate with the host organisation but will retain responsibility for taking appropriate action in relation to concerns known to SNS.

Where necessary, SNS will contact statutory safeguarding agencies directly.

30. Information Sharing and Confidentiality

SNS will handle safeguarding information sensitively and securely.



Information will be shared on a need-to-know basis and in accordance with applicable data protection law.

However, confidentiality will not prevent appropriate safeguarding information sharing.

Where there is a safeguarding concern, staff should not assume that consent is always required before information can be shared.

SNS will consider:

- what information needs to be shared;
- why it needs to be shared;
- who needs to receive it;
- whether sharing is necessary and proportionate;
- the appropriate lawful basis;
- whether the information is special category data;
- whether sharing without consent is necessary to protect someone from harm; and
- whether informing the individual would create or increase risk.

The decision to share, or not to share, information should be recorded together with the rationale.

Current DfE information-sharing guidance specifically advises that consent should not automatically be treated as the default lawful basis for safeguarding information sharing and confirms that data protection law does not prevent justified safeguarding information sharing.

31. Record Keeping

SNS will maintain accurate safeguarding records.

Records should be:

- factual;
- objective;
- dated and timed;
- written as soon as reasonably possible;
- stored securely;
- accessible only to authorised individuals;
- retained in accordance with SNS's records retention policy and applicable law; and
- shared only where lawful and necessary.

Records should distinguish clearly between:

- facts;
- direct quotations;
- observations;
- information received from others;
- professional advice; and
- decisions and the reasons for those decisions.

Safeguarding records must not be altered or destroyed because an incident has become subject to investigation.

Where handwritten or interim notes are made, they should be retained in accordance with SNS's safeguarding record-keeping procedure.

32. Whistleblowing and Escalation



SNS encourages staff and volunteers to raise safeguarding concerns immediately.

No person will be disadvantaged for raising a genuine safeguarding concern in good faith.

Where an individual believes that:

- the DSL has not acted appropriately;
- a senior member of staff is implicated;
- a concern has not been taken seriously; or
- safeguarding procedures have not been followed,

they should escalate the concern to the Executive Director or Chair of Trustees.

Where necessary, concerns may be raised directly with the relevant statutory safeguarding agency, police, LADO, DBS or Charity Commission.

SNS's Whistleblowing Policy should be read alongside this policy.

33. Allegations and Investigations



A safeguarding allegation may result in several separate processes, including:

- a criminal investigation;
- a children's or adult safeguarding investigation;
- a LADO process;
- a DBS process;
- an internal disciplinary investigation;
- a professional regulatory investigation; and/or
- a Charity Commission serious incident process.

These processes may run concurrently.

SNS will not undertake its own investigation in a way that could compromise a police or safeguarding investigation.

SNS will seek appropriate external advice before interviewing an alleged perpetrator or undertaking investigative activity where a safeguarding allegation has been made.

34. Suspension and Management Action



Where a safeguarding allegation is made against a member of staff or volunteer, SNS will consider whether any immediate measures are necessary to protect children or adults at risk.

These may include:

- temporary removal from contact with children;
- changes to duties;
- increased supervision;
- temporary suspension;
- restriction of access to SNS systems;
- exclusion from events or programmes; or
- other proportionate protective measures.

Suspension will not be automatic and will be considered on a case-by-case basis, taking account of safeguarding advice, employment law and procedural fairness.

35. Supporting Those Affected



SNS recognises that safeguarding incidents can have significant effects on:

- children;
- adults at risk;
- parents and carers;
- staff;
- volunteers;
- speakers;
- witnesses; and
- the wider SNS community.

Where appropriate, SNS will signpost or provide access to suitable support.

Support will be offered without prejudicing safeguarding or criminal investigations.

36. Historical or Non-Recent Allegations

SNS will take allegations concerning historical abuse seriously.

Solutions Not Sides- Safeguarding Policy



A person making an allegation about abuse that occurred in the past will be listened to and supported.

The DSL will consider:

- whether the alleged perpetrator currently has access to children or adults at risk;
- whether other people may be at risk;
- whether a referral to police or social care is appropriate;
- whether a LADO referral is required; and
- whether DBS referral criteria are met.

SNS will not dismiss an allegation because the alleged incident occurred some time ago.

37. Serious Incidents and Charity Commission



Where a safeguarding incident may constitute a serious incident for charity regulatory purposes, SNS will consider whether a Serious Incident Report to the Charity Commission is required.

The Board of Trustees retains responsibility for ensuring appropriate reporting.

SNS will follow the Charity Commission's current Serious Incident Reporting guidance and will maintain an internal record of decisions and actions.

The Charity Commission states that trustees are responsible for identifying and reporting serious incidents where the reporting criteria are met.

38. Equality, Diversity and Inclusion

SNS recognises that safeguarding risks may be experienced differently depending on an individual's circumstances.

SNS will not discriminate on the basis of protected characteristics and will take reasonable steps to ensure that safeguarding arrangements are accessible.

Staff should consider additional communication or support needs, including:

- disability;
- language;
- cultural considerations;
- religious or belief considerations;
- neurodiversity;
- communication difficulties;
- age;
- sexuality;
- gender identity;
- trauma; and
- other individual circumstances.

Safeguarding decisions must be based on the person's welfare and circumstances and must not rely on stereotypes.

39. Children and Young People Participating in SNS Peace Education

SNS recognises that the subject matter of its educational work may involve discussion of conflict, violence, discrimination, identity, religion, politics, trauma and experiences of harm.

Staff should consider the potential emotional and safeguarding impact of such discussions.

SNS will:

- establish appropriate ground rules;
 - promote respectful discussion;
 - avoid exposing participants unnecessarily to graphic or distressing material;
 - respond appropriately if a participant becomes distressed;
 - allow appropriate breaks or support;
 - report safeguarding disclosures arising during sessions;
 - challenge discriminatory or abusive behaviour;
 - maintain professional boundaries; and
 - ensure that safeguarding concerns arising from discussions are not dismissed as merely political or educational debate.
-
- Observe the audience for any signs of distress or upset. If a facilitator or tour assistant notices these arising in individuals or groups of students, they will not identify the student to the rest of the group. As soon as possible, the teacher in the room needs to be made aware so they can take the appropriate steps. This can be done by either:
 - The tour assistant noticing the student and telling the teacher
 - The facilitator notifying the tour assistant and the tour assistant telling the teacher
 - The facilitator going straight to the teacher, if it's at a natural pause point in the session
 - If a student is extremely distressed and showing physical signs of discomfort such as hyperventilating, the facilitator must pause the session to get the teacher as a matter of urgency.

Procedure for concerns arising later



If a teacher contacts SNS after we have left the school to raise an issue or concern that has been brought up by a student or teacher, please follow this procedure:

- Bring up the session notes from the tour assistant and facilitator
- Set up a call with the teacher as soon as possible, listen, and take notes
- If the teacher has an upset student, consider pointing them towards resources such as emotions in conflict
- If the teacher has a student with a safeguarding complaint, assure the teacher we take these seriously and will investigate the complaint
- Follow the investigation procedure including informing the board

40. Monitoring, Review and Learning



SNS will review safeguarding arrangements regularly.

The DSL will monitor:

- safeguarding concerns;
- low-level concerns;
- training;
- DBS compliance;
- safeguarding risk assessments;
- incidents;
- referrals;
- lessons learned;
- feedback from children and young people where appropriate; and
- changes in legislation and guidance.

Following a significant safeguarding incident, SNS will consider whether a formal review is necessary.

The purpose of review will be to identify learning and improve safeguarding practice rather than simply identify individual blame.

41. Policy Review

This policy will be reviewed at least annually and sooner where:

- legislation changes;
- statutory guidance changes;
- SNS introduces a new programme;
- safeguarding risks materially change;
- a serious safeguarding incident occurs;
- learning identifies a weakness in the policy; or
- trustees or the DSL determine that a review is necessary.

The next scheduled review is:

26 August 2027 but it should be updated throughout the year if any safeguarding legislation is changed, updated, or created.

Appendix 1 – Immediate Safeguarding Action

If someone is in immediate danger

- Call 999
- Ensure immediate safety.
- Obtain medical assistance where necessary.



- Inform the DSL as soon as possible.

If someone discloses abuse or a safeguarding concern

- Stay calm.
- Listen.
- Take them seriously.
- Do not promise secrecy.
- Explain that you may need to share information to keep them safe.
- Do not investigate.
- Do not ask leading questions.
- Ask only necessary open questions to clarify immediate safety.
- Record their words accurately.
- Record what you observed.
- Contact the DSL/Deputy DSL immediately.
- Follow the DSL's advice regarding referral.
- Do not assume someone else will report the concern.

Appendix 2 – Safeguarding Contacts

SNS Designated Safeguarding Lead

Name: Jess Brandler

Telephone: 07900323676

Email: jess@sns.space

SNS Deputy DSL

Name: Miriam Tomusk

Telephone: +44 7999 343327

Email: miriam@sns.space



Executive Director

Name: Sharon Booth

Telephone: +44 7835 141010

Email: sharon@sns.space

Chair of Trustees

Name: Gareth Stapelton

Telephone: +1 (437) 351-0771

Email: gareth@sns.space

Appendix 3 – Related SNS Policies

This policy can be read alongside:

- SNS Privacy Policy;
- SNS Complaints Policy;
- SNS Speaker Selection and Management Policy;
- SNS Equal Opportunities Policy;
- SNS Health and Safety Policy;
- SNS Disciplinary Policy;
- SNS Harassment and Bullying Policy;
- SNS Partnership Policy;
- SNS Drugs and Alcohol Policy;
- SNS Smoking Policy;
- SNS Whistleblowing Policy;
- SNS Data Protection/Information Security Policy;
- SNS Code of Conduct; and
- any programme-specific risk assessments and safeguarding procedures.
- Appendix 4 – Key External Guidance

SNS will maintain links to current versions of relevant guidance rather than reproducing statutory guidance within this policy.

Key sources include:

- Working Together to Safeguard Children 2026;
- Keeping Children Safe in Education 2026;
- Care and Support Statutory Guidance;



- Disclosure and Barring Service guidance on regulated activity and DBS checks;
- Department for Education information-sharing guidance;
- Charity Commission safeguarding guidance;
- Charity Commission Serious Incident Reporting guidance; and
- relevant local safeguarding partnership procedures.

Appendix 2 SNS's Child Protection Flow Chart

