

c21 Theatre Company

Safeguarding Children and Adults at Risk

Policy and Procedures

Updated and legally/guidance reviewed: 12 August 2026

Applies to: trustees, employees, freelancers, volunteers, contractors, artists, facilitators, programme participants and anyone acting on behalf of c21 Theatre Company. Primary jurisdiction: Northern Ireland.

Document control

Policy owner: Board of Trustees / Artistic Director

Operational safeguarding leads: Designated Safeguarding Officer (DSO) and Adult Safeguarding Champion (ASC)

Approval: Board of Trustees

Effective date: 12 August 2026

Next scheduled review: August 2027, and earlier where legislation, statutory guidance, local safeguarding procedures or organisational practice changes.

This policy supersedes the 2023 version. It should be read with c21's disciplinary and grievance, complaints, whistleblowing, health and safety, data protection/privacy, equality and risk-assessment arrangements.

1. Statement of intent

c21 Theatre Company is committed to safeguarding and promoting the welfare of every child and adult at risk with whom it comes into contact. We will act to prevent and respond to abuse, neglect, exploitation, discriminatory treatment, harmful sexual behaviour, online harm and other safeguarding risks.

Safeguarding is everyone's responsibility. Staff and volunteers must act on concerns; they must not investigate allegations themselves. The welfare, safety, dignity, voice and best interests of the child or adult at risk are central to

decisions, while recognising that adults have rights to autonomy, choice and participation.

c21 works within the Northern Ireland safeguarding framework. The principal child-safeguarding framework is Co-operating to Safeguard Children and Young People in Northern Ireland, which applies across the voluntary and community sectors. Adult safeguarding is governed by the Department of Health framework Adult Safeguarding: Prevention and Protection in Partnership. The policy also takes account of current AccessNI/DBS arrangements and UK data-protection law.

2. Scope and definitions

Child: a person under 18 years of age.

Adult at risk: c21 uses this term in the Northern Ireland safeguarding context for an adult whose circumstances may place them at increased risk of harm, abuse, exploitation or neglect and who may need support to protect themselves. Staff must not wait for a formal service classification before acting on a safeguarding concern.

Adult in need of protection: where an adult is experiencing, or is at risk of, harm and protective intervention is required, staff should seek advice/referral through the relevant Health and Social Care Trust and follow regional adult safeguarding procedures.

Safeguarding includes prevention, early identification, proportionate response, protection from harm, promotion of welfare, support, information sharing and learning. Harm may occur in person, online, within families, peer groups, organisations or wider communities.

Abuse may be physical, sexual, emotional/psychological, neglectful, financial/material, discriminatory, organisational/institutional, exploitative or online. The list is not exhaustive.

Harmful sexual behaviour (HSB) means sexual behaviour by a child or young person that is developmentally inappropriate and/or harmful or abusive to themselves or others. Concerns about HSB must be treated as safeguarding concerns and not dismissed as 'normal behaviour'.

3. Safeguarding principles

- Safety and welfare come first, while respecting rights, dignity, identity and participation.
- Listen to children and adults at risk and take what they say seriously.
- Use a trauma-informed, anti-discriminatory and inclusive approach; Discriminatory abuse involves abuse based on a person's race, gender, sexuality, disability, religious and/or political beliefs and can take the form of harassment, slurs, or similar mistreatment.
- Do not promise secrecy. Explain, in an age- and capacity-appropriate way, when information may need to be shared to protect someone.
- Share information lawfully, proportionately and without unnecessary delay when needed to safeguard a person.
- Do not investigate allegations or conduct repeated questioning. Preserve evidence and refer to the appropriate safeguarding or law-enforcement agency.
- Work in partnership with parents/carers and host organisations where this is safe and appropriate. A parent/carer must not be informed where doing so could increase risk or prejudice a safeguarding response.
- Safeguarding concerns take priority over routine work.
- People who raise genuine concerns must be supported and protected from retaliation.
- A person's disability, communication needs, culture, language, age, sex, gender, sexuality, religion or belief must not reduce the quality of safeguarding response.

4. Roles and responsibilities

Board of Trustees: ensures governance, resources, accountability, policy approval and oversight; receives assurance on training, safer recruitment, incidents, referrals, complaints and learning.

Artistic Director: ensures implementation across the company, safe commissioning and programme delivery, and that safeguarding is embedded in contracts and project planning.

Designated Safeguarding Officer (DSO): leads on child safeguarding concerns, supports staff, maintains safeguarding records, makes/coordinates referrals and ensures escalation where required.

Adult Safeguarding Champion (ASC): leads on adult safeguarding concerns and supports proportionate, person-centred responses and referrals under Northern Ireland adult safeguarding arrangements.

All staff, freelancers and volunteers: follow this policy and the Code of Conduct; report concerns immediately; record accurately; maintain professional boundaries; attend required training; cooperate with safeguarding enquiries.

No c21 worker has authority to conduct a safeguarding investigation. External statutory agencies determine investigative steps.

5. Reporting a safeguarding concern – immediate procedure

If someone is in immediate danger, call 999. Do not delay emergency action to contact c21's safeguarding leads.

As soon as possible, tell the DSO or ASC. If the concern involves the DSO, report to the ASC; if it involves the ASC, report to the DSO. If both are implicated or neither is available, contact the relevant Health and Social Care Trust safeguarding service and/or PSNI as appropriate.

For child protection concerns, contact the relevant Health and Social Care Trust Gateway/children's social work service. For adult safeguarding concerns, contact the relevant Trust adult safeguarding service. Follow the current regional contact arrangements in Appendix 1 rather than relying on old numbers.

If a crime may have occurred, or there is an immediate threat, contact PSNI. Emergency: 999. Non-emergency: 101.

Do not delay a referral because you are waiting for internal approval. The organisation's safeguarding leads must support and coordinate action, not create a barrier to statutory referral.

Record the concern as soon as practicable, preferably the same day. The record must be factual, dated and timed, identify who was present, preserve the person's own words where possible, state what action was taken, and distinguish fact from opinion.

Only share information with those who need it for safeguarding, care, investigation, legal compliance or organisational governance. Do not discuss cases informally or on social media.

6. Responding to a disclosure

- Stay calm and listen.
- Thank the person for telling you and reassure them that they have done the right thing.
- Do not promise confidentiality or secrecy.
- Do not ask leading, probing or repeated questions. Use only minimal clarification necessary to establish immediate safety and what needs to be passed on.
- Do not confront the alleged perpetrator or attempt to mediate.
- Explain what you will do next and who you may need to tell.
- Consider immediate medical, physical, emotional and practical safety needs.
- Write the record promptly, using the person's words where possible, and report it to the DSO/ASC or statutory agency.

7. Referrals and information sharing

The DSO/ASC should consider the person's wishes, age, capacity, communication needs, immediate safety, risk to others, seriousness and nature of the concern, possible criminality, and whether another agency has statutory responsibility.

For adults, respect autonomy and choice wherever possible. However, consent is not an absolute bar to sharing information where there is a serious risk of harm, risk to others, a crime, a legal requirement, or another lawful safeguarding basis. The rationale for overriding a person's wishes must be recorded.

For children, the child's welfare is paramount. Parents/carers should be involved where safe and appropriate but must not be contacted if this could place the child at further risk or compromise a safeguarding response.

Information sharing must be lawful, fair, necessary, proportionate, accurate and secure. Safeguarding information can be shared without consent where there is a lawful basis, and it is necessary to protect a child or adult at risk. Do not use

data-protection law as a reason to withhold information that should lawfully be shared.

The Data (Use and Access) Act 2025 has amended UK data-protection law; c21 will follow the current UK GDPR, Data Protection Act 2018 as amended, DUAA 2025, PECR and current ICO guidance. The policy will be updated as regulatory guidance changes.

8. Allegations or concerns about a member of staff, freelancer, volunteer or trustee

Any concern that a person working for or on behalf of c21 may have harmed a child/adult at risk, may pose a risk of harm, or may have behaved in a way that raises safeguarding concerns must be reported immediately to the DSO/ASC and, where appropriate, the relevant statutory safeguarding agency and PSNI.

The person concerned must not be allowed to influence the handling of the allegation. Appropriate interim measures may include changes to duties, supervision, restricted access or suspension where lawful and proportionate. Suspension is not a finding of guilt.

c21 will not undertake an internal safeguarding investigation that could prejudice police or social-work enquiries. Any employment/disciplinary investigation must be coordinated with the relevant statutory agencies.

Where the legal conditions are met, c21 will make a referral to the Disclosure and Barring Service (DBS). A DBS referral duty can apply even where a referral has also been made to a safeguarding authority, professional regulator or police.

If a concern is about a safeguarding lead, the alternative lead or the Board Chair must receive it. If the concern involves both safeguarding leads or the Board Chair, seek independent external safeguarding/legal advice and contact the relevant Trust and/or PSNI.

9. Safer recruitment, AccessNI and barring

c21 will assess every role before recruitment to determine the safeguarding risk, whether the role is regulated activity, and the appropriate AccessNI level. A

check is not a substitute for safer recruitment, references, interview, identity verification, right-to-work checks where applicable, role-specific risk assessment and induction.

Enhanced AccessNI checks with barred-list checks must only be requested where the role is eligible. c21 will not adopt a blanket rule that every person who has any contact with children or adults at risk automatically requires an enhanced barred-list check.

c21 will review its role descriptions and AccessNI eligibility before 1 September 2026. From that date, amendments to the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 remove the supervision exemption for certain frequent child-facing activities. Workers and volunteers who frequently teach, supervise, instruct or care for children may therefore fall within regulated activity even when supervised.

AccessNI certificates and vetting information will be handled securely and only used for lawful safeguarding/recruitment purposes. c21 will not retain full disclosure certificates longer than necessary and will follow current AccessNI rules.

Where a person is removed from regulated activity and the legal criteria for a DBS referral are met, c21 will make the required referral and keep a record of the decision and evidence.

10. Training, induction and supervision

All staff, freelancers, volunteers and trustees whose work may bring them into contact with children or adults at risk must receive safeguarding induction before or at the start of their role, with any restrictions needed until induction is complete.

c21 standard: safeguarding refresher training will normally be completed annually, with additional training according to role and risk. This replaces the 3-year refresher cycle in the 2023 policy.

Training must cover recognising abuse and neglect; responding to disclosures; reporting and recording; online safety; harmful sexual behaviour; exploitation; domestic abuse and coercive control where relevant; equality and

discrimination; professional boundaries; safer recruitment; information sharing; photography/media; and whistleblowing.

Facilitators working with children or adults at risk must receive role-specific guidance on physical contact, emotional content, personal disclosures, lone working, transport, changing/toilet arrangements, digital communication and use of photographs/video.

The DSO/ASC will maintain a training register and identify gaps, expiry dates and role-specific needs.

11. Professional boundaries and code of conduct

c21 workers must model respectful, professional behaviour and maintain clear boundaries. Work should normally take place in observable/auditable settings and with appropriate host-organisation supervision.

Workers must not form private or secret relationships with participants, add children/young people to personal social-media accounts, arrange private meetings outside organised activity without appropriate authorisation, offer inappropriate gifts, use sexualised language, engage in humiliating or discriminatory conduct, or use physical contact that is unnecessary, unsafe or inappropriate.

Physical contact must be proportionate to the activity, culturally and individually appropriate, explained in advance where possible, and stopped if the participant indicates discomfort.

No worker should transport a child in a personal or company vehicle unless this is specifically risk-assessed, authorised and compliant with safeguarding and insurance arrangements.

Workers must never promise secrecy. They must report boundary concerns and low-level concerns about colleagues as well as serious allegations.

12. Online safety, digital communication and social media

Online safeguarding is part of safeguarding and must be treated with the same seriousness as an in-person concern. Risks include grooming, sexual

exploitation, coercion, bullying, harassment, image-based abuse, harmful content, impersonation, doxxing, inappropriate direct messaging and other technology-facilitated abuse.

c21 will use organisational accounts and approved communication channels for work with participants. Staff should not use personal accounts to communicate privately with children or young people.

Do not request, store, forward or copy indecent images of children. If an indecent image is encountered, do not download or circulate it; preserve only the minimum information necessary and seek immediate advice from the DSO/ASC and PSNI as appropriate.

Social-media content must not identify or expose participants unnecessarily, disclose confidential safeguarding information, or undermine professional boundaries. Concerns received through social media must be captured and managed through the safeguarding procedure.

13. Photography, filming and recording

Images, video and audio involving identifiable participants are personal data. c21 will explain why recording is taking place, how it will be used, who will receive it, how long it will be kept and how people can raise concerns.

Participation in promotional recording should not be presented as a condition of access to an activity unless the activity genuinely depends on recording and this has been explained in advance.

For children, c21 will use an appropriate consent/permission process and will consider the child's views, age and understanding as well as parental responsibility and any safeguarding restrictions. Where a child is subject to a court order, care arrangement or specific safeguarding restriction, recording must not proceed until the restriction is understood and authorised.

Do not publish surnames, addresses, school details, live locations or other information that could create an unnecessary safeguarding risk. Do not tag children or young people into promotional posts.

Any safeguarding concern arising from photography or filming must be reported immediately.

14. Risk assessment and safer programme delivery

A proportionate safeguarding risk assessment must be completed before activities involving children or adults at risk. It should consider the venue, staffing, supervision ratios, lone working, transport, changing/toilet arrangements, accessibility, medical needs, physical contact, equipment, emotional content, online activity, photography, collection arrangements and emergency procedures.

Where c21 works in a school, youth organisation, community setting or venue, c21 will agree a named safeguarding contact and clarify which organisation is responsible for supervision, first aid, emergency contact, participant information and safeguarding referrals.

c21 may pause or cancel an activity where safeguarding arrangements are inadequate or unsafe.

15. Confidentiality, records and data protection

Safeguarding records are confidential but not secret. They may need to be shared with statutory agencies, regulators, insurers, legal advisers or other people who have a lawful need to know.

Records must be accurate, objective, dated and timed, stored securely, access-controlled and retained only for as long as necessary under c21's retention schedule and legal obligations.

c21 will process personal data under the UK GDPR and Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025, and other applicable law. c21 will apply data minimisation, purpose limitation, accuracy, storage limitation, security and accountability.

Where processing is likely to create a high risk to individuals, c21 will complete a Data Protection Impact Assessment before processing begins. Safeguarding and children's data require particular care.

Personal data breaches must be reported immediately to the Data Protection Representative. c21 will assess whether notification to the ICO or affected people is required and will comply with current statutory time limits and ICO guidance.

c21 will maintain appropriate privacy notices and a data-retention schedule. The previous policy's fixed statement that every subject access request must always be answered within one month is replaced by the current legal framework, including any applicable changes under the DUAA 2025.

16. Whistleblowing and speaking up

Anyone working for or with c21 may raise a safeguarding concern if they believe a child or adult at risk is unsafe, if safeguarding procedures are not being followed, or if a person in authority is failing to act.

Concerns should normally be raised with the DSO/ASC, Artistic Director or Board Chair. If the concern involves one of them, use the alternative route. If internal routes are unsafe or ineffective, concerns may be raised with the relevant Health and Social Care Trust, PSNI, regulator or other appropriate authority.

c21 will not victimise a person for raising a genuine safeguarding concern. The existing whistleblowing policy must be read consistently with applicable Northern Ireland whistleblowing law and current guidance; it must not be used to discourage a safeguarding referral.

17. Complaints, learning and review

Safeguarding concerns, complaints and incidents will be reviewed for learning as well as immediate protection. c21 will identify patterns, repeat concerns, environmental risks, training needs and policy changes.

After serious incidents, c21 will consider whether an internal debrief, safeguarding review, referral to a statutory review process, or independent advice is required.

This policy will be reviewed at least annually and whenever there is a significant change in law, statutory guidance, local safeguarding arrangements, organisational activity or a serious incident.

Appendix 1 – Current safeguarding contacts

Emergency: PSNI / ambulance / fire – 999.

PSNI non-emergency: 101.

Child protection: contact the relevant Health and Social Care Trust Gateway/children's social work service immediately. Current Trust contact information must be checked before each annual policy review.

Regional Emergency Social Work Service (out of hours): 028 9504 9999.

Belfast HSC Trust Gateway: 028 9050 7000.

Northern HSC Trust Gateway: 0300 1234 333.

Southeastern HSC Trust Gateway: 0300 1000 300.

Southern HSC Trust Gateway: 0800 7837 745.

Western HSC Trust Gateway: 028 7131 4090.

Adult safeguarding: use the relevant HSC Trust adult safeguarding service and current regional contact directory; verify contact details at each annual review.

NSPCC Helpline (advice): 0808 800 5000.

AccessNI: use current official AccessNI guidance and application routes.

DBS referrals: organisations with regulated activity may have a legal duty to refer; use current DBS referral guidance and seek advice where eligibility or duty is uncertain.

Appendix 2 – c21 safeguarding leads

Designated Safeguarding Officer: Trudy Harkness Trustee –
t.harkness@ulster.ac.uk - 07960737624

Adult Safeguarding Champion: Stephen Kelly, Creative Director –
c21theatre@gmail.com – 07752 089400.

If a safeguarding lead is unavailable, use the alternative lead. If both are implicated, contact the Board Chair and the relevant statutory safeguarding agency/PSNI.

Appendix 3 – Safeguarding incident/disclosure record

Record: date/time; location; person at risk; reporter; people present; factual description; exact words used where possible; immediate safety actions; advice sought; referrals made; who was informed and why; consent/wishes/capacity considerations where relevant; follow-up actions; DSO/ASC decision; date/time of all actions.

The form must not be used to conduct an investigation. Attach contemporaneous notes and preserve relevant evidence securely.

Appendix 4 – Quick response checklist

- Make the person safe; call 999 if necessary.
- Listen, reassure and do not promise secrecy.
- Do not investigate or ask leading questions.
- Tell the DSO/ASC immediately, or the relevant statutory service if neither is available.
- Contact the relevant HSC Trust for child/adult safeguarding advice or referral.
- Contact PSNI where a crime, immediate danger or police response is indicated.
- Record facts, exact words, actions and decisions promptly.
- Share only with those who need to know for safeguarding or lawful organisational purposes.
- Consider whether AccessNI/DBS, regulatory or employment action is required.
- Arrange follow-up, support and learning.

Appendix 5 – Host organisations: minimum expectations

Before a project, c21 should confirm the host organisation's safeguarding lead/contact, supervision arrangements, emergency arrangements, participant numbers/ages, relevant additional needs and any known safeguarding restrictions that need to be shared lawfully.

The host organisation remains responsible for the supervision of its participants unless a different written arrangement is agreed and safely risk-assessed.

c21 workers will not be left alone with children unless the activity and role have been specifically assessed and the arrangements are lawful, safe and consistent with AccessNI/regulated-activity requirements.

c21 may stop an activity if safeguarding, supervision, facilities or working conditions are unsafe.

Appendix 6 – Updated Code of Conduct

- Treat everyone with dignity, patience and respect.
- Use age-appropriate language and behaviour.
- Keep professional boundaries and avoid secretive communications.
- Work in observable/auditable settings where practicable.
- Use only appropriate physical contact, with consent/assent where possible.
- Never hit, threaten, humiliate, sexualise, bully or discriminate against a participant.
- Never promise secrecy.
- Never add children/young people to personal social-media accounts or arrange private contact outside agreed activity.
- Do not transport participants without specific authorisation and risk assessment.
- Do not take or share photographs/video except under the agreed recording process.
- Do not use alcohol or drugs in a way that compromises safe work.
- Report low-level concerns and poor practice as well as serious safeguarding concerns.

Appendix 7 – Photography and media permission checklist

- Purpose and intended use explained.
- Who will receive/share the material identified.
- Privacy and safeguarding risks considered.
- Appropriate permission/consent process completed.
- Child's views and any safeguarding restrictions considered.

- No unnecessary identifying information published.
- Storage, retention and deletion arrangements documented.
- Requests to withdraw or restrict use are routed to the appropriate data-protection/safeguarding lead.

Appendix 8 – Risk assessment template

Activity/project:

Venue:

Date:

Responsible person:

Participants and age range:

Safeguarding lead/contact:

Hazard/risk:

Who may be harmed:

Existing controls:

Further action required:

Responsible person and deadline:

Residual risk and approval:

Review date:

Appendix 9 – Legal and guidance framework reviewed for this edition

Children (Northern Ireland) Order 1995.

Safeguarding Board Act (Northern Ireland) 2011 and related arrangements.

Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, as amended.

Protection of Freedoms Act 2012, as applicable.

Co-operating to Safeguard Children and Young People in Northern Ireland – Department of Health; page last updated 1 May 2026.

Adult Safeguarding: Prevention and Protection in Partnership – Department of Health, Northern Ireland.

Regulated Activity in relation to Children – Department of Health, Northern Ireland; updated 11 August 2026, including the 1 September 2026 removal of the child supervision exemption.

Current AccessNI/DBS guidance, including ‘DBS legal duty to refer’ guidance updated 23 April 2026.

UK GDPR and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025; all data-protection provisions of DUAA relevant to organisations are now in force, with ICO guidance updated 19 June 2026.

Northern Ireland-specific practice takes precedence over England-only guidance. England’s Working Together to Safeguard Children 2026 was reviewed as a current UK government comparator but is not the governing child-safeguarding framework for c21’s Northern Ireland operations.

Appendix 10 – Revision notes from the 2023 policy

Replaced the former 3-year policy review cycle with annual review plus trigger-based review.

Replaced the blanket statement that all staff/volunteers with regular contact automatically require enhanced AccessNI checks with role-by-role eligibility assessment.

Added the 1 September 2026 change removing the supervision exemption for relevant frequent child-facing regulated activity in Northern Ireland.

Added explicit DBS referral duties and separation between safeguarding referral, disciplinary action and statutory investigation.

Strengthened online safety, harmful sexual behaviour, exploitation, professional boundaries, low-level concerns, anti-discriminatory practice and whistleblowing.

Updated the data-protection section to reflect the Data (Use and Access) Act 2025 and current ICO guidance.

Changed routine safeguarding refresher training from every three years to an annual c21 standard, with additional role-specific training.

Updated the safeguarding contact section to direct staff to current HSC Trust arrangements and annual verification rather than relying on a static list alone.