

Eden's Trust Safeguarding Policy & Procedures

(Children, Young People & Adults at Risk)

Version Control

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Table of Contents

Section	Content	Page
1	Statement of Intent & Scope	Pg 2
2	Our Safeguarding Commitment	Pg 2-3
3	Legal & Statutory Framework	Pg 3
4	Principles Underpinning this Policy	Pg 3-4
5	Safeguarding Culture	Pg 4
6	Trauma-Informed Safeguarding Approach	Pg 4-5
7	Roles & Responsibilities	Pg 5
8	Safer Recruitment & Code of Conduct	Pg 5-6
9	Training, Supervision & Staff Wellbeing	Pg 6-7
10	Safeguarding in Schools & Partner Settings	Pg 7
11	Confidentiality & Information Sharing	Pg 7-9
12	Definitions	Pg 9-10
13	Types of Abuse & Safeguarding Concerns	Pg 10-11
14	Safeguarding Procedures: The Four R's Framework	Pg 12-14
15	Allegations Against Staff and Volunteers	Pg 14-16
16	Whistleblowing and Low-Level Concerns	Pg 16-17
17	Breaches of Policy and Disciplinary Action	Pg 17-19
18	Review and Monitoring	Pg 19
19	Key Safeguarding Contacts	Pg 19
Appendix A	Recognising Signs of Abuse	Pg 20
Appendix B	How to Recognise, Respond, Report and Record Safeguarding Concerns	Pg 21
Appendix C	Eden's Trust Safeguarding Flow Chart- How to report a disclosure/concern	Pg 22



1. Statement of Intent & Scope

Eden's Trust provides emotional and therapeutic bereavement support to children, young people, parents and adults who have experienced the death of a child or sibling. This includes:

- Drop-in support groups
- One-to-one counselling
- Family and couples counselling
- Sibling support
- School-based work
- Community-based bereavement services

Eden's Trust recognises that bereavement can significantly increase vulnerability. People accessing our services may experience emotional distress, trauma, mental health difficulties, isolation or reduced capacity to keep themselves safe.

Eden's Trust is committed to safeguarding and promoting the welfare of children and adults at risk. We expect all staff, volunteers, and partners (schools, youth organisations, etc.) to share this commitment.

We believe that all children, young people and adults at risk have the right to protection from mistreatment, abuse, violence and exploitation. We will protect all participants involved in our interventions equally and without discrimination.

Eden's Trust is committed to ensuring that young people and adults at risk, and their parents or carers (where applicable), are informed about this policy and associated procedures. This policy will be shared with partners we work with; however, partners remain responsible for their own safeguarding policies and procedures.

This policy sets out how Eden's Trust will safeguard:

- Children and young people
- Adults at risk
- Families accessing services
- Staff, counsellors and volunteers

This policy applies to:

- Trustees
- Paid staff
- Counsellors, Life Coaches and therapists
- Volunteers and anyone acting on behalf of Eden's Trust

2. Our Safeguarding Commitment

Eden's Trust believes:

- Safeguarding is everyone's responsibility
- The welfare of the child or adult at risk is paramount

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- All people have the right to be safe from harm, abuse and exploitation
- Safeguarding must be trauma-informed, compassionate and proportionate

We are committed to:

- Valuing and listening to those we support
- Creating emotionally and physically safe environments
- Recruiting safely and providing training and supervision
- Working in partnership with statutory agencies
- Sharing information appropriately to protect people from harm

3. Legal & Statutory Framework

These Safeguarding Policies and Procedures are underpinned by relevant UK legislation, statutory guidance and best practice frameworks. Eden's Trust is committed to fulfilling its legal and moral duty to safeguard and promote the welfare of children, young people and adults at risk.

This policy should be read in conjunction with Eden's Trust's Code of Conduct, Data Protection Policy, Equality and Diversity Policy and Whistleblowing Policy.

- **Children Act 1989 & 2004** – establishes the paramount importance of the child's welfare and places a duty on organisations to safeguard and promote the welfare of children.
- **Working Together to Safeguard Children (2025)** – sets out how organisations and individuals should work together to safeguard and promote the welfare of children.
- **Keeping Children Safe in Education (2025)** – where applicable to Eden's Trust's work in educational settings.
- **Care Act 2014** – defines safeguarding duties in relation to adults at risk and sets out responsibilities for preventing abuse and neglect.
- **Prevent Duty Guidance (Counter-Terrorism and Security Act 2015)** – outlines the duty to have due regard to preventing people from being drawn into extremism and radicalisation.
- **Data Protection Act 2018 / UK GDPR** – governs the lawful handling, storage and sharing of personal and sensitive information.
- **Equality Act 2010** – ensures protection from discrimination and promotes inclusion and fairness in all safeguarding practices.

4. Principles Underpinning this Policy

Eden's Trust's safeguarding practice is guided by the following principles:

- **The welfare of the child or adult at risk is paramount.**
- **Safeguarding is everyone's responsibility** and concerns must be acted on without delay.
- **Early identification and intervention are essential** — no concern is too small to report.
- **We listen, take concerns seriously, and support people to speak up.**
- **We work in partnership with statutory agencies** to safeguard effectively.

- **Confidentiality is respected, but safety comes first** and information will be shared lawfully on a need-to-know basis.
- **We promote empowerment, dignity and choice** through trauma-informed, person-centred practice, while taking protective action where needed.

5. Safeguarding Culture

Eden's Trust promotes a safeguarding culture where concerns are raised early, taken seriously and acted upon without delay. We encourage professional curiosity, reflective practice and respectful challenge. Safeguarding is embedded in recruitment, induction, supervision and service delivery. Everyone connected with Eden's Trust is expected to model appropriate behaviour, maintain professional boundaries, and follow the Four R's framework.

6. Trauma-Informed Safeguarding Approach

Eden's Trust adopts a trauma-informed approach to safeguarding, recognising that individuals who have experienced bereavement, loss, or other adverse life events may be particularly vulnerable to harm.

We understand that trauma can:

- Heighten emotional sensitivity and distress
- Trigger past traumatic experiences
- Reduce emotional resilience and coping capacity
- Increase dependency on others for support
- Affect memory, concentration and decision-making
- Influence how individuals respond to authority, relationships and boundaries

This policy recognises that behaviours and reactions should be understood in the context of lived experience rather than viewed in isolation.

How we respond:

- Remain calm, supportive and non-reactive, ensuring individuals feel heard and safe
- Avoid judgement, blame or disbelief, and use respectful, non-leading language
- Offer choice and clarity wherever possible, helping individuals feel a sense of control
- Explain processes and next steps in a clear and age-appropriate way
- Prioritise safety while recognising the emotional impact of safeguarding actions
- Respect dignity, privacy and personal boundaries at all times
- Be mindful of cultural, spiritual and individual needs
- Recognise signs of trauma and distress and respond with sensitivity

Eden's Trust is committed to empowering children, young people and adults at risk by:

- Involving them, wherever appropriate, in decisions that affect them
- Listening to their views, wishes and concerns
- Supporting informed consent wherever possible
- Providing reassurance and emotional support during safeguarding processes

Balancing Care and Protection

While Eden's Trust seeks to promote choice, empowerment and autonomy, we recognise that protective action may be required where there is significant risk of harm. In such cases, safeguarding decisions will always prioritise safety while remaining respectful, proportionate and person-centred.

7. Roles and Responsibilities

Safeguarding is a shared responsibility across Eden's Trust. Clear roles and accountability are essential to ensure concerns are responded to appropriately, consistently and in line with this policy.

Board of Trustees

The Board of Trustees holds ultimate responsibility for safeguarding within Eden's Trust and will ensure that safeguarding is embedded in governance, strategy and organisational culture.

The Board of Trustees will:

- Ensure that Eden's Trust has an up-to-date and effective Safeguarding Policy and Procedures- approve and regularly review safeguarding policies and related procedures
- Ensure that appropriate safeguarding leadership arrangements are in place, including the appointment of a Designated Safeguarding Lead (DSL) and Deputy DSL
- Receive safeguarding reports and assurance that safeguarding systems are working effectively
- Ensure that safeguarding risks are identified, managed and monitored
- Promote a culture where safeguarding is taken seriously and concerns are acted upon

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead has operational responsibility for safeguarding within Eden's Trust and acts as the main point of contact for safeguarding concerns.

The DSL will:

- Maintain overall oversight of safeguarding practice and procedures
- Receive and manage safeguarding concerns and disclosures
- Make referrals to statutory agencies where required (Children's Social Care, Adult Social Care, Police, Prevent)
- Provide advice, guidance and support to staff, counsellors and volunteers
- Ensure safeguarding concerns are recorded accurately and stored securely
- Liaise with external agencies and participate in multi-agency working where appropriate
- Ensure safeguarding training is delivered and kept up to date
- Monitor patterns or repeated concerns and take appropriate action
- Escalate concerns to trustees where required

In the absence of the DSL, the Deputy DSL will assume these responsibilities.

8. Safer Recruitment and Code of Conduct

Eden's Trust is committed to safer recruitment practices that protect children, young people and adults at risk from harm by ensuring that those in positions of trust are suitable, competent and appropriately vetted.

The following safer recruitment measures are in place:

- Verification of **identity, legal right to work in the UK, and relevant qualifications or professional registrations** (where required) prior to appointment
- Receipt of **two satisfactory references** before any direct work with children begins
- **Enhanced DBS clearance** for all staff, counsellors and volunteers working directly or alone with children
- Ongoing DBS monitoring through **three-yearly renewal or the DBS Update Service**
- Inclusion of **safeguarding-specific questions** within recruitment and interview processes
- **Safeguarding induction and training** for all staff and counsellors working with children and young people
- Oversight of staff and volunteer **roles, responsibilities and contact with children**

Eden's Trust's **Code of Conduct** sets out clear expectations regarding professional boundaries, behaviour and ethical practice. The Code of Conduct applies to all staff, counsellors, volunteers, trustees and anyone acting on behalf of Eden's Trust and must be adhered to at all times.

Concerns about the conduct of colleagues must be reported in line with Eden's Trust's **Allegations Against Staff** and **Whistleblowing** procedures.

9. Training, Supervision and Staff Wellbeing

Eden's Trust is committed to ensuring that all staff, counsellors, therapists, coaches and volunteers are appropriately trained, supported and supervised to fulfil their safeguarding responsibilities safely and effectively.

Safeguarding Training

All staff and volunteers must:

- Complete safeguarding training relevant to their role
- Attend safeguarding updates and refresher training as required
- Understand and follow Eden's Trust Safeguarding Policy and Procedures and the Four R's framework
- Maintain professional boundaries and appropriate conduct at all times

Safeguarding training is designed to support trauma-informed, proportionate and reflective practice.

Supervision and Professional Support

Eden's Trust recognises that safeguarding and bereavement work can be emotionally demanding. Staff, counsellors and volunteers are expected to:

- Use supervision and line management support appropriately
- Seek guidance from the Designated Safeguarding Lead (DSL) when unsure
- Not manage safeguarding concerns alone
- Reflect on practice, boundaries and emotional impact
- Raise concerns about their own wellbeing or capacity to work safely

Supervision provides a space to support safe decision-making, professional resilience and ethical practice.

Staff Wellbeing

Eden's Trust is committed to safeguarding the wellbeing of staff and volunteers alongside those who access our services.

Where required, individuals will be supported to access additional guidance, supervision or wellbeing support to ensure that safeguarding responsibilities can be carried out safely and effectively.

Safeguarding includes protecting staff as well as children, young people and adults at risk.

10. Safeguarding in Schools & Partner Settings

When working in schools or partner organisations, Eden's Trust staff must follow the host organisation's safeguarding procedures and report concerns to the host DSL immediately. Eden's Trust's DSL must also be informed as soon as possible (and no later than 2 hours where practicable), and the concern recorded in line with Eden's Trust procedures.

Before commencing work in a school or partner setting, Eden's Trust team members must:

- Familiarise themselves with the host organisation's safeguarding policy and reporting procedures
- Identify the host organisation's Designated Safeguarding Lead (DSL)

If a safeguarding concern arises in a school or partner setting, staff must:

- Report the concern immediately to the host organisation's DSL in line with their procedures
- Inform Eden's Trust Designated Safeguarding Lead within 2 hours of disclosure/ concern
- Record the concern in accordance with Eden's Trust safeguarding procedures

If the concern involves an Eden's Trust staff member or volunteer, the Eden's Trust Allegations Against Staff procedure must be followed.

Where there is immediate risk of harm, emergency services must be contacted without delay.

Safeguarding responsibilities apply equally to face-to-face and online work carried out in school and partner settings.

11. Confidentiality and Information Sharing

Eden's Trust is committed to respecting the privacy and confidentiality of all children, young people and adults who access its services. We recognise that trust is essential in therapeutic and bereavement support relationships.

However, confidentiality is not absolute and must be balanced with the duty to safeguard individuals from harm.

Limits of Confidentiality

The limits of confidentiality will be clearly explained at the outset of all services and whenever appropriate thereafter. This includes informing individuals that information may need to be shared if:

- There is a concern that a child, young person or adult is at risk of harm
- A crime has been committed or may be committed
- There is a risk to the individual or to others
- The individual lacks capacity to make decisions about their own safety

Safeguarding concerns will always override confidentiality where safety is at risk.

Information Sharing Principles

Information will be shared:

- On a need-to-know basis only
- With appropriate professionals or agencies
- In a timely, proportionate and lawful manner
- In line with data protection legislation and statutory safeguarding guidance

Eden's Trust follows the principle that information sharing is essential to protect individuals from harm and to support effective safeguarding action.

Where possible and appropriate:

- Consent will be sought before sharing information
- Individuals will be informed about what information will be shared and with whom
- Their wishes and views will be taken into account

However, consent is not required where:

- There is a risk of serious harm
- A child or adult at risk may be unsafe
- A crime may have occurred
- Others may be at risk

Recording and Storage of Information

All safeguarding information will be:

- Recorded accurately and factually
- Stored securely and confidentially
- Kept separate from counselling or session notes
- Accessible only to authorised personnel (DSL, Deputy DSL, senior leadership where required)
- Retained in line with Eden's Trust data retention policies

Electronic and paper records will be protected in accordance with Eden's Trust Data Protection Policy and UK GDPR requirements.

Trauma-Informed Communication

When information needs to be shared, Eden's Trust will:

- Explain the reasons for sharing information clearly and sensitively
- Use age-appropriate and accessible language

- Offer reassurance and emotional support
- Seek to involve individuals in the process wherever possible
- Respect dignity and privacy at all times

Information sharing will be handled in a way that minimises distress and maintains trust while prioritising safety.

Staff Responsibilities

All staff, counsellors, therapists, coaches and volunteers must:

- Understand the limits of confidentiality
- Follow Eden's Trust information sharing procedures
- Not promise absolute confidentiality
- Report safeguarding concerns to the Designated Safeguarding Lead (DSL)
- Handle personal and sensitive data responsibly
- Complete data protection and safeguarding training as required

Any breach of confidentiality outside safeguarding requirements may be treated as a breach of this policy.

Key Principle

Eden's Trust believes that:

Sharing information appropriately is essential to safeguarding.

Protecting life and wellbeing takes priority over confidentiality.

12. Definitions

For the purposes of this policy, the following definitions apply:

Child / Young Person

A child or young person is defined as anyone under the age of 18 years, in accordance with the Children Act 1989 and 2004.

Children and young people may be vulnerable to abuse or neglect due to their age, dependency on adults, developmental stage, and life circumstances. Safeguarding responsibilities apply regardless of gender, ethnicity, disability, religion, sexual orientation or background.

Adult at Risk

An adult at risk is defined as a person aged 18 or over who:

- Has care and support needs (whether or not these are being met by local authority services), and
- Is experiencing, or is at risk of, abuse or neglect, and
- Is unable to protect themselves from that abuse or neglect due to their care and support needs.

This definition is taken from the Care Act 2014.

Eden's Trust recognises that vulnerability is not static and that adults may move in and out of risk depending on their circumstances. Factors that may increase vulnerability include, but are not limited to:

- Bereavement and loss
- Mental or physical ill health
- Disability or learning difficulties
- Social isolation
- Trauma or adverse life experiences
- Financial hardship
- Substance misuse
- Domestic abuse or coercive control

Bereavement in particular may increase vulnerability and risk, as individuals may experience emotional distress, reduced coping capacity, and increased reliance on others at a time of grief.

Safeguarding responses will always be proportionate, person-centred and respectful of an individual's rights, wishes and dignity, while prioritising safety where there is risk of harm.

13. Types of Abuse & Safeguarding Concerns

Safeguarding concerns may relate to a single incident or a pattern of behaviour and may occur in any setting, including family environments, community spaces, online platforms or organisational activities.

Abuse may be perpetrated by adults, peers, family members, professionals, or strangers.

Safeguarding concerns may include, but are not limited to, the following:

Physical Abuse

The intentional use of physical force that results in, or has the potential to result in, physical injury. This may include hitting, shaking, burning, poisoning, restraining, or misuse of medication.

Emotional / Psychological Abuse

Persistent emotional maltreatment that harms a person's emotional development or sense of self-worth. This may include humiliation, threats, intimidation, isolation, rejection, or controlling behaviour.

Sexual Abuse

Any sexual activity with a child or adult at risk without consent or capacity to consent. This includes non-contact abuse such as exposure to sexual content, sexual exploitation, grooming and online sexual abuse.

Neglect

The persistent failure to meet basic physical and/or psychological needs, resulting in serious impairment of health or development. This includes lack of supervision, inadequate nutrition, clothing, shelter or medical care.

Domestic Abuse & Coercive Control

A pattern of abusive behaviours used to control, manipulate or dominate another person within an intimate or family relationship. This can include physical, emotional, sexual, financial and psychological abuse.

Mental Health Crisis

Situations where an individual is experiencing severe emotional distress, psychosis, or thoughts of self-harm or suicide that place them at immediate or significant risk.

Self-Harm or Suicidal Ideation

Any expression or behaviour indicating that an individual is harming themselves or considering ending their life. All such disclosures must be treated as safeguarding concerns and responded to urgently and appropriately.

Radicalisation (Prevent)

Concerns that an individual is being drawn into extremist ideologies or activities that may place them at risk of harm or exploitation.

Child Sexual Exploitation (CSE)

A form of sexual abuse where a child is manipulated or coerced into sexual activity in exchange for something they need or want (such as attention, gifts, money or protection), often involving power imbalance.

Criminal Exploitation (including County Lines)

Where individuals are coerced or manipulated into committing crimes for the benefit of others, including drug trafficking, theft or violence.

Honour-Based Abuse

Abuse committed to protect or defend perceived family or community "honour", including violence, threats, restrictions on freedom, or coercion.

Forced Marriage

A marriage conducted without the full and free consent of one or both parties and involving pressure, threats or abuse.

Female Genital Mutilation (FGM)

A procedure involving partial or total removal of the external female genitalia for non-medical reasons. FGM is a criminal offence and a serious safeguarding concern.

Modern Slavery and Human Trafficking

The recruitment, movement or exploitation of individuals through coercion, deception or force for purposes such as labour exploitation, sexual exploitation or domestic servitude.

Online Abuse and Exploitation

Abuse that occurs via digital platforms, including grooming, sexual exploitation, harassment, bullying, coercion, or exposure to harmful content.

14. Safeguarding Procedures: The Four R's Framework

Eden's Trust uses the Four R's safeguarding framework **Recognise, Respond, Record and Refer** to ensure that all safeguarding concerns are managed consistently, safely and in line with statutory guidance and this policy.

This framework applies to all safeguarding concerns relating to children, young people and adults at risk and must be followed by all trustees, staff, counsellors, therapists, coaches and volunteers.

Following the Four R's framework ensures that:

- Individuals are supported and protected
- Concerns are handled consistently and lawfully
- Staff and volunteers are guided and safeguarded
- Eden's Trust fulfils its duty of care
- Safeguarding is everyone's responsibility.

14.1. RECOGNISE - Identifying Safeguarding Concerns

Safeguarding concerns may arise through:

- A direct disclosure from a child, young person or adult
- Observations of behaviour, appearance or emotional distress
- Information shared by a parent, carer or third party
- Changes in mood, attendance or engagement
- Online or digital activity
- Professional curiosity arising from something that does not feel right

Staff must remain alert to signs and indicators of abuse, neglect, exploitation or harm, including those related to bereavement and trauma, such as:

- Increased emotional distress or withdrawal
- Expressions of hopelessness, fear or suicidal thoughts
- Heightened dependency on staff or others
- Risk-taking or unsafe relationships
- Evidence of coercion, control or exploitation
- Sudden changes in behaviour or self-care

No concern is too small to report. Early identification can prevent harm from escalating.

14.2. RESPOND- Immediate and Trauma Informed Action

When a safeguarding concern or disclosure is identified, staff must respond in a calm, supportive and trauma-informed manner.

Staff must:

- Listen carefully and take the concern seriously

- Reassure the individual that they have done the right thing by speaking up
- Avoid judgement, shock or disbelief
- Use open and non-leading questions where clarification is needed
- Explain the limits of confidentiality and what will happen next
- Prioritise the safety and wellbeing of the individual
- Seek immediate medical or emergency help if there is a risk of serious harm

Staff must not:

- Promise confidentiality
- Investigate the concern themselves
- Ask probing or leading questions
- Confront an alleged perpetrator
- Delay reporting the concern

Where there is immediate danger, staff must contact emergency services (999) and then inform the Designated Safeguarding Lead (DSL) as soon as possible.

14.3. RECORD- Documenting Safeguarding Concerns

All safeguarding concerns must be recorded accurately and promptly by completing [Eden's Trust Safeguarding Disclosure/Concern Google Form](#), once submitted DSL/CEO will be automatically notified.

Records must include:

- The date and time of the concern or disclosure
- The name of the individual involved
- A factual account of what was said or observed (using the person's own words where possible)
- Any actions taken
- The name of the person completing the record
- Who the concern was shared with

Records must:

- Be clear, factual and objective
- Avoid personal opinion or interpretation
- Be stored securely and confidentially
- Be kept separate from counselling or session notes
- Be shared only on a need-to-know basis

All records must comply with data protection legislation and Eden's Trust information sharing procedures.

14.4. REFER- Reporting and Escalation

All safeguarding concerns must be reported to the Designated Safeguarding Lead (DSL) or Deputy DSL within 2 hours of disclosure/concern.

The DSL will assess the concern and decide whether a referral is required to:

- Children's Social Care
- Adult Social Care
- Police
- Prevent
- Health or mental health services
- Other appropriate statutory or specialist agencies

Staff must not make referrals independently unless directed by the DSL or in an emergency situation.

If the concern involves the DSL, it must be reported to the Chair of Trustees or CEO.

Where there is immediate risk of harm, emergency services must be contacted without delay.

Balancing Safety, Confidentiality and Consent

Eden's Trust respects the rights of individuals to privacy and autonomy. Wherever possible:

- Consent should be sought before sharing information
- Individuals should be informed about what information will be shared and why
- Their wishes and views should be taken into account

However, safeguarding concerns will always override confidentiality where:

- There is a risk of serious harm
- A crime may have been committed
- The individual lacks capacity
- Others may be at risk

15. Allegations Against Staff and Volunteers

Eden's Trust takes all allegations against staff, counsellors, therapists, coaches and volunteers seriously and will act promptly to ensure the safety of children, young people and adults at risk.

An allegation may relate to a person who has:

- Behaved in a way that has harmed, or may have harmed, a child or adult at risk
- Possibly committed a criminal offence against a child or adult at risk
- Behaved towards a child or adult at risk in a way that indicates they may pose a risk of harm
- Breached professional boundaries or Eden's Trust Code of Conduct

Immediate Actions

Any allegation or concern about a member of staff or volunteer must be:

- Reported immediately to the Designated Safeguarding Lead (DSL)

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- If the allegation involves the DSL, it must be reported to the Chair of Trustees or Chief Executive Officer

The safety and welfare of the individual concerned will be the priority at all times.

Where there is an immediate risk of harm, emergency services must be contacted without delay.

Referral to Local Authority Designated Officer (LADO)

The DSL (or Chair of Trustees/CEO if the allegation concerns the DSL) will:

- Assess the allegation in line with statutory guidance
- Consult with and refer the matter to the Local Authority Designated Officer (LADO) where required
- Follow advice and guidance provided by the LADO regarding next steps

No internal investigation will be undertaken until advice has been received from the LADO or relevant statutory authority.

Confidentiality and Information Sharing

All allegations will be managed confidentially and sensitively, with information shared only on a need-to-know basis in accordance with data protection legislation.

The identity of the person making the allegation and the person who is the subject of the allegation will be protected as far as possible.

Staff must not discuss allegations with colleagues, service users or external parties unless authorised to do so.

Suspension and Interim Measures

Where appropriate, Eden's Trust may take interim measures to safeguard individuals while an allegation is being managed. This may include:

- Temporary suspension
- Adjustments to duties
- Increased supervision
- Alternative working arrangements

Any such action is a neutral act and does not imply guilt or wrongdoing.

Investigation and Outcome

Eden's Trust will cooperate fully with any external investigation conducted by statutory agencies.

Where an internal investigation is appropriate, this will be conducted fairly, promptly and in line with Eden's Trust disciplinary procedures.

Possible outcomes may include:

- No further action
- Additional training or supervision
- Disciplinary action
- Referral to professional bodies (where applicable)
- Referral to the Disclosure and Barring Service (DBS)

Support for All Parties

Eden's Trust recognises that allegations can be distressing for all involved.

Appropriate support will be offered to:

- The individual who raised the concern
- The child, young person or adult at risk
- The staff member or volunteer who is the subject of the allegation

Support may include supervision, counselling, HR support or signposting to external services.

Record Keeping

All allegations, actions taken and outcomes will be recorded accurately and securely by the DSL and retained in line with Eden's Trust data protection and retention policies.

Records will include:

- Details of the allegation
- Actions taken
- Decisions made
- Rationale for those decisions
- Outcomes

Key Principle

Eden's Trust is committed to ensuring that allegations are managed in a way that is:

- Child-centred and adult-centred
- Fair and proportionate
- Transparent and accountable
- In line with statutory guidance

Safeguarding remains the priority at all times.

16. Whistleblowing and Low-Level Concerns

Eden's Trust is committed to creating a culture of openness, transparency and accountability in which staff, counsellors, therapists, coaches and volunteers feel confident and supported to raise concerns about unsafe or inappropriate practice.

Whistleblowing and the reporting of low-level concerns play a vital role in maintaining high safeguarding standards and protecting children, young people and adults at risk from harm.

A **low-level concern** is any behaviour or practice by a member of staff or volunteer that may not meet the threshold for an allegation but is inconsistent with Eden's Trust Code of Conduct or professional standards.

This may include:

- Poor professional boundaries
- Inappropriate language or behaviour
- Failure to follow safeguarding procedures
- Conduct that causes discomfort or concern
- Patterns of behaviour that raise professional curiosity

Concerns may be raised about the behaviour of colleagues, managers, or volunteers.

Raising a Concern

All staff and volunteers are expected to:

- Report concerns about the conduct or behaviour of colleagues in good faith
- Share concerns promptly with the Designated Safeguarding Lead (DSL)
- If the concern involves the DSL, report directly to the Chair of Trustees or Chief Executive Officer
- Record concerns in line with Eden's Trust safeguarding procedures

Concerns should be raised within 2 hours to enable early intervention and prevent potential harm.

Protection and Confidentiality

Eden's Trust will:

- Treat all whistleblowing and low-level concerns seriously and sensitively
- Maintain confidentiality wherever possible
- Protect individuals who raise concerns from victimisation, harassment or retaliation
- Ensure that concerns are investigated fairly and proportionately

No member of staff or volunteer will be disadvantaged for raising a concern in good faith, even if it is later found to be unsubstantiated.

Failure to Report Concerns

Failure to raise safeguarding concerns or report inappropriate behaviour may itself be treated as a breach of safeguarding responsibilities and may result in disciplinary action.

Safeguarding is everyone's responsibility, and silence or inaction can place individuals at risk.

Key Principle

Eden's Trust encourages a culture where:

- Speaking up is seen as a professional responsibility
- Concerns are viewed as opportunities for learning and improvement
- Safeguarding takes priority over hierarchy or personal relationships

Raising concerns is an act of care and protection, not disloyalty.

17. Breaches of Policy

Eden's Trust expects all trustees, staff, counsellors, therapists, coaches and volunteers to comply fully with this Safeguarding Policy and Procedures and the Eden's Trust Code of Conduct.

A breach of this policy is any failure to follow safeguarding procedures, professional standards or agreed safeguarding responsibilities. This may include, but is not limited to:

- Failure to report a safeguarding concern
- Breach of confidentiality
- Failure to maintain professional boundaries
- Inappropriate conduct towards a child, young person or adult at risk
- Failure to attend required safeguarding training
- Non-compliance with safer working practices
- Obstructing or failing to cooperate with safeguarding processes

Responding to Breaches

Breaches of this policy will be managed promptly, fairly and proportionately, in line with Eden's Trust disciplinary and human resources procedures.

Depending on the nature and seriousness of the breach, actions may include:

- Additional safeguarding training or refresher training
- Increased supervision or monitoring
- Formal warnings or performance management
- Temporary suspension or removal from role
- Termination of employment or volunteering arrangements
- Referral to professional bodies, where applicable
- Referral to statutory authorities where required

Any action taken will consider:

- The level of risk posed
- Whether harm occurred
- The individual's role and responsibilities
- Previous conduct or patterns of behaviour
- The need to protect children, young people and adults at risk

Serious Breaches

Serious breaches of this policy, including deliberate or reckless behaviour that places others at risk of harm, may be treated as gross misconduct and may result in immediate suspension pending investigation.

Learning and Improvement

Eden's Trust is committed to using breaches of policy as opportunities for learning and improvement wherever possible. Patterns of breaches or concerns will be reviewed to strengthen training, supervision and safeguarding practice across the organisation.

Key Principle

Breaches of safeguarding policy undermine trust and safety. Eden's Trust is committed to ensuring that:

- Safeguarding standards are upheld at all times



- Concerns are addressed consistently and transparently
- Accountability is maintained
- The wellbeing of those accessing services remains the priority

Safeguarding is everyone's responsibility.

18. Review and Updates

This policy will be reviewed annually or sooner if there are changes in legislation, national guidance or organisational practice. Eden's Trust will ensure that all safeguarding procedures remain aligned with current statutory requirements and best practice.

19. Key Contacts

DSL: Shelly Khaled – shelly@edenstrust.org.uk +44 7956 284 504

CEO: Elli Galvani – elli@edenstrust.org.uk +44 7814 550 375

info@edenstrust.org.uk

Emergency: 999

Local authority safeguarding contact details will be accessed via the relevant local authority website for the area in which the concern arises

APPENDIX 1: Recognising Signs of Abuse

Recognising indications of potential abuse is complex, and there is no definitive checklist. Warning signs must always be assessed with care. The presence of one or more indicators does *not* confirm abuse, but concerns must not be dismissed.

Signs and Symptoms of Child Abuse and Neglect	
Physical Abuse- A child may have: <ul style="list-style-type: none"> - Bruising to head, ears, neck, abdomen, back, buttocks - Defensive wounds on forearms, upper arms, legs, hands or feet - Clusters of bruises on upper arms, thighs or torso - Bruises with small blood spots or patterned shapes (e.g. handprint) - Swollen eyes or bruised scalp caused by hair being pulled - Burns or scalds with clear edges; patterned burns (e.g. cigarettes) - Multiple burns/scalds at different stages of healing - Bite marks (oval/circular; visible indentations) - Fractures, especially in babies or at different stages of healing - Signs of poisoning (vomiting, drowsiness, seizures) - Respiratory issues from suffocation/drowning - Fear of going home or contact with caregivers - Aggression, self-destructive behaviour - Drug/alcohol misuse 	Emotional Abuse- A child may: <ul style="list-style-type: none"> - Have inappropriate emotional responses - Have hostility, aggression, angry outbursts - Have impulsivity and poor concentration - Withdrawal or social isolation - Have difficulty forming or maintaining friendships - Have low confidence and self-esteem - Have difficulty interpreting emotions - Have feelings of worthlessness or anxiety - Giving up easily; sense of helplessness - Have delayed speech or sudden speech disorder - Fear of new situations - Stealing behaviours - Running away - Drug/alcohol misuse
Sexual Abuse- A child may: <ul style="list-style-type: none"> - Talking about "secrets" or adults' behaviour - Daydreaming, distracted or distant behaviour - Nightmares or trouble sleeping - Bedwetting/soiling - Sudden aggressive or withdrawn behaviour - Poor self-image - Reluctance to participate in PE/sport - Sexualised behaviour, gestures or language inappropriate for age - Withdrawal from activities - Regression to younger behaviour - Eating disorders - Self-harm - Fear of specific people or places - Unexplained gifts or money - Risk-taking behaviours - Physical symptoms (pain, bleeding, discharge) 	Neglect- A child may have: <ul style="list-style-type: none"> - Poor personal hygiene; dirty clothes - Inadequate clothing for weather/conditions - Persistent hunger; arriving without food - Taking food from bins or stealing food - Untreated medical or dental issues - Repeated accidental injuries - Constant tiredness - Social isolation - Low self-esteem - Caring role for siblings (young carer responsibilities) - Developmental delay due to lack of stimulation - Challenging or attention-seeking behaviour - Frequent illness or infections - Missed medical appointments - Skin sores, scabies, flea bites, ringworm - Faltering growth / failure to thrive - Poor language or communication skills - Living in unsuitable home conditions (e.g. no heating, unsafe environment) - Being left alone frequently - Chronic lateness/absence from school - Drug/alcohol misuse



Appendix 2: How to Recognise, Respond, Report and Record Safeguarding Concerns

All staff, counsellors and volunteers must follow the Four R's when a safeguarding concern arises.

Recognise: Be alert to indicators of abuse (physical, emotional, sexual, neglect) or risk, such as unexplained injuries, sudden behavioral changes, or fear.

Respond: Stay calm, listen without judgment:

- Take concerns seriously and maintain professional boundaries
- Listen carefully- let them speak in their own words
- Use open questions only (“What, Where, Who, When, Why”)
- Do not investigate or try to verify details
- Reassure: “You’ve done the right thing telling me.”
- Be honest: “I can’t keep this a secret. I need to share this with people who can help.”
- Thank the person for telling you; reassure them they did the right thing
- Explain what will happen next

Staff/ Eden’s Trust Representatives must not:

- Take away the child/ adult at risk’s emotions by undermining theirs
- Investigate the disclosure/ concern
- Promise confidentiality
- Ask leading questions
- Attempt to resolve alone

Record: Document everything clearly and objectively, noting the 5 W's (Who, What, When, Where, Why) and any other relevant facts, as detailed notes are crucial, using [Eden’sTrusts Safeguarding Disclosure/Concern google form](#).

- Capture key information objectively, and accurately.
- Write factual notes - no opinions, no assumptions
- Use the exact words spoken by the child/young person/adult
- Distinguish clearly between what you saw/heard and what others told you
- Record: Date & time, Location, Who was involved, Your response, Who you informed
- Separate from counselling notes

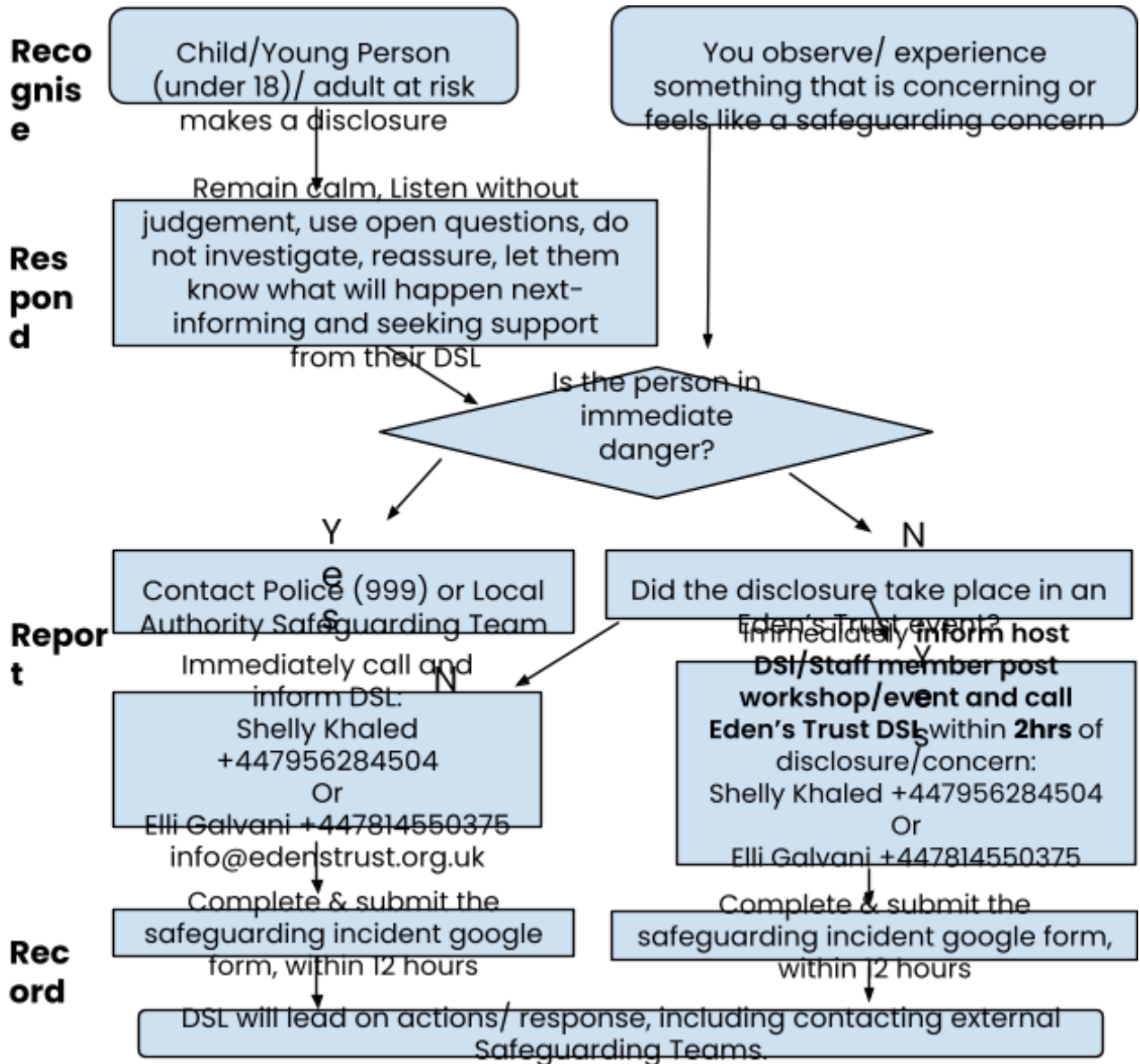
Report/Refer: Share your recorded concerns with the designated safeguarding lead or authority (like police or local authorities if immediate risk exists) according to established procedures.

All safeguarding concerns must be reported within 2hours of disclosure/ concern:

DSL: Shelly Khaled: shelly@edenstrust.org.uk (+447956284504)

CEO: Elli Galvani: elli@edenstrust.org.uk (+447814550375)

Eden's Trust Safeguarding Flow Chart- How to report a disclosure/concern



[Eden'sTrusts Safeguarding Disclosure/Concern google form.](#)