



SAFEGUARDING POLICIES, PROCEDURES AND GUIDELINES.

This document also includes:

Disclosure and Barring service Policy	page 54
Missing Vulnerable Persons Protocol	page 59
Professional Boundaries Policy	page 71

Bran Howell

Date: 04.04.2024

Safeguarding Team: Contact details

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If nobody is available **call Control on 1948**, they will contact a safeguarding officer

Emergency Contact Numbers for Mental Health Support

In an emergency if someone is at immediate risk of harm or is hurting themselves, ring **999 and request an ambulance**.

Inform the duty site manager: 07816 884 784

Eden Control/Security: 01726 811948

Contact details for Eden Project's Mental Health 1st aiders

[https://work-](https://work-73463311.workplace.com/work/file_viewer/2827334967498565/?surface=POST_ATTACHMENT)

[73463311.workplace.com/work/file_viewer/2827334967498565/?surface=POST_ATTACHMENT](https://work-73463311.workplace.com/work/file_viewer/2827334967498565/?surface=POST_ATTACHMENT)

Cornwall **Mental Health Crisis Intervention Team: 0800 038 5300**

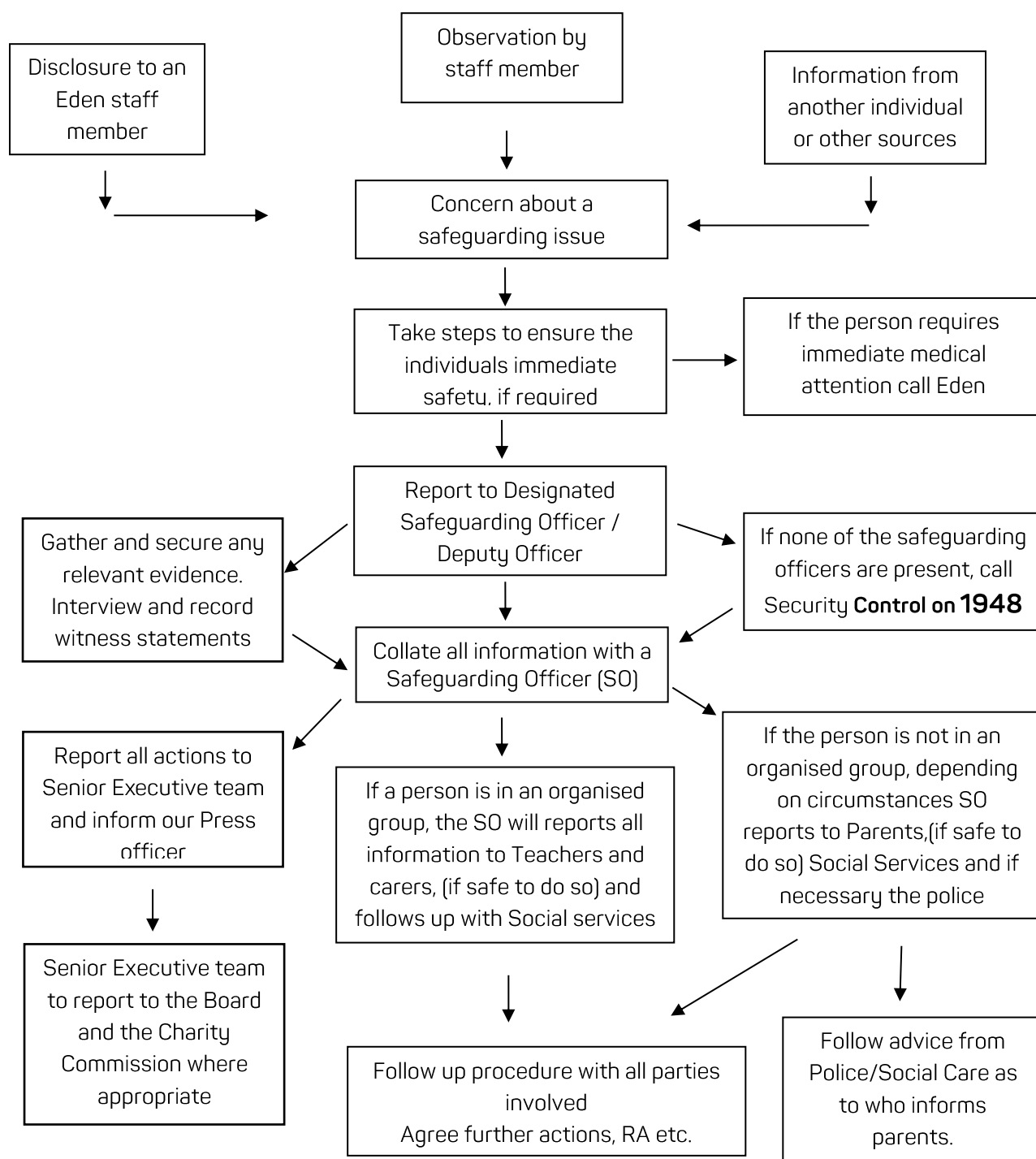
(24/7 free patient crisis line)

Cornwall Partnership Trust **Professional's Advice Line: 01209 881 999** (24/7)

NHS Mental Health Access Hubs:

Freephone 08081 966798 (Hours of operation: 24 hours a day, seven days a week).

What happens when you report a safeguarding concern?



If the concern involves a member of staff, trustees or visitor client or child, follow procedure above and report to Eden's Safeguarding Officer.

If the concern involves a teacher/group leader/parent/carer, follow the procedure above and a Safeguarding Officer will pass your concerns to the Safeguarding lead for the school or group when it is deemed safe to do so.

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Introduction

Safeguarding responsibilities should be a fundamental governance priority for all charities. We believe that we must ensure a culture of respect trust and professionalism throughout the organisation.

To fulfil our responsibilities, we must take reasonable steps to protect and look after people who come into contact with our charitable work both in person and online.

This includes:

- visitors
- staff
- volunteers
- trustees
- children *Definitions of the term children page 8*
- clients who benefit from our charity's work
- other people who come into contact with our charity through its work

All Staff and Trustees are responsible for welfare and safeguarding of children and adults at risk at work. *Definitions of the term adults at risk page 8*

They will be made aware of the policy and the supporting procedures and be clear on their responsibility to report all concerns to a designated Safeguarding Officers.

Policy statement

The Eden Project will welcome and treat everyone with respect whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity.

We believe that wellbeing is not only at the heart of safeguarding but is key to a better society for everyone. We are committed to promoting the safety and welfare of everyone by adopting this Safeguarding Policy.

We will meet this commitment by:

- **Applying Eden Project's Recruitment policy**, which ensures that staff and volunteers are vetted and complete a disclosure and barring service check if they are to have unsupervised, one to one contact with a child/young person or adult at risk.

- **Ensuring that all staff, volunteers and trustees are familiar with Eden Project's safeguarding policy**, and their responsibilities in its implementation.
- **All staff, volunteers and trustees receive mandatory safeguarding training**, commensurate to their role and the level of contact had with children, young people or adults at risk.
- **There is appropriate expertise in place to support staff, volunteers and trustees in carrying out their safeguarding responsibilities**, e.g. through designated safeguarding officers.
- **Robust, GDPR and compliance policies and procedures are in place** to support appropriate information gathering, sharing and storage, for safeguarding purposes.
- **That all activities and events** for children, young people and adults at risk are risk assessed.

For more details see Appendix K pages 54

Eden Project's Disclosure and Barring Service Policy and Procedure

(20+) GDPR Policies | Workplace

Retention of records page 18????????????????????????????????

All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately. If abuse does take place, it will be dealt with effectively and proportionately. Whenever possible we will ensure that it is the person, not the process, is at the centre of all our safeguarding work.

All Staff and Trustees *(see definition page 8)* will be aware of their responsibility to report any concerns however small.

This document describes how we:

- Protect children and adults at risk taking part in Eden Project activities.
- Assure teachers, carers and parents that the Eden Project is a safe place to visit.
- Raise awareness amongst all staff, so that they know what to do if they are concerned about a child or adults at risk
- Protect Staff and Trustees by giving practical, common sense, guidelines to avoid placing themselves in situations considered risky.
- Protect the organisation, by taking 'all reasonable steps' to provide a safe environment for everyone.
- If individuals are in difficulty and do not fall within this policy, we will support them and signpost them to other services which might offer support.

We will review our policy, procedures and practice annually, at least.

Definitions

For the purpose of Eden Project: Safeguarding Policy and Procedures document:

A Child is defined in the Children Act 1989 as anyone **under the age of 18**.

Please note, they could be staff, on work placement or visitors.

Adults at risk. Or vulnerable adults; vulnerability inevitably means something different to everyone. The Care Act 2014 defines a potential adult at risk as someone who:

- has needs for care and support,
- is experiencing, or at risk of, abuse or neglect;
- is unable to protect themselves from either the risk, or experience of, abuse or neglect.

For more details see appendix A pages 31

Definition of the term 'vulnerable adults/adults at risk.'

Staff are those employed on a contract of employment at Eden Project including those working on a voluntary/unpaid basis.

Trustees are voluntary and lead the charity by making decisions on behalf of the organisation and ensure good governance. Ultimately, they are responsible for making sure that the charity delivers its charitable work. They act collectively, and are described as board members or the board.

Clients are people that have been enrolled on a specific project or event that is being delivered by staff.

Visitors are the general public, on a paid visit to the Eden Project..

Abuse and neglect is a selfish act of oppression and injustice, exploitation and manipulation by those in a position of power. It can be caused by inflicting or failing to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture and may not be malicious or intentional, but still requires a safeguarding referral.

For more details see appendix B page 32

Recognition and definitions of Abuse and Neglect

Safeguarding is the process that aims to keep all children and adults at risk, free from abuse and neglect safe from harm, accidents and crime, promoting their mental and physical health, wellbeing and development.

Safeguarding is about supporting these principles through policies, procedures and actions, ultimately, safeguarding is everyone's responsibility.

Child Protection is ensuring that children are safe from abuse and neglect. child protection covers individual children identified as either suffering or at risk of harm.

Policies are a guiding principle used to set direction in an organization.

Procedures are a series of steps to be followed as a consistent and repetitive approach to accomplish an end result.

Guidelines provide background information to help you make informed decisions about policies and procedures.

Recognition of abuse

Recognising abuse can be difficult, abusers can go to great lengths to hide their actions and people at risk of abuse often conceal their situation.

If something concerns you, report it, however insignificant it may seem. We will support you through the process and consult external professionals on whether a threshold has been crossed and action needs to be taken.

Most children and some adults will receive cuts, grazes and bruises from time to time and their behaviour may give reason for concern but it isn't necessarily a sign of abuse.

However, unaccounted for injuries, implausible explanations and sudden and or lasting changes in behaviour should be carefully considered. There may well be other reasons for this, but any concern should be shared with a Safeguarding Officer.

Approach rumours, malicious gossip and stories with caution and concentrate on the welfare of the individual in question to help focus your thoughts and actions. Abuse or neglect can take different forms, it may be deliberate, through negligence or ignorance, but it is still abuse and needs reporting.

If you see something, say something.

For more details see appendix B Page 32

Recognition and definitions of Abuse and Neglect

Roles and responsibilities in Safeguarding

Safeguarding is the responsibility of everyone in the Eden team; it's up to us to ensure that the Eden Project is a safe and pleasant space spend time in.

All activities and sites are risk assessed, we will also assess the suitability of all clients attending activities; accounting for their physical health, mobility, support and mental health needs.

The Role of the Designated Safeguarding Officers

- To receive and manage all reports of incidents, allegations or suspicions of abuse and / or poor practice, in a professional, confidential and fair way.
- To pass concerns to the: **Multi Agency Referral Unit - 0300 1231 116**
- To inform the Senior Management Team about all incidents and any further action required.
- To share information and training about Safeguarding with staff, volunteers, clients, children and parents.
- To ensure that proper records, of any referral and action taken are kept safely and in confidence.
- *For more details, see our See Retention of records page 18*
- [*\(20+\) GDPR Policies / Workplace*](#)
- To seek advice from the Cornwall Safeguarding Board, NSPCC and Government.
- Assist the Human Resources Team with Safeguarding training and ensuring that the policy is accessible.
- To monitor and review the Safeguarding Policy, encourage compliance, monitor our practice across the organization, promote best practice and ensure that the policy remains relevant and useful.
- The Safeguarding Officers will receive regular training and support for this role.

The role of the Charity Board - Trustees

- Setting a culture that prioritises safeguarding.
- Providing a safe and trusted environment.
- Understanding how incidents and allegations will be handled.
- Ensuring that safeguarding has an appropriate place on board agendas.
- Overseeing the record of incidents alerts and complaints.
- Undertaking internal reviews and audits of policies and procedures.

The role of Managers

- Ensuring that they and their teams undertake the online training, are aware of this policy and have the knowledge, skills and confidence to follow it.

- Promoting a culture of trust and respect, supporting staff in safeguarding matters.
- Ensuring that anyone can raise a concern in a supportive and caring environment.

The role of Eden Project Staff

- To undertake the online training, know how to access, understanding and follow the policy at all times, to help identify and respond to abuse or risk of abuse.
- Ensure they follow our Data Protection and IT Usage policies and procedures.

Legislative framework, context and key principles for Safeguarding children

The legislation below has informed the content of the policy and procedures and has been considered when writing and agreeing this policy.

The Children Act 2004, and **Working Together to Safeguard Children 2022**, **The Care Act 2014**, **Keeping children Safe in Education 2023**

Eden Project supports the five outcomes of Every Child Matters 2003.

- | | |
|---------------------------------|----------------------------------|
| 1) Be healthy. | 2) Stay safe. |
| 3) Enjoy and achieve. | 4) Make a positive contribution. |
| 5) Achieve economic well-being. | |

Legislative framework, context and key principles for Safeguarding adults

Care Act 2014 - Sets out rules and guidance on all aspects of safeguarding and repeals the No Secrets guidance (2000). It is not set out in detail here as its contents inform the major parts of this policy.

For more details see appendix C pages 47

Mental Capacity Act 2005 (MCA) - The MCA 2005 was enacted to protect individuals and their freedoms. It empowers individuals to retain freedom of choice and, when choices cannot freely be made, it seeks to make sure that decisions are taken in the individual's best interests.

For more details see appendix D pages 48

Deprivation of Liberty Safeguards, Code of Practice 2008 - This sets out key provisions for the protection of those in some residential settings and hospitals who are deemed not to have capacity. A set of safeguards which ensure individuals are not unnecessarily deprived of their freedoms

For more details see appendix E pages 49

Safeguarding Vulnerable Groups Act 2006 - The purpose of this Act is to prevent those who may cause harm from working or volunteering in roles where they are in contact with adults at risk.

For more details see appendix F pages 49

The Human Rights Act 1998 - This gives legal effect in the UK to the fundamental rights and freedoms contained in the European Convention on Human Rights (ECHR).

For more details see appendix G pages 50

The Public Interest Disclosure Act 1998 (PIDA) - This is a framework for whistleblowing and offers protection when individuals raise genuine concerns about malpractice. All organisations must have a Whistleblowing Policy in place.

Protection of Freedoms Act 2012 - This Act brought together the agencies which now undertake DBS checks and issue certificates.

The Equality Act 2010 - the principles of the Equality Act 2010 underpin this policy: it covers everyone in Britain and protects people from discrimination, harassment and victimisation.

The context of this policy within the Eden Project Governance

The Eden Project's Safeguarding Policy is integrated with the following Policies:

- Health and Safety Policy
- Equality, Diversity and Dignity at work Policy
- Complaints and Grievance Policy
- Disciplinary Policy and Procedures
- Missing Persons at risk Protocol (included)
- Disclosure and Barring Service Policy and Procedure (included)
- Computer use ground rules policy
- Adults at Risk and Professional Boundaries Policy (included)
- Whistleblowing Policy
- GDPR policies

How to Respond to Concerns and Allegations

Report all concerns, to a Safeguarding Officer as soon as possible, however small and complete an **Incident Report Form**, even if the truth is uncertain.

For more details see [appendix J page 52](#)

Incident Report form

Children and adults at risk will generally only talk to people they trust. By listening, and taking it seriously, you are already helping to protect them.

Remain calm and avoid showing emotion. It is unlikely that the person is in immediate danger.

Find somewhere quiet to talk, but avoid being completely alone.

Listen carefully, hear and believe. Don't probe for more information. Questioning the participant may affect how their disclosure is received at a later date.

Don't make assumptions, paraphrase or offer alternative explanations.

Give time to the person to say what they want. Don't make anyone repeat a story unnecessarily.

Don't promise to keep secrets or that everything will be okay (it might not be).

Record in writing as near as possible what was said **as soon as you** can after the event. Do not write any personal thoughts and opinions.

Reassure and explain that they have done the right thing in saying something. Explain that only those who need to know will be told and you will keep them informed, as much as possible.

- **And act immediately;** report it to a Safeguarding Officer.
- **Don't deal with it yourself.** Do not start investigating.
- **Don't disclose anything to colleagues** it could hinder any further investigation.
- **Complete the Incident Report Form**, with the help of a safeguarding officer.

See [What happens when you report a concern – page 3 / 16](#)

How to Record Concerns and Allegations

Record and report the concerns as soon as possible after the event.

Include as much detail as possible.

Ensure the report is legible, and can be photocopied.

Ensure it is signed and dated and you have printed your name.

Keep the report factual, opinions, should be clearly labelled as such and be backed up by factual evidence.

Information from another person should be clearly attributed to them.

Keep the report(s) confidential.

If you need to amend your report, do not delete anything, ensure that changes are clear. Explain in a separate document why you needed to make amendments or additions.

Talk to a Safeguarding officer as soon as possible. (we can do the form together)

In cases where there is physical evidence of a crime scene follow the guidance in

For more information see appendix I page 51

Preserving Evidence

For more information see appendix J page 52

Incident Report Form

Refer to ***How to respond to Concerns and Allegations*** page 14

If have any concerns about the welfare of a child or adult at risk, you must act.

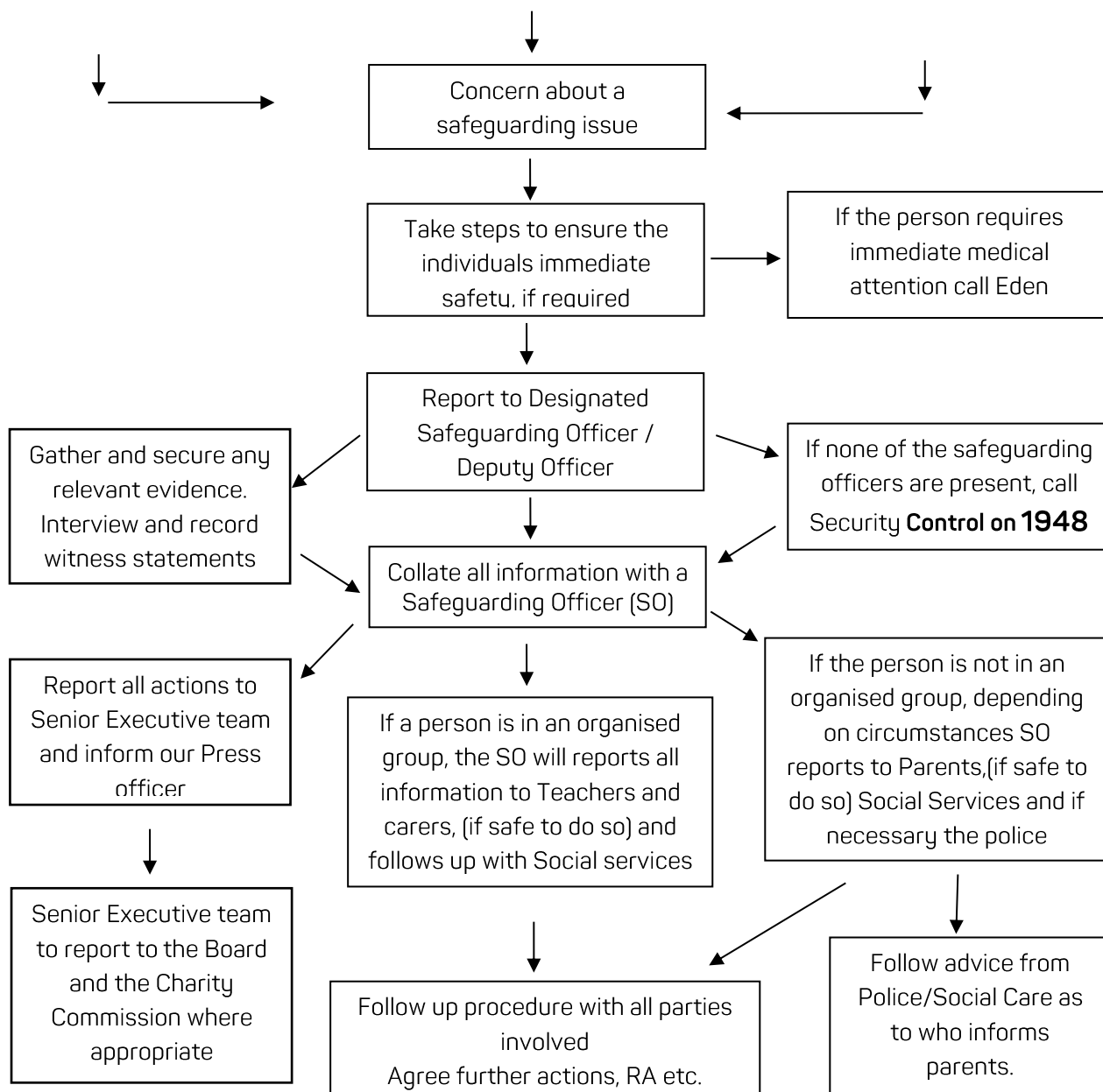
If you see something say something

What happens when you report a safeguarding concern?

Disclosure to an
Eden staff
member

Observation by
staff member

Information from
another individual
or other sources



If the concern involves a teacher/group leader/parent/carers, follow the procedure and a Safeguarding Officer will pass your concerns to the Safeguarding Officer for the school or group when it is deemed safe to do so. Remember to look after yourself and seek support during what could be a difficult situation.

It is not our responsibility to decide whether or not abuse or poor practice is actually taking place, we will report any concerns.

If you see something, say something.

What happens next?

Urgent actions will be taken to safeguard anyone at risk of immediate harm.

Local Authorities may make enquiries to assess whether the individual is unable to protect themselves from either, the risk of, or abuse or neglect.

The Local Authority will take steps to actively safeguard the individual. The concern will be logged on the Local Authority's database. It may be that the Local Authority decides it doesn't meet the threshold for intervention. If you disagree, then you should escalate the matter to senior managers.

If the Local Authority decides not to act, the Eden Project will take appropriate action to support the individual. Any agreed actions are recorded in accordance with the Data Protection Policy.

[\(20+\) GDPR Policies | Workplace](#)

Supporting Staff and Trustees during a Safeguarding investigation

The Eden Project has a duty of care to all Staff and Volunteers. The Trustees will ensure that the Eden Team are supported throughout the process, irrespective of their situation to help minimise the stress inherent in the allegations and disciplinary process. They will be given access to the MHFAW team, counselling or medical advice through our Employee Assistance partners. (Currently UNUM and Simply Health)

The People & Culture team will inform individuals of concerns as soon as possible and be told the likely course of action; unless there is an objection by Social Care or the Police. The P&C team will ensure that the employee has a named contact who will be their named support person through any formal processes and ensure they are aware of any extended support options (including the Members Assembly team).

When employees are suspended, they must be kept informed of the progress of their case and developments in the workplace. This will be via their names; People & Culture point of contact. Contact with colleagues and friends should not be precluded unless it is deemed to be prejudicial to the gathering and presentation of evidence. This will be made as a joint decision with appropriate bodies. Where suspension takes place, all contact with Eden will happen through the People & Culture team in the first instance.

When an employee returns to work following a suspension, or at the conclusion of a case, arrangements should be made to support their reintegration. This will

include briefing the line manager to ensure that they are fully supported on a day to day basis in situ.

Retention of records - information storage

Eden is committed to protecting the rights and privacy of individuals in accordance with the Data Protection Act 1998.

For full information about data protection, see our GDPR policies

[\(20+\) GDPR Policies | Workplace](#)

The Eden Project will keep clear and accurate records of safeguarding concerns; protecting evidence, recording action that have been taken, decisions that are made, and why.

It is equally important to record when actions have not been taken and why.

All personal information regarding an adult at risk, will be retained in line with Eden Project's Data Protection Policy and Record Management Policy. All written records will be kept securely. All records will also be destroyed in line with Eden Project's records management policy.

The following key questions are asked when determining what information to record, store and share:

- What information do Staff and Trustees need to know in order to keep adults safe under the duty to protect people from harm?
- What information is not necessary?
- What is the basis for any decision to share, or not share, information with a third party?

Where Staff and Trustees have breached the code of conduct, the Eden Project will record behavior, the action taken and any outcomes.

Personnel files and training records should be kept for 7 years after employment ceases.

The Disclosure and Barring Service form must be destroyed after 6 months but a record of the date, the reference number, the decision about vetting and the outcome must be kept.

All safeguarding referrals should be acknowledged in writing by Social Care and kept by the Eden Project. Records should be kept indefinitely in a secure place.

For more details see appendix K page 54

Eden Project's Disclosure and Barring Service Policy and Procedure

Sharing information

The Eden Project must act within all legislative, common law and other related provisions including, but not limited to, the **Data Protection Act 2018** and **General Data Protection Regulations** and **Eden Project's Data Protection Policy**.

[\(20+\) GDPR Policies | Workplace](#)

When you share information in good faith to help identify and safeguard a child, It will never breach UK data protection law to share all the information you need to with an appropriate person or authority in order to safeguard a child"

The Information Commissioner 2023

Safeguarding raises significant issues around information sharing when balancing a person's right to free choice, with the responsibility to keep them safe. If an adult discloses abuse, but doesn't want it reported, they should be told that the concern will be raised in confidence with the safeguarding team if:

- they are at risk of serious harm,
- the safety of others is compromised,
- if it is necessary to prevent a crime,
- the person lacks capacity to consent.

Agencies such as the police and local authority adult can be asked to deal with the matter in confidence, in line with all relevant statutory and common law rules.

If a young person discloses anything of concern, they should be told that it must be passed on to social service ([via our procedures page 16](#)) if we believe that they are at any risk of harm.

[See Retention of records – information storage page 18](#)

We use the Caldicott Principles as a guide to good practice. When sharing safeguarding concerns.

The Caldicott Principles

Principle 1 - Justify the purpose(s) for using confidential information

Every proposed use or transfer of personal confidential data organisation should be clearly defined and documented. Continuing uses should be regularly reviewed.

Principle 2 - Don't use personal confidential data unless it is absolutely necessary

Personal confidential data items should not be included unless it is essential for the specified purpose(s).

Principle 3 - Use the minimum necessary personal confidential data

Each individual item of data should be considered and justified. Ensuring that the minimum amount of personal confidential data is transferred for a given function to be carried out.

Principle 4 - Access to personal confidential data should be on a strict need-to-know basis

Only those individuals who need access to personal confidential data should have access data items that they need to see.

Principle 5 - Everyone with access to personal confidential data should be aware of their responsibilities

Action should be taken to ensure that those handling personal confidential data - are fully aware of their obligations regarding confidentiality.

Principle 6 - Comply with the law

Every organisation should have someone who handles personal confidential data and is responsible for ensuring that the organisation complies with legal requirements.

Principle 7 - The duty to share information can be as important as the duty to protect patient confidentiality

Specialist members of Eden Project staff should have the confidence to share information in the best interests of their clients within the framework set out by these principles. They should be supported by their employers, regulators and professional bodies.

Requests for information to assist an investigation

Statutory agencies, recognise that adults have a right to independence, and self-determination, however in the context of safeguarding, The Care Act 2014, section 45 – states that these rights can be overridden by the Safeguarding Adults Board, in order to further their enquiries.

The interests of the organisation should not override the need to share information.

(20+) GDPR Policies | Workplace

If there is any concern about sharing information, with the Multi-Agency Referral Unit (MARU) 0300 123 1116 we will seek legal advice.

For more information see Appendix H page 50

Request for information in order to assist an investigation

Recruitment of staff

The application pack includes:

An application form together with a Role Profile including the nature of responsibility towards children and adults at risk.

What skills are expected and what kind of person is required.

All Eden Project staff, must undergo the same procedures to ascertain information such as: past career, relevant interests, any gaps in employment and reasons for leaving, educational qualifications and National Governing qualifications.

A minimum of two references will be taken up, and be from reputable sources followed up by letter or telephone.

Interview and Eden Project Induction

A representative/s from Eden Project will meet each applicant for an interview. The expectations, roles and responsibilities of the job will be clearly clarified.

Disclosure and Barring Checks

All volunteers, Staff and Trustees within our organisation will be appropriately DBS checked in accordance with their role and in line with the current law.

For more details see appendix K page 54

Eden Project's Disclosure and Barring Service Policy and Procedure

If a job description involves unaccompanied and / or regular contact with children or adults at risk, we will make relevant background checks, obtain consent for Disclosure and Barring (DBS) checks, and require applicants to disclose any previous criminal convictions, cautions and formal warnings by completing a self-disclosure form.

Where a person has worked with children and adults at risk at least one reference should be taken up from that employer.

Acceptable forms of personal identification will be the same as are used for the Disclosure and Barring Service.

Effective measures are in place to ensure confidentiality of information held.

All new staff will receive an Eden Induction in which they:

- meet key people and find out about Eden's mission and aims.
- sign **Eden Project's Health and Safety** and **Adults at Risk Policy**.
- **Eden Project's Equal Opportunities Policy**.

- **Eden Project's Complaints and Grievance Policy.**
- **Eden Project's Disciplinary Policy and Procedures.**
- **Eden Project's Eden's Code of Ethics and Conduct.**
- **Eden Project's Equity Statement.**
- **Eden Project's Safeguarding Policy, Procedures and Guidelines.**
- **Professional Boundaries Policy Appendix I, Page 46**

Safeguarding Training

Safeguarding at Eden is a mandatory online course for all staff.

The Designated Safeguarding Officer and Safeguarding Officer/s will attend the following training:

- Safeguarding Protecting Children and Adults at risk,
- Disability Awareness,
- First Aid Training.

Search 'Safeguarding at Eden' E-learning course - Workplace

Working with children and adults at risk of being vulnerable

All Eden Project Staff and Trustees should demonstrate professional behaviour to protect the people they are working with and themselves from allegations of misconduct. All activities and sites will be risk assessed and the suitability of individuals will be matched with the planned activities.

The following points are part of creating a positive culture of respect.

Good practice means:

- Treating everyone at risk equally with respect and dignity respecting individuals' rights to privacy.
- Set an example in everything they do.
- Always working in an open environment, maintaining a safe and appropriate distance with children and adults at risk, avoiding private or unobserved situations and encouraging open communication.
- Building balanced relationships based on mutual trust and empowering children and adults at risk to share in decision making.
- Being an excellent role model – this includes not smoking, swearing or drinking alcohol in the company of young people and adults at risk.
- Giving enthusiastic and constructive feedback rather than negative criticism.

- Recognising the developmental needs and capacity of young people and adults at risk.
- Reporting any situations that make staff feel uncomfortable.
- Be alert to any potential harm or inappropriate behaviour by people who are vulnerable.

You should never:

- Engage in rough physical or sexually provocative games.
- Be alone with a child or adult at risk.
- Allow or engage in any form of inappropriate physical contact.
- Allow the use of inappropriate and/or offensive language unchallenged.
- Make sexually suggestive comments, even in fun.
- Allow allegations made by a child or adult at risk to go unrecorded or not acted upon.
- Do things of a personal nature for children or adults at risk that they can do for themselves.
- Invite or allow children or adults at risk to meet unsupervised and / or outside your professional remit.
- Do anything which might undermine a good reputation for providing a safe environment.

E safety

Eden Project has a duty of care to protect people who make use of information technology as part of their involvement with us. We will ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use information technology.

Eden Project will use our procedures to deal firmly, fairly and decisively with any examples of all inappropriate ICT use, complaints or allegations; (including breaches of filtering, illegal use, cyberbullying, or use of ICT to groom a child or to perpetrate abuse).

If Eden has reasonable suspicions that criminal activity is or has taken place then more detailed monitoring will occur without notice to the individual concerned.

In line with Eden Project's Safeguarding Policy, the ICT team reserves the right to carry out routine checks on network storage and recall any mobile device that

contains Eden Project data to carry out an inspection / audit to ensure that the content is in compliance with our policies and the law.

For full details see appendix K page 54

Disclosure and barring service Policy

Photo Consent, Images and media page 26 - Appendix M page 61

E. safety and Safeguarding

We will

- Support people using our service to use the opportunities offered by mobile technology and the internet in a way that keeps them safe and shows respect for others.
- Ensure that Eden Project staff follow guidelines for recording images of young people see **Image and media** Policy page 8 and the **Image consent form, Appendix B**, page 31.
- Ensure that any social media tools used are risk assessed in advance.
- Ensure that Eden staff do not deliberately browse, download or upload material that could be considered offensive or illegal. If staff accidentally come across any such material they must report it immediately to a member of ICT Staff or their line manager.
- Eden staff should only contact individuals using Eden Project email accounts (which are monitored as necessary).
- All staff must refer any potential safeguarding issues to the Safeguarding Officer.

Teaching online

Before starting an online lesson, remind the group:

It is not acceptable for anyone (including staff) to record visual or audio content, take screen shots or videos or share private information without documented permission.

Personal details; such names of pupils, schools and any contact details will not be recorded or reproduced on any platform.

Eden Project staff must seek school and or parental permission before they contact any young people on line.

Eden Project staff must only communicate with school pupils during school hours and through professional Eden platforms, personal accounts should never be used and individual's details should never be made public.

Two adults should always be present online, the adult responsible for the group (i.e. acting in Loco Parentis) should never leave Eden staff alone with young people.

Care must be taken if the young people are in an informal education setting; each case will be different please refer to the Lead Safeguarding Officer.

Any disclosure of online abuse will be dealt with in the same way as a face-to-face disclosures.

Whenever possible sessions should be delivered from the Eden Project. To create a safe environment when teaching online, there are several things you should consider:

- Switch the settings to have microphones and videos off when joining the meeting.
- Ensure the host is in control of the screen.
- Learn how to mute and unmute all participants, including video screens.
- Be conscious of your backgrounds removing all personal and sensitive material and be aware of others in the room.
- Remind users about respecting others and using the chat box for commentary.
- Dress behave and talk appropriately.

The use of Webcams and Livestreaming on site

The regulations for webcams and Livestreaming are similar to those for CCTV (closed-circuit television). The area in which the webcam is being used must be well signposted and the field of view must be targeted at the activity itself.

The public must know that cameras are being used before they enter the area, this, in effect, means Eden Project is getting their consent.

The Eden Project must tell the public:

- Why the webcam is there.
- What we will use the images for
- Who might look at the images.
- How to contact the Eden Project if they have any questions.

Photo Consent, Images and media –

It is important to minimize the risk of anyone using images and films of people in an inappropriate way. Everyone should be consulted about having their image taken and how they may be used. (with children parents usually step in)

We will always use our Image consent form when recording images.

See appendix M, page 61

Photo / Video / Website Consent Form

Where activities take place in the public realm it is generally not possible to control photography and filming. However, any concerns about inappropriate or intrusive photography or filming, or about the use of images, should be safely challenged and reported to a Safeguarding Officer

Parents and public should be prepared to identify themselves if requested and respectfully asked to state their purpose for photography/filming.

Key principles to bear in mind:

- Ensure an Image consent form has been read, understood and signed by a parent before taking photos or video. Any photographer, member of the press or media should wear identification at all times and be fully briefed regarding his/her behavior and the issues covered by these guidelines.
- Do not allow a photographer to have unsupervised access to children and people at risk or allow them to arrange meeting outside the event.
- When publishing images, ensure they are appropriate and don't include anything that enables the subject to be named, contacted or located.
- Care must be taken in the storage of and access to images. Eden commits to protecting the rights and privacy of individuals in accordance with the Data Protection Act 2018
- Refer to the Eden Project Data Protection Policy and Data Retention Policy

For full details see appendix M page 61.

Image Consent Form

Acting in Loco Parentis

In the event of parents leaving minors in our care, we accept a higher level of legal responsibility and are acting “**in loco parentis**”, which means, ‘**in place of the parent**’. The acting leader should exercise the same care and skill when caring for that child as if for their own children. All activities should be risk assessed and cleared by the Health and Safety Manager.

If Eden Project is acting in Loco Parentis.

- All members of the team who have regular contact with young people should have a DBS check.
- A set of rules should be agreed, preferably by the group themselves.
- A ratio of 1:6 for ages 3 to 8 is recommended, 1:10 /15 for ages 9 to 12, 1:15/20 for groups aged 12 to 18.
- Eden Project staff should work in pairs and never be alone with a child.
- Eden Project staff should not administer medicines but should have a record of individuals who have medical conditions - see below.
- Eden Project staff have the right to refuse entry or to send individuals home if they are a danger to themselves or others: or if they arrive unsuitably dressed.
- If an individual is endangering themselves or others the group leader is entitled to use reasonable force to restore order. The leader mustn't act alone and an assessment of the situation should be made first.
- Parents will be expected to come and collect an individual if they are unwell or a danger to themselves or others.
- Eden Project staff are not responsible for individuals after the advertised session. If an individual is not collected on time their parents / guardians can be asked not to bring them children again.
- These guidelines should be made clear to all parents/responsible adults.

for more information See Appendix N, page 62

Acting in Loco Parentis, Parental Consent Form

Missing Vulnerable person protocol

This protocol applies to any person at risk who is missing from their guardians / parents / teachers / carers (and it happens frequently throughout the year).

For more details see appendix L pages 60

Missing Vulnerable person protocol

Running Events

- It is our duty and legal obligation to ensure that we take all reasonable steps to ensure that events are safe and well managed.

For more information see appendix O pages 63

Running Events - Good Practice

Working with External Organisations on site

- External organisations visiting the Eden Project, are legally responsible for their groups care and welfare. It is our role to ensure that their trip is enjoyable and safe. A member of Eden staff must act as a contact.

For more details see appendix P pages 64

Working with External Organisations on site,

Working with people under 18 yrs. old

Staff should be aware that everyone under the age of 18, **including students' volunteers work placement students**, is covered by our Safeguarding Policy.

For more details see appendix Q pages 65

Working with people under 18 yrs. old

Responding to mental health concerns and incidents

Occasionally you might find yourself in contact with somebody who is exhibiting signs of distress, anxiety or stress. They could be staff, visitors or clients.

- **Do not put yourself in danger**, try not to work alone or in a secluded space.
- Be cautious about offering physical comfort.
- Be yourself act confidently and be the person that they can trust.
- Establish dialogue and use reassuring language.
- If the person is in immediate risk of harm call 999 and explain the situation. You might be referred to the Mental health nurses in the emergency operations centre.
- Contact a Site manager and follow safeguarding procedures.
- Listen carefully and make notes as soon as you can.
- Inform the person that you concerned about their wellbeing and want them to talk to a mental health first aider, ask if they are happy to be contacted.

For more information see Appendix R page 66

Responding to Mental Health concerns and incidents

And Appendix S page 69

Client Emergency Information Sheet

Look after yourself and request a meeting with the Mental Health First Aider or Safeguarding team to debrief and talk through your experience.

[Useful Contact details page 2](#)

Professional Boundaries Policy

Staff should establish rapport and support the clients we work with. However, staff are also responsible for maintaining appropriate professional boundaries.

This policy is part of the Eden Project's, Safeguarding Policies and sets out Eden Project's principles and guidance.

[For more details see appendix T pages 71](#)

[Professional Boundaries Policy and Guidance](#)

USEFUL CONTACTS

For Safeguarding Issues

Safeguarding Team: Contact details

Bran Howell Education Specialist 01726 818832 (24hrs.) bhowell@edenproject.com	Becky Fenner Hospitality Manager 07850 700369 bfenner@edenproject.com
James Rew Duty Manager 01726 818569 jrew@edenproject.com	Dawn George Chief People and Culture Officer 01726 818869 dgeorge@edenproject.com
Matt Lee Duty Manager 01726 818780 matthewlee@edenproject.com	Tracey Robbins Head of UK Delivery 07976 131070 trobbins@edenproject.com

If there aren't any Eden safeguarding officers on duty ring; **the Site Safety Team on 1948** who will contact a safeguarding officer

If all else fails call the

Multi Agency Referral Unit (MARU) on: 0300 123 1116.

www.supportincornwall.org.uk/kb5/cornwall/directory/service.page?id=pi-Bn9YAMYM

email:

<mailto:MultiAgencyReferralUnit@cornwall.gcsx.gov.uk>

Emergency Duty Team – Out of hours 01208 251300

Adult Safeguarding Team 0300 1234 131

National Domestic Abuse helpline – 0808 2000 247

Devon and Cornwall Police: 101

Accessing Mental Health Support

In an emergency if someone is at immediate risk of harm or is hurting themselves, ring **999 and request an ambulance.**

Inform the duty site manager: 07816 884 784

Eden Control/Security: 01726 811948

Cornwall **Mental Health Crisis Intervention Team: 0800 038 5300**

(24/7 free patient crisis line)

Cornwall Partnership Trust **Professional's Advice Line: 01209 881 999** (24/7)

NHS Mental Health Access Hubs:

Freephone 08081 966798 (Hours of operation: 24 hours a day, seven days a week).

Contact details for Eden Project's Mental Health 1st aiders

[https://work-](https://work-73463311.workplace.com/work/file_viewer/2827334967498565/?surface=POST_ATTACHMENT)

[73463311.workplace.com/work/file_viewer/2827334967498565/?surface=POST_ATTACHMENT](https://work-73463311.workplace.com/work/file_viewer/2827334967498565/?surface=POST_ATTACHMENT)

Appendices



Appendix A

Definition of the term 'vulnerable adults/adults at risk.'

Vulnerability is a term which inevitably means something different to everyone. The Care Act 2014 defines a potentially vulnerable individual as someone who: needs care and support, is experiencing, or at risk of, abuse or neglect; and as a result, is unable to protect themselves from either the risk of, or abuse or neglect. However, whilst anyone could be an adult in need, for the purposes of the Care Act, there are certain groups that might be considered as vulnerable or in need. These are:

- Older people.
- People with learning disabilities/difficulties.
- People with mental health issues.
- People who are homeless.
- People who have issues with substance misuse.
- People who experience domestic violence.

We must all be alert to safeguarding these groups, but should help everyone, whether they fall within these definitions or not.

Appendix B

Recognition and definitions of Abuse and Neglect

Defining abuse or neglect is complex, the term "abuse" can be subject to wide interpretation. It may be physical, verbal or psychological, or it may occur where a person is persuaded to enter into a financial or sexual transaction to which they have not consented, or cannot consent to.

Incidents of abuse may be one-off or multiple, and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of poor care may be an indication of more serious problems and of what we describe as organisational abuse. In order to see these patterns, it is important that information is recorded and appropriately shared.

Recognition of potential abuse and neglect

Abuse or neglect may deliberate, through negligence or ignorance.

Exploitation can be a common in abuse or neglect.

Abuse or neglect can take different forms but the Care Act guidance identifies the following types of abuse or neglect:

- Physical abuse.
- Domestic violence.
- Sexual abuse.
- Psychological abuse.
- Financial or material abuse.
- Modern slavery.
- Discriminatory abuse.
- Organisational abuse.
- Neglect and acts of omission.
- Self-neglect.

Since the Act came into force in 2015, other types of abuse have since been recognised, including criminal and sexual exploitation and cuckooing.

Physical abuse

Physical abuse includes assault, hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate sanctions or force-feeding, inappropriate methods of restraint, and unlawfully depriving a person of their liberty.

Physical abuse has been linked to emotional and behavioural problems and educational difficulties. Violence is pervasive and the physical abuse frequently coexists with domestic violence.

Possible indicators of physical abuse are:

- Unexplained or inappropriately explained injuries.
- A person exhibiting untypical self-harm.
- Unexplained cuts or scratches to mouth, lips, gums, eyes or external genitalia.
- Unexplained bruising to the face, torso, arms, back, buttocks, thighs, in various stages of healing.
- Collections of bruises that form regular patterns which correspond to the shape of an object or which appear on several areas of the body.
- Unexplained burns on unlikely areas of the body (e.g. soles of the feet, palms of the hands, back), immersion burns (from scalding in hot water or liquid), rope burns, or burns from an electrical appliance.

- Unexplained or inappropriately explained fractures at various stages of healing to any part of the body.
- Medical problems that go unattended.
- Injuries that remain untreated.
- An injury which a parent or carer tries to hide, or for which they might have given different explanations.
- Sudden and unexplained urinary and/or faecal incontinence.
- Evidence of overusing or underusing medication.
- The person flinches or shies away from physical contact.
- The person appears frightened or subdued in the presence of particular people.
- The person asks not to be hurt.
- The person may repeat what the person causing harm has said (e.g. 'Shut up or I'll hit you').
- Reluctance to undress or uncover parts of the body.
- The person wears clothes that cover all parts of their body or specific parts of their body.
- Changes in the person's behaviour.
- A person with capacity not being allowed to go when they ask to or when they are invited out by another person.
- A person without capacity not being allowed to be discharged at the request of an unpaid carer/family member.

Domestic abuse

The Home Office offers the following definition of domestic abuse:

Age range is 16 years old and above."

"An incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality. It includes psychological, physical, sexual, financial, emotional abuse, so-called 'honour-based' violence, Female Genital Mutilation and forced marriage.

Coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence will impose a maximum 5 years imprisonment, a fine or both.

Many people think that domestic abuse is restricted to abuse between intimate partners, but it also extends to other family members. Family members are defined as: mother, father, son, daughter, brother, sister and grandparents, whether directly related, in-laws or step-family.

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour or violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. It also includes honour-based violence, female genital mutilation and forced marriage.

Possible Indicators of domestic violence include:

- Evidence of physical or sexual assaults.
- Verbal and psychological abuse and humiliation in front of other people.
- Low self-esteem.
- Belief that the abuse is somehow their fault.
- Fear of others and unwillingness to engage with outside intervention.
- Damage to home or property.
- Isolation, from friends, family and the wider community.
- Not having enough money for daily life.
- Missing appointments without notice or explanation.

Coercive or controlling behaviour is a core part of domestic violence.

Coercive behaviour can include:

- Physical and sexual assault; including threats, humiliation and intimidation.
- A person being punished.
- Making a person fearful.
- Keeping the person away from their friends, family and sources of support.
- Limiting access to resources or money.
- Preventing the person from leaving or escaping abuse.
- Regulating everyday behaviour and activities including what they can wear, where they can go, how to behave and who they see.

Sexual abuse

Sexual abuse includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the person has not consented or was pressured into consenting.

It includes penetration of any sort, incest and situations where the person causing harm touches the abused person's body (e.g. breasts, buttocks or genital area), exposes his or her genitals (possibly encouraging the abused person to touch them) or coerces the abused person into participating in or looking at pornographic videos or photographs. Denial of a sexual life to consenting adults is also considered abusive practice. Any sexual relationship that develops between adults

where one is in a position of trust, power or authority in relation to the other (e.g. a day centre worker, social worker, residential worker, health worker etc.) may also constitute sexual abuse.

Possible indicators of sexual abuse are:

- The person has urinary tract infections, vaginal infections or sexually transmitted diseases that are not otherwise explained.
- The person appears unusually subdued, withdrawn or has poor concentration.
- The person exhibits significant changes in sexual behaviour or outlook.
- The person experiences pain, itching or bleeding in the genital/anal area.
- The person's underclothing is torn, stained or bloody.
- The person is fearful of contact.
- The person's behaviour changes.
- The person becomes introverted and does not want to talk when otherwise they are quite sociable.
- A woman who lacks the mental capacity to consent to sexual intercourse becomes pregnant.
- Exhibiting sexually explicit behaviour, for instance playing games and showing awareness which is inappropriate for the child's age.
- Showing a lack of trust in adults, particularly those who would normally be close to the child or adult at risk.
- A member of staff's behaviour, the way in which they relate to a child or adult at risk, causes concern.

Psychological abuse

Psychological abuse includes emotional abuse and takes the form of threats of harm or abandonment, deprivation of contact, humiliation, rejection, blaming, controlling, intimidation, coercion, indifference, harassment, verbal abuse, including shouting or swearing, cyber bullying, isolation or withdrawal from services or support networks.

Psychological abuse is the denial of a person's human and civil rights, including choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation.

It includes preventing the person from using services that would otherwise support them and enhance their lives. It also includes the intentional and/or unintentional withholding of information, such as information not being available in different formats, languages, etc.

Possible indicators of psychological abuse are:

- Untypical ambivalence, deference, passivity, or resignation.
- The person appears anxious or withdrawn, especially in the presence of the alleged abuser.
- The person exhibits low self-esteem.
- Untypical changes in behaviour (e.g. continence problems, sleep disturbance).
- The person is not allowed visitors and/or phone calls.
- The person is locked in a room or in their home.
- The person is denied access to aids or equipment (e.g. glasses, dentures, hearing aid, crutches, etc.).
- Access to personal hygiene and the toilet is restricted.
- Movement is restricted by use of inappropriate furniture or other equipment.
- Bullying via social networking internet sites and persistent texting.

Financial or material abuse

This includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Possible indicators of financial abuse are:

- Lack of heating, clothing or food.
- Inability to pay bills and/or unexplained shortage of money.
- Lack of money, especially the day after receiving money, such as benefits.
- Inadequately explained withdrawals from accounts.
- Unexplained loss/misplacement of financial documents.
- The recent addition of authorised signatories on an adult's accounts or cards.
- Disparity between assets/income and living conditions.
- Power of attorney obtained when the person lacks the capacity to make this decision.
- Recent changes of deeds/title of house or will.
- Recent acquaintances expressing sudden or disproportionate interest in the person and their money.
- Service-user not in control of their direct payment or individualised budget.
- Mis-selling/selling by door-to-door traders/cold calling.
- Illegal money-lending.

Scams

These can arise from contact by email, letter, or telephone, or in person, and involve making false promises to con victims out of money. There are many types of scams but some of the most common are:

- fake lotteries;
- deceptive prize draws or sweepstakes;
- clairvoyants; computer scams; and
- romance scams.

Individuals or gangs attempt to trick people with official-looking documents or websites or convincing telephone sales. They have the aim of persuading people to send a processing or administration fee, pay postal or insurance costs, buy an overvalued product, transfer savings from their bank accounts or make a premium rate phone call.

Doorstep Scams are crimes carried out by bogus callers, rogue traders and unscrupulous sales people who call, often uninvited, at a person's home under the guise of legitimate business or trade.

Modern slavery

Including slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A number of active organised crime groups are involved in modern slavery. However, it is also committed by individual perpetrators. There are many different characteristics that distinguish slavery from other human rights violations. However, only one needs to be present for slavery to exist.

Someone is in slavery if they are:

- forced to work - through mental or physical threat;
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as 'property'; or
- physically constrained or have restrictions placed on his/her freedom of movement.

Modern slavery takes various forms and affects people of all ages, gender and races. Human trafficking involves an act of recruiting, transporting, transferring, harbouring or receiving a person through a use of force, coercion or other means, for the purpose of exploiting them. Trafficking can be domestic or it can involve trafficking adults into the UK,

If an identified victim of human trafficking is also a person with care and support needs, the response will be coordinated under the person safeguarding process. The police are the lead agency in managing responses to adults who are the victims of human trafficking.

There is a national framework to assist in the formal identification of victims and help to coordinate the referral of victims to appropriate services. This is known as the National Referral Mechanism.

Possible indicators of modern slavery

Signs of various types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender or ethnicity or nationality.

Possible indicators of modern slavery include.

- A person is not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else.
- The person has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred.
- The person looks malnourished, unkempt, or appears withdrawn.
- They have few personal possessions and often wear the same clothes.
- The clothes they do wear may not be suitable for their work.
- The person is withdrawn or appears frightened, unable to answer questions directed at them, or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live.
- They appear under the control and influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. Many victims will not be able to speak English.
- They are fearful of people in general and the authorities in particular.
- The person perceives themselves to be in debt to someone else or in a situation of dependence.
- The person lives in inappropriate or unduly cramped accommodation.
- Adults, sometimes in groups, are seen in places where you wouldn't expect. For example, groups of adults waiting in the countryside and not at a bus stop for a "lift".

Possible environmental indicators of modern slavery

Signs outside of a property that may indicate modern slavery is taking place includes:

- Bars covering the windows of the property.
- Curtains are always drawn.
- There are coverings over the windows, such as reflective film or coatings.
- The entrance has CCTV cameras installed.
- The letterbox is sealed to prevent use.
- There are signs that the electricity may have been tacked on from neighbouring properties or directly from power lines.

Possible signs inside a property that indicate modern slavery includes:

- Locked rooms or no access to the back rooms of the property.
- Overcrowding.
- The house is in poor condition, needing repair work.

Discriminatory abuse

This includes discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment.

Hate crime can be viewed as a form of discriminatory abuse, although it will often involve other types of abuse too. It also includes not responding to dietary needs and not providing appropriate spiritual support. Excluding a person from activities on the basis they are 'not liked' is also discriminatory abuse.

Possible indicators of discriminatory abuse

Indicators for discriminatory abuse may not always be obvious and may also be linked to acts of physical abuse and assault, sexual abuse and assault, financial abuse, neglect, psychological abuse and harassment, so the indicators listed above may also apply to discriminatory abuse.

A person who is suffering discriminatory abuse may also:

- Reject their own cultural background and/or racial origin or other personal beliefs, sexual practices or lifestyle choices.
- Make complaints about the service not meeting their needs.

Organisational abuse

Organisational abuse is the mistreatment, abuse or neglect of a person by a regime or individuals in a setting or service where the person lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights.

Organisational abuse includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or where care is provided

within an adult's own home. This may range from one-off incidents to ongoing ill-treatment.

It can occur through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Organisational abuse occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care and poor practice, which affect the whole setting and deny, restrict or curtail the dignity, privacy, choice, independence or fulfilment of adults with care and support needs.

Organisational abuse can occur in any setting providing health or social care. A number of inquiries into care in residential settings have highlighted that organisational abuse is most likely to occur when staff:

- receive little support from management;
- are inadequately trained;
- are poorly supervised and poorly supported in their work; and
- receive inadequate guidance.

Or where there is:

- unnecessary or inappropriate rules and regulations;
- lack of stimulation or the development of individual interests;
- inappropriate staff behaviour, such as the development of factions, misuse of drugs or alcohol, failure to respond to leadership; or
- restriction of external contacts or opportunities to socialise.

Neglect, and acts of omission

Neglect and acts of omission include ignoring medical, emotional or physical care needs, failing to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves.

Neglect and poor professional practice may take the form of isolated incidents or pervasive ill treatment and gross misconduct.

Neglect of this type may happen within an adult's own home or in an institution. Repeated instances of poor care may be an indication of more serious problems. Neglect can be intentional or unintentional.

Possible indicators of neglect are:

- The person has inadequate heating and/or lighting.
- The adult's physical condition or appearance is poor (e.g. ulcers, pressure sores, soiled or wet clothing).

- The person is malnourished, has sudden or continuous weight loss and/or is dehydrated.
- The person cannot access appropriate medication or medical care.
- The person is not afforded appropriate privacy or dignity.
- The person and/or a carer has inconsistent or reluctant contact with health and social services.
- Callers/visitors are refused access.
- The person is exposed to unacceptable risk.

Self-neglect

Self-neglect entails neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

It is also defined as the inability, intentional or unintentional, to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and wellbeing of the individual and sometimes to their community.

Self-neglect may not prompt a section 42 enquiry, and an assessment will be made on a case-by-case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. However, there may come a point where they are no longer able to do this without external support.

Indicators of self-neglect may include:

- living in very unclean, sometimes verminous, circumstances;
- poor self-care, leading to a decline in personal hygiene;
- poor nutrition;
- poorly healing sores;
- poorly maintained clothing;
- isolation;
- failure to take medication;
- hoarding;
- neglecting household maintenance; or
- portraying eccentric behaviour/lifestyles.

Poor environments and personal hygiene may be a matter of personal or lifestyle choice or other issues, such as insufficient income.

Exploitation

Abuse of adults with care and support needs often occurs within a context of exploitation. Exploitation can be seen as an act where someone will use another person for profit, labour, sexual gratification or some other personal or financial

advantage. As such, exploitation can take many forms and result in different types of harm, such as financial, emotional/psychological or sexual. These types of abuse have been covered in the sections above, but some forms of criminal exploitation are explained in the paragraphs below.

Sexual Exploitation

The sexual exploitation of adults with care and support needs involves exploitative situations, contexts and relationships where adults with care and support needs, or a third person or persons, receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money, attention, understanding, company) as a result of performing sexual activities, and/or having others performing sexual activities on them.

Sexual exploitation can occur through the use of technology without the person's immediate recognition. This can include being persuaded to post sexual images or videos on the internet or send them on a mobile phone with no immediate payment or gain, or being sent such an image by the person alleged to be causing harm. In all cases, those exploiting the person have power over them by virtue of various factors, including their age, gender, intellect, physical strength, and/or economic or other resources.

Criminal Exploitation

Criminal exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person or an adult, including those with care and support needs, into any criminal activity:

- In exchange for something the victim needs or wants, and/or
- For the financial or other advantage of the perpetrator or facilitator, such as to support serious organised crime and/or terrorism, and/or
- Through violence or the threat of violence to ensure compliance.

Because they are more likely to be easily detected, individuals who are exploited are more likely to be arrested and criminalised for criminal behaviour, than those individuals or groups who are exploiting them.

The victim may have been criminally exploited even if the activity appears consensual. Criminal exploitation does not always involve physical contact; it can also occur using technology and/or social media.

Adapted from the Child Criminal Exploitation definition in Working Together:DfE:2018:107 and Home Office:2018:46

Individuals who are being criminally exploited can be involved, linked to or considered to be, by themselves or others, as part of a “gang” (taken from research and publication by Factor et al: 2015). It is important when children or adults, including those with care and support needs, identify or are identified as being affected or involved with gang-related activity that involves the use of actual or threatened violence and/or drug dealing, that professionals also consider that they may be victims of criminal exploitation.

Criminal exploitation is broader than, but often part of, organised crime and county lines.

Organised Crime and County Lines

Organised crime is “serious crime planned, coordinated and conducted by people working together on a continuing basis.

Their motivation is often, but not always, financial gain.” Organised crime groups are “organised criminals working together for a particular criminal activity or activities.” (National Crime Agency: 2018).

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of “deal lines”.

They are likely to exploit children and adults, including those with care and support needs, to move, locally supply and store the drugs and money. They will often use coercion, intimidation, violence (including sexual violence) and weapons

(Home Office:2018:2).

Cuckooing

The term ‘cuckooing’ is “named after the nest stealing practices of wild cuckoos. It describes the situation where a county lines dealer ‘takes over’ accommodation located in the provincial drugs market, using it as a local dealing base.”

(Coomber and Moyle: 2017).

An individual or group can do this by taking over the homes of local adults and families, including children and adults with care and support needs, through an abuse of power or vulnerability by coercion, control and/or force so that they can provide a base for the supply of drugs into the local community. This places the person and/or families at an increased risk of eviction if they are in social or privately rented housing, and isolation from their communities due to the anti-social activity it can create. Cuckooing often forms part of wider ‘county lines’ activity and is also a form of criminal exploitation.

The Context of Criminal Exploitation

Criminal exploitation, including cuckooing, can include several different types of abuse. The types of abuse that can often be present, or relied upon for the purposes of power, include:

- Modern slavery and trafficking.
- Domestic abuse.
- Sexual abuse, including sexual exploitation.
- Physical abuse.
- Psychological abuse.
- Financial abuse.
- Neglect, including self-neglect.
- Emotional abuse.

Criminal exploitation can involve complex and organised abuse involving one or more abusers and several children and/or adults, including those with care and support needs.

Criminal exploitation can take place outside of the family or home environment. It is often a combination of the interplay between the relationships and circumstances both inside and outside of the family/home environment that can lead to a child or person being criminally exploited.

It is now recognised that it is crucial to have a Multi-Agency contextual safeguarding approach and also look at the victim's surrounding environment. An approach should be adopted which considers and addresses the individual needs, risks and protective factors within, including the needs and capacity of parents/carers, and outside, including the impact of social conditions, of the family/home. This approach should also be taken when a child or adult, including those with care and support needs, is being considered as a potential perpetrator.

Vulnerable Groups at Risk

As with other types of exploitation, individuals, both adults and children, who fall into the following vulnerable groups are more likely to be at risk of being criminally exploited. Individuals or families who fall into more than one of the groups, and show the signs of criminal exploitation or cuckooing as outlined below, should be considered at the greatest risk if they:

- are teenage children and young adults;
- have previously or are currently experiencing abuse or other Adverse Childhood Experiences (ACEs);

- lack a safe/stable home environment, now or in the past. For example due to domestic violence, parental substance misuse, mental health issues or criminality;
- are homeless or have insecure accommodation status;
- are exposed to violent crime, gang-related activity and deprivation;
- are socially isolated, lonely or experience social difficulties;
- are economically vulnerable;
- are migrants;
- have a physical or learning disability;
- experience mental health issues or substance misuse;
- are or have been in care, particularly those in children's residential care and those with interrupted care histories; or
- are children excluded from school, either permanently or temporarily, or who are not fully engaged or attending their educational provision or an alternative learning provision (Tapper: 2018).

List adapted from Home Office: 2018

Signs of Criminal Exploitation

There are several signs that indicate that an individual may be subject to criminal exploitation. The more signs that are present for an individual, the greater the level of risk.

Possible signs that indicate an individual is vulnerable to exploitation.

Note: this list is in order, signs at the top are most concerning in respect of risk:

- Persistently going missing from school or home and/or being found out-of-area.
- Unexplained acquisition of money, clothes or mobile phones.
- Excessive receipt of texts or phone calls and/or having multiple handsets.
- Relationships with controlling or older individuals or groups.
- Leaving home or care without explanation.
- Suspicion of physical assault or unexplained injuries.
- Parental concerns.
- Carrying weapons.
- Significant decline in school results or performance.
- Gang association or isolation from peers or social networks.
- Self-harm or significant changes in emotional wellbeing.
- Refusal, resistance to or significant reduction in attendance and/or engagement with services or professional sources of support.
- Secretive behaviour.

List taken from Criminal Exploitation of Children and Vulnerable Adults: County Lines guidance, Home Office, 2018.

Any sudden changes or presence of the signs should be discussed with the individual, where possible, to explore with the reasons behind the behaviour and to try to improve their understanding of the potential risks.

Signs of Cuckooing

Cuckooing not only has an impact on the individual or family whose home has been taken over, but also the neighbours and neighbourhood of the property that has been cuckooed.

Therefore, signs of cuckooing may be more evident to neighbours than professionals in the first instance. This means that comments and reports from neighbours must be noted and considered by professionals working with individuals or families.

Cuckooing can take place in rented or social housing, including multiple occupancy housing provision. However, homeowners, particularly those in the vulnerable groups may also be targeted.

Possible signs that may indicate that an individual or family's property has been cuckooed:

- Unknown people frequently staying at/moving into the property; often described by the individual or families as "friends".
- The individual or family moving out or regularly staying away from the property while the unknown individuals remain.
- New vehicles regularly parking or remaining outside the property.
- An increase in the number of comings and goings throughout the day and/or night, including people/vehicles that have not been seen before.
- An increase in anti-social behaviour, such as property damage, littering, regular loud music or 'parties', or evidence of verbal or physical aggression, in and around the property.
- The individual/family refusing entry or restricting access to certain parts of the property to neighbours, friends or professionals, particularly if they have allowed it before.

As with all areas of exploitation, referral in a timely manner is essential. Such options could include:

- The Salvation Army, who can provide specialist support including access to confidential legal advice, health care, counselling, educational opportunities, financial support and support with accessing housing and employment.
- Police involvement and intervention.
- On-going support from Mental Health services.

- Housing providers.
- Any physical health services.
- Community services and resources.
- Education services.

If have any concerns about the welfare of a child or adult at risk, you must act. Do not assume that someone else will.

If you see something, say something

Appendix C

The context of Eden Project safeguarding Policy

The Care Act 2014 - sets out six key principles of adult safeguarding: empowerment, prevention, proportionality, protection, partnership and accountability. We recognise all of these principles and believe that safeguarding should always be about the individual: it must be person led, focused on real outcomes and should try to empower people with capacity to make their own choices.

Empowerment - People being supported and encouraged to make their own decisions and with informed consent.

"I am asked what I want the outcomes to be from the safeguarding process and these directly inform what happens."

Prevention – It is better to take action before harm occurs.

"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

Proportionality – The least intrusive response should be identified and must be appropriate to the risk presented.

"I am sure that the professionals will work in my interest and they will only get involved as much as needed."

Protection – Support and representation for those in greatest need.

"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

Partnership – Communities have a part to play in preventing, detecting and reporting neglect and abuse.

"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."

Accountability – Being accountable and transparent about the safeguarding practices that are used to support people.

"I understand the role of everyone involved in my life and so do they."

Appendix D

Mental Capacity Act 2005 (MCA)

The MCA 2005 was enacted to protect individuals and their freedoms. It empowers individuals to retain freedom of choice and, when choices cannot freely be made, it seeks to make sure that decisions are taken in the individual's best interests. Any decision taken on behalf of an individual who lacks capacity to make a specific decision must be based on their wishes so far as is possible. Best interest rules must be followed when making decisions for an adult who lacks capacity.

The Act is also a useful guide to interactions with people who may lack capacity. Everyone working with someone who might be considered to be vulnerable must have a working knowledge of the Act. The Act also complements other policies and its ethos, therefore, it is included here both for information purposes and to note that 's volunteers, staff and Trustees will act within its principles at all times.

Part 1 of the Mental Capacity Act 2005

The principles outlined in the Mental Capacity Act are:

A person must be assumed to have capacity unless it is established that they lack capacity.

A person is not to be treated as unable to make a decision unless all practicable steps to help them make a decision have been taken without success.

A person is not to be treated as unable to make a decision merely because they make an unwise decision.

An action or decision taken, under this Act for, or on behalf of a person who lacks capacity, must be done, in their best interests.

To ensure that we minimise any restrictions of persons rights and freedoms, all options must be explored before an action, or decision is made on their behalf,

People who lack capacity

For the purposes of this Act, a person lacks capacity in relation to a matter if, at the material time, they are unable to make a decision for themselves in relation to the matter because of an impairment of, or a disturbance in the functioning of, the mind or brain.

It does not matter whether the impairment or disturbance is permanent or temporary.

A lack of capacity cannot be established merely by reference to -

(a) a person's age or appearance, or

(b) a condition of theirs, or an aspect of their behaviour, which might lead others to make unjustified assumptions about their capacity.

The Act also introduced Independent Mental Capacity Advocates who can be appointed if circumstances warrant an independent voice for someone considered to lack capacity.

Appendix E

Deprivation of Liberty Safeguards, Code of Practice 2008

This sets out key provisions for the protection of those in some residential settings and hospitals who are deemed not to have capacity.

It is a set of safeguards which ensure individuals are not unnecessarily deprived of their freedoms. Should a situation arise where a deprivation of liberty is required, such as to fulfill medical treatment, it must usually be authorised by the Local Deprivation of Liberty Team or, ultimately, the Court of Protection. It is the responsibility of our organisation to obtain the correct authorisation prior to any deprivation of liberty.

Appendix F

Safeguarding Vulnerable Groups Act 2006 –

The purpose of this Act is to prevent those who may cause harm from working or volunteering in roles where they are in contact with adults at risk.

The act introduced the Disclosure and Barring Service (DBS) 2012, undertakes basic, standard and enhanced checks to ensure that people who work with adults at risk are safe to do so. Basic DBS Checks can be obtained from the gov.uk website and Enhanced Checks can be obtained directly from DBS Check Online. A DBS check will be sought for everyone who we employ to work with adults in our care, or adults at risk with whom we come into contact through our organisation.

Appendix G

The Human Rights Act 1998

This gives legal effect in the UK to the fundamental rights and freedoms contained in the European Convention on Human Rights (ECHR). The Act applies to all public authorities, such as central government departments, local authorities and NHS Trusts, and other bodies performing public functions, such as private companies operating prisons. These organisations must comply with the Act, and an individual's human rights, when providing a service or making decisions that have a

decisive impact upon an individual's rights. The Care Act extends the scope of the Human Rights Act. This incorporates registered care providers, both residential and non-residential, providing care and support to an adult, or support to a carer, where the care and support is arranged or funded by the Local Authority, including Direct Payment situations (Local Government Association, 2014). It does not incorporate entirely private arrangements concerning care and support.

Although the Act does not apply to private individuals or companies, except where they are performing public functions, public authorities have a duty to promote the human rights of individuals and this entails a duty to stop people or companies abusing an individual's human rights. For example, a public authority that knows an adult is being abused by their privately funded carer has a duty to protect the adult from inhuman or degrading treatment.

The Human Rights Act covers everyone in the United Kingdom, regardless of citizenship or immigration status.

Appendix H

Request for information in order to assist an investigation

Statutory agencies, such as the Police or Local Authority, recognise that adults have a general right to independence, choice and self-determination, including control over information about themselves. However, they are clear that, in the context of adult safeguarding and when investigating crime, these rights can be overridden.

In certain circumstances, such as in emergency or life-threatening situations, it may be warranted to share relevant information without consent.

The Care Act 2014, particularly section 45 - the 'supply of information' - covers the responsibilities of others to comply with any requests for information from the Safeguarding Adults Board for the purposes of progressing an enquiry recognises our responsibilities for information sharing and will always seek to comply with such requests, where properly requested, in order to:

- prevent death or serious harm;
- coordinate effective and efficient responses;
- enable early interventions to prevent the escalation of risk;
- prevent abuse and harm that may increase the need for care and support;
- maintain and improve good practice in adult safeguarding;
- reveal patterns of abuse that were previously undetected and that could identify others at risk of abuse;
- identify low-level concerns that may reveal people at risk of abuse;

- help people to access the right kind of support to reduce risk and promote wellbeing;
- help identify people who may pose a risk to others and, where possible, work to reduce offending behaviour; and; reduce organisational risk and protect reputation.

If there is any concern about sharing information, we will seek legal advice.

Appendix I

Preserving Evidence

In cases where there may be physical evidence of crimes, for example physical or sexual assault, contact the police immediately, for advice on preserving evidence.

As a guide:

- Where possible, leave things as and where they are. If anything has to be handled, keep this to an absolute minimum.
- Do not clean up. Do not touch anything you do not have to. Do not throw anything away which could be evidence.
- Do not wash anything or in any way remove fibres, blood etc.
- Preserve the clothing and footwear of the victim.
- Preserve anything used to comfort or warm the victim, like a blanket.
- Note in writing the state of the clothing of both the victim and person alleged to have caused the harm. Note injuries in writing. As soon as possible, make full written notes on the conditions and attitudes of the people involved in the incident.
- Take steps to secure the room or area where the incident took place. Do not allow anyone to enter until the police arrive.
- In addition, in cases of sexual assault.
- Preserve bedding and clothing where appropriate, do not wash them.
- Try not to have any personal or physical contact with either the victim or the person alleged to have caused the harm. Offer reassurance and comfort as needed, but be aware that anyone touching the victim or source of risk can contaminate evidence.

Appendix J

Incident Report Form



Name of child or adult at risk Date of birth

.....

Parent/teacher/carer's name

Home Address (and Phone no. if available)

.....

.....

Holiday Address details

.....

.....

Any relevant medical issues

.....

Are you reporting your concerns or those of somebody else? Give details.

.....

.....

Brief description of what has prompted the concerns: include dates and times of any specific incidents

.....

.....

Describe appearances and any physical signs? Behavioural signs? Indirect signs?

.....

.....

Has anyone else been involved - they must also fill out an Incident Report Form

.....

Have you spoken to the child or adult at risk? If so, record exactly what was said.

.....

.....

.....

Have you spoken to a parent/teacher carer? If so record exactly what was said?

.....

.....

.....

Is anyone identified as the alleged abuser? Give details; including their relationship the with other people involved.

.....

.....

Record the views and wishes of the alleged victim

.....
.....

Are there any issues with their mental capacity?

.....

Have you consulted anybody else or taken any actions? Give details

.....
.....

Any further details you want to include

.....
.....

Your name and position

.....

Name of Safeguarding officer who (will) received the report

.....

Signature

Today's date

Time of disclosure

.....

.....

.....

For more information see

[\(20+\) GDPR Policies / Workplace](#)

Retention of Records – information storage page 18

Appendix K

Eden Project's Disclosure and Barring Service Policy and Procedure



This procedure is designed to outline the process for dealing with criminal records and the use of DBS disclosures in recruitment and employment, in accordance with the Disclosure and Barring Service recommendation

Background

The Rehabilitation of Offenders Act, 1974 (ROA) was introduced to ensure that ex-offenders who have not re-offended for a specified period of time since their date of conviction are not discriminated against when applying for jobs. Unless the job they are applying for is exempted, ex-offenders are no longer required to disclose to organisations convictions that are spent.

Posts exempt from the Act include those involving unsupervised access to children, young people, the elderly, disabled people, alcohol and drug users and the chronically sick. These posts will be subject to additional checks via the Disclosure and Barring Service (DBS) to assist us in assessing candidates' suitability for such posts.

Eden Project aims to ensure that it treats all applicants for jobs who have a criminal record fairly and does not discriminate unfairly against candidates with either a spent or an unspent conviction. At the same time the policy aims to safeguard Eden Team members, students, visitors and service users.

Exempted jobs with a requirement for Disclosure

To determine whether a new post has a requirement for Disclosure, a risk assessment should be carried out by the recruiting manager in consultation with the Human Resources Team.

Appendix 1 of this policy lists the range of posts that are currently considered as requiring Disclosure. This list is not exhaustive and may be subject to change in line with legislative and/or Eden's specific requirements. This list is in accordance with the DBS categories and relates to posts:

- working unsupervised with children (i.e. persons aged under 18)

- working with unsupervised vulnerable adults (i.e. persons aged 18 or over who have conditions of the following types: i) a learning or physical disability; ii) a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or iii) a reduction in physical or mental capacity. Eden also determines individuals who may be in distress as vulnerable.
- working within certain professions.
- Requirement of some funded projects where contact may involve vulnerable participants.

For jobs exempted from the provisions of the ROA, it will be made clear in the vacancy that the post is subject to Disclosure. Candidates will be encouraged to submit appropriate information confidentially to the Human Resources Team. Where a post is exempted from the ROA, the candidate may be asked at interview to discuss any offences.

Because an employee may change roles during employment, it is also a contractual term that if a role requires a DBS check that this must be undertaken, details shared with Eden and the employee must also register for the update service on receipt of their outcome certificate.

Where a candidate is made an offer of employment which is subject to a criminal record check, then a Disclosure application will be made to the Disclosure and Barring Service (DBS). If this shows information that appears to make the candidate unsuitable for appointment, then the applicant will be informed of the reasons in writing. If there is a lack of clarity in the information received or it appears to contradict that previously submitted by the candidate, then s/he will be invited to discuss this before a final decision regarding the appointment is made. Only convictions that are relevant to the person's suitability to perform the job in question will be considered.

Once the DBS is completed, the Team Member will receive a copy of this. They are required to provide a copy of this to the Human Resources Team at Eden on receipt of the document to be held on their personnel file. On receipt of the DBS Certificate, the Team Member MUST register within 30 days for the online update service to ensure future updates in line with the policy are able to be undertaken.

Non-exempted jobs

Applicants are not required to disclose convictions that are 'spent' under the Act. (Cautions, reprimands and final warnings are regarded as spent as soon as they are issued).

The suitability of a person with a criminal record will vary depending on the nature of the job and the circumstances of the conviction. An assessment of the applicant's skills, experience and the nature of the convictions should be weighed against the potential risks associated with the job. In carrying out this risk assessment Eden will take into account the following issues:

- whether the conviction or other matter revealed is relevant to the position in question
- the nature and seriousness of any offence(s) or other matters revealed
- the length of time since the offence(s) or other matters occurred;
- the number and pattern of offences
- the age of the offender when the offence(s) occurred
- what (if anything) has changed since the offending behaviour or other relevant matters took place
- the circumstances surrounding the offence and the explanation(s) offered
- the responsibilities of the position
- the vulnerability of the customer group
- whether the offence has since been decriminalised

If an individual is appointed and it subsequently emerges that they had an unspent conviction that was not disclosed, then this will be treated as a serious disciplinary matter.

Existing Team Members with a criminal record

While DBS Disclosures are primarily used in the recruitment and selection process, it is also possible that an individual's role may change to one which requires a DBS Disclosure. If this process reveals a criminal history, then Eden will assess whether or not this prevents them continuing in their present job or moving to another job. In carrying out this process Eden will examine the factors set out above. In circumstances where, after an appropriate assessment is carried out, it is deemed that they cannot continue in their present job, then Eden will consider re-deployment possibilities.

Rechecking

Disclosures relate only to offences committed at the time of application. However, in line with Eden's responsibility to protect the interests of persons aged under 18 and vulnerable adults, Eden requires Team Members in relevant roles to make subsequent disclosure applications. These will normally be required at intervals of 3 years; although Eden reserves the right to require Team Members to make further disclosure applications at any time. To enable this, employees MUST register for the online update service with DBS to allow a share code to be generated and provided to Eden for the updated DBS to be undertaken.

Training

Eden will ensure that team members involved in leading the recruitment and selection of staff are aware of this policy and its provisions.

Retention and Disposal of Disclosure Information

Storage and Access

Disclosure information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled.

*See [Retention or Records page 18](#)
[\(20+\) GDPR Policies / Workplace](#)*

Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties.

Usage

Disclosure information may only be used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, Disclosure information will not be kept for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, the DBS will be consulted and full consideration should be given to the data protection and human rights of the individual before doing so.

Disposal

Once the retention period has elapsed, any Disclosure information will be destroyed by secure means, i.e. by shredding. Photocopies and/or other images of the Disclosure or any copy or representation of the contents of a Disclosure will not be kept. However, a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken will be retained.

Appendix 1: Posts Requiring DBS Disclosure

The following Eden posts are currently considered as requiring DBS Disclosure. This list is not exhaustive and may be subject to change in line with legislative and/or Eden's specific requirements:

- Team Members working alone with work experience students, but not all Team Members who supervise work experience students
- Schools Team Members
- Paramedics
- Child Protection Officers
- Self Employed Artists (ask the Human Resource team for guidance)
- Projects that involve a considerable amount of time working directly with vulnerable people.
- Finance Team

To determine whether a new role requires DBS disclosure, the line manager, in consultation with the Human Resources Team, should consider:

- Could duties include unsupervised contact with, or access to, persons aged under 18 and/or vulnerable adults
- Could duties involve unsupervised access to, or regular contact with, persons aged under 18 and vulnerable adults in sensitive situations

The DBS also provide guidance regarding which roles are eligible for DBS disclosure.

www.gov.uk/government/collections/dbs-eligibility-guidance

Appendix L

Missing Vulnerable person protocol

Ensuring visitor welfare, health and safety and experience

This protocol applies to any vulnerable person (it could be a child, an elderly person, or an adult with difficulties).

The welfare of the vulnerable person is paramount.

They can go missing or lose their guardians / parents / teachers / carers on a frequent basis throughout the year. As a staff member, you have equal responsibility for both ensuring their safety and locating the whereabouts of the adult concerned. **In the event that a vulnerable person goes missing or is reported lost**, please follow the correct procedure as detailed below.

In any such case, it is vital that prompt action is taken.

1. If a vulnerable person is reported missing by a guardian / parent / teacher / carer, the first question that needs to be asked is the last known whereabouts of them and the time.
2. Once the last known whereabouts and the time have been established, obtain a detailed description of the clothing they were wearing.
3. Notify the Duty Manager or Steward Team Leader. When calling on the radio **IT IS VITAL** that the following protocol be used: "Come in Duty Manager"...*"Duty manager receiving"*... "We are looking for a missing vulnerable"... **NEVER GIVE OUT A NAME OVER THE RADIO**... "s/he is x-age and wearing... (give any other distinguishing information that you can) and was last seen..."
4. The Duty Manager or Steward Team Leader will then come to your location and co-ordinate the search with other stewards. The guardian / parent / teacher / carer will remain with a steward to ensure that once the vulnerable person is found they can be re-united quickly and efficiently, with minimum distress.
5. Once the vulnerable person has been located, the Duty Manager or Steward Team Leader will announce that they have been re-united and tell all Stewards to stand down.
6. In the event that the vulnerable person (again, suggest we stick to using 'child' here for consistency) is not found within approximately 15 minutes the Duty Manager will consider putting out a tannoy announcement.

It is natural that their guardian / parent / teacher / carer will be frightened and distressed. It is your responsibility to reassure them and let them know that we have a very good procedure in place.



In the event that a child approaches a member of staff the following protocol should be used:

1. It is likely the child will be distressed. Offer reassurance, but do not pick the child up.
2. **IT IS VITAL** to radio another member of staff, the opposite sex from yourself, as quickly as possible.
3. Establish the last known whereabouts of their guardian / parents / teacher / carer and the time.
4. Try to establish a description of the adult – gender, hair colour, clothing – and how many people are in the party altogether.
5. Radio the Duty Manager or Steward Team Leader... "Come in Duty Manager"...*"Duty manager receiving"*... "I have a missing vulnerable with me"...
NEVER GIVE OUT A NAME OVER THE RADIO.
6. The Duty Manager or Steward Team Leader will then come to your location to co-ordinate the search.
7. Whilst you are with the vulnerable person keep reassuring him / her and try and keep him / her occupied.
8. Make sure that another member of staff, of the opposite sex, remains with you throughout.

Appendix M

Photo/Video/Website Consent Form



You or child is involved in an Eden Project event. We often take photographs, or make video recordings, of young people at the Eden Project or involved in Eden activities. We may use these images on the Eden Project websites, social media channels, in printed publications, or in presentations for the general public that we produce.

We may also share images with the press/media or partner organisations for promoting the Eden Project and its events.

To comply with the General Data Protection Regulation (GDPR), we need your permission before we can photograph or make any recordings. Please sign, date and return the form.

I give permission for my, my child's image to be stored and used. I have read and understood the conditions of use on this form:

Subject name: (block capitals)	
Name of parent or guardian if applicable: (block capitals)	
Subject, parent or guardian's signature, if applicable:	
Date:	

Conditions of use

1. The Eden Project will not use full names or any other personal details of any individual in a photograph on our websites or any of our printed publications without the specific prior permission.
2. The Eden Project may use group or class photographs or footage with very general labels, such as "Eden workshop".
3. The Eden Project will only use images of children who are suitably dressed, to reduce the risk of such images being used inappropriately.
4. If images are taken by local press/media, or parents/guests, the Eden Project will not have control of these images.

Please refer to the Eden Project privacy policy for information on how we store and process data responsibly. www.edenproject.com/privacy-policy

Eden Ref: Event

Date:

Group Name:

Ref:

Notes:

Appendix N

Acting in Loco Parentis, Parental Consent Form



The Eden Project is acting in Loco Parentis, acting in place of a parent of a person under 18.

Child's full name

Child's Date of Birth

.....

.....

Name of the person legally responsible for the child.

.....

Address line 1.

.....

Address line 2.

Postcode

.....

.....

Next of kin and relationship.

.....

Emergency contact name, address and telephone number (1)

.....

Emergency contact name, address and telephone number (2)

.....

GP name and telephone number.

.....

Does your child suffer from any health issues or take any prescribed or over the counter medicines??

.....

Does your child suffer from any allergies? E.g. Food / medication / plants / animals.

.....

Does your child have any dietary restrictions or special requirements?

.....

By signing this you agree that Eden Project staff will be acting in Loco Parentis i.e. providing the reasonable care that a parent would in similar circumstances.

Signature.

Appendix O

Running Events - Good Practice

It is our duty and legal obligation to ensure that we do everything we can to ensure that events are safe and well managed.



- Appoint a designated leader, responsible for supervision, welfare, safety and behaviour of the group at all times.
- All activities must be risk assessed and checked by Eden's Safety Officer. Refer to our **Health and Safety policy**, [Photo consent, images and media page 26](#) and [Appendix M page 61 Photo/Video/Website Consent Form](#)
- Ensure the Duty Manager and the Education Team and the Development Team are notified about all events and activities involving young people and adults at risk.
- Leaders must brief other members of staff, carry a list of the children in their group.
- Older children (12+) exploring in small groups should have regular rendezvous points.
- See age policy/ guidance.
- If an incident arises, contact a Duty Manager immediately and follow our emergency procedures.
- If there is a medical incident, contact the Duty Manager.
- If possible, groups should be met, given an introduction to Eden which includes a health and safety briefing.

It is not safe practice to:

- Spend time with people at risk alone and away from others.
- Take children or people at risk of being vulnerable alone on car journeys, however short.

If these situations are unavoidable, you should have a DBS check, notify the adult acting in loco parentis, your manager or a Safeguarding Officer informing them of the time you pick up the person and then drop them off.



Working with External Organisations on site

External organisations visiting the Eden Project, are legally responsible for their care and welfare. It is our role to ensure that their trip is enjoyable and safe. A member of Eden staff must act as a contact.

- At least one member of staff leads on Safeguarding, raising awareness the group and accompanying staff and parents.
- Eden has a contact number for the group leader who is responsible for supervision welfare, safety and behaviour of the group.
- The organisation carries insurance to run events with young people and adults at risk.
- The staff are qualified and experienced to run events with young people and adults at risk.
- Any extra activities are risk assessed and checked by a member of the Eden Project Education Team. PLEASE CHECK
- All members of the team should carry a list of the names of the group. If older children (12+) are being allowed to explore in groups they should have regular rendezvous established.
- Check age policy.
- In the event of an incident or injury, the on-site Eden team must always be contacted, who will take appropriate action.
- The organisation has adequate provision for acting in Loco Parentis and Image consent policies where appropriate.
- The Education Team/ Development Team know about the event.
- If possible, all school groups should be met, given an Eden introduction which includes a health and safety briefing, and a base.

For further information contact the education team **01726 811913**

Appendix Q

Working with people under 18 yrs. old

Staff should be aware that everyone under the age of 18, **including students' volunteers and work placement students**, are covered by our Safeguarding Policy, so staff should be aware of:



Appropriate Behaviour and Conduct

Whilst it is important to reassure a person who may be nervous in a new environment, it is important not to be over-familiar. This will help to avoid any misunderstandings. Where possible, avoid being on your own in an isolated or closed environment with a young person.

Travel

Avoid giving a lift or travelling alone with a young person or someone who has become vulnerable. If these situations are unavoidable, you should have a DBS check notify the adult acting in loco parentis, carer, your manager or a Safeguarding Officer, informing them of the time when you pick up the person and then drop them off.

Touch

Where possible avoid physical contact. However, in some cases you may need to touch the person due to the nature of the work being undertaken. If this is the case, it is important to check that they understand why; and that they are comfortable with it. Keep these situations to a minimum and whenever possible, make sure there is another member of staff present.

Staff support

It is recommended that young staff members has a mentor in their team and are aware of the relevant Policies and Procedures

Appendix R

Responding to Mental Health concerns and incidents



Mental Health Crisis Management Process –

This process should be followed at Eden Project in the event of somebody behaving in a way which causes concern for their welfare, wellbeing and/or safety or that of someone else.

This includes:

- someone disclosing that they are having suicidal or paranoid thoughts
- have plans to harm themselves
- displaying evidence of having recently tried to self-harm
- are intoxicated (drugs or alcohol)
- extremely low mood and hopelessness / despair
- disclose that they have been engaging in dangerous or extreme risk-taking behaviour
- someone is verbally and/or physically aggressive and makes others feel frightened or unsafe.
- Someone discloses that they wish to hurt or harm someone else or believe that they have been told to hurt/harm someone else.

1) Immediate Risk of Harm to the Individual

Ring 999 and request an ambulance

- Radio or phone the Site Manager.
- One team member to support the person at risk and another to manage the public / rest of the group / call for back up.
- If possible and if it doesn't cause further distress, move the person to a quiet location. If this is not possible, move others to a different location.
- Apply mental health first aid techniques in supporting both the individual and the rest of the group
- Apply basic first aid if necessary.
- With other team colleagues, debrief the remainder of the group or public i.e. offer reassurance that the individual is now receiving professional support.

2) Significant Concern for Welfare of an individual

If the team is concerned about someone when they leave the site, the following procedures should be followed:

If the individual is a guest or a client

- Encourage the person to move to a quieter space or move the rest of the group /public as required.
- Ideally, a person with a strong working relationship, should ask if everything is okay and if they would like to talk about it. It is ok to express concern, ask what they are going to do after the session and how they might seek support for themselves.

Apply Mental Health First Aid techniques to explore where someone is at and how they might like to be helped.

- If there is a significant concern for someone's welfare and they don't show any insight into this and doesn't want to engage in discussion, a judgement should be made about ringing the Mental Health Crisis Team especially if there are concerns about the individual leaving the site.

Mental Health Crisis Intervention Team: 0800 038 5300

If the individual is a client

- Try to agree a small plan of action and offer to help put this in place as appropriate, e.g. asking their emergency contact to meet them, ringing their GP or the person who referred them. If there isn't another professional involved, call the Mental Health Crisis Intervention team.
- Contact the Mental Health Crisis Team for immediate concerns, e.g., you are so concerned about someone's welfare that you don't want them to leave the site unaccompanied. The GP can be contacted to be informed subsequently.
- Contact their GP or the Mental Health Crisis team if you are concerned but there isn't an immediate urgency. This might result in a referral or suggested self-referral to the crisis team.

3) Managing someone who is intoxicated

For the safety of everyone, individuals cannot enter the Eden Project under the influence of drugs or alcohol.

- A member of staff helps the individual work out how they will get home safely. (So long as the person doesn't pose a threat to staff or others – please see No 4 if this is the case).

If the individual is a client

- If someone arrives in an intoxicated condition, they will not be allowed to join the group.
- Other staff should manage the rest of the group and move them away from the individual.

- If the person isn't going to be able to get home independently call their emergency contact number to ask them to pick them up.
- If there isn't an emergency contact nearby, contact either the person that has referred or another professional involved with them.
- In the event that neither course of action is an option, ring the Drug and Alcohol Action Team 24-hour helpline: [Drugs - Safer Cornwall](#)
Telephone 0333 2000 325.

4) Dealing with verbal and/or physical aggression

- Radio site manager and site security office and request immediate assistance.
- Provide a description of the individual in case they move away from you
- Phone the police.
- Remove the rest of the group or the public to a place of safety.
- The safety of everyone else is the first priority and someone who is physical aggressive should not be engaged with or tackled.

After the event (all situations)

Make contemporaneous notes that detail the incident:

- the lead up to it,
- what happened,
- action taken to mitigate the risk and support provided to all group members.
- Include what was said, by whom and use the words of the person in distress if possible.
- A factual dated and signed account, with approximate timeframes.
- Team manager to convene the team to debrief immediately after the event. i.e. after the emergency has been dealt with, notes recorded and the session closed.
- Team manager to ensure appropriate escalation and reporting procedures are followed.
- Team manager to arrange for further support for team members as required.

Appendix S

Client Emergency Information Sheet

In case you are unwell or have an accident whilst you are with us, we need to take some basic information to ensure that we provide you with the most appropriate support.



Name:
DOB:
Telephone Number:
Address:
Postcode:
Emergency Contact Details
Name:
Phone number:
Relationship:
Doctor's Details
GP/Surgery Name:
Phone Number:
Surgery Address:
Details of medical conditions or allergies. (Details of allergies, long term conditions and mental health needs; medication taken or required in an emergency, such as an epi pen for anaphylactic shock)
Other Critical Information (to support in an emergency) (E.g. triggers and agreed de-escalation plans, where in place – e.g., like time with a trusted person in a quiet space. Physical things like the person has a pace-maker and defibrillation should not be attempted).
Referrer Details
Name:
Phone number:
Email:
Organisation and Role:

Eden Site Manager – 07816 884784

Eden Control/Security – 01726 811948

Emergency Contact Numbers to Access Mental Health Support

In an emergency if someone is at immediate risk of harm or is hurting themselves, ring **999 and request an ambulance.**

Inform the duty site manager: 07816 884 784

Eden Control/Security: 01726 811948

Cornwall **Mental Health Crisis Intervention Team: 0800 038 5300** (24/7 free patient crisis line)

Cornwall Partnership Trust **Professional's Advice Line: 01209 881 999** (24/7)

NHS Mental Health Access Hubs:

Telephone Number: Freephone 08081 966798

(Hours of operation: 24 hours a day, seven days a week).

Team back up support

(Please call upon back up support from the team to help support the rest of the group and/or staff team as required)

Appendix T

Professional Boundaries Policy and Guidance



Introduction

This document sets out Eden Project's principles and guidance on building relationships and specifically professional boundaries with clients and adults at risk.

Policy statement

It is essential that staff establish rapport and support clients, but are responsible for maintaining appropriate professional boundaries.

There isn't a fixed definition for 'professional boundaries' but at the Eden Project we aim for acceptable practice, clarity and consistency across our activities.

This guidance applies to all contact with clients.

The Context of this policy

This document is part of the Eden Project's, Safeguarding Policies, it sets out Eden Project's principles and guidance on professional boundaries with clients and adults at risk.

Definitions

For the purpose of this policy 'staff' refer to volunteers and paid members of the Eden Team. 'Clients' are visitors, or people engaged in a project hosted by Eden. Please note: individuals from any group can, potentially become 'adults at risk'.

For more details see page 8 and Appendix A page 31

Definition of the term 'vulnerable adults/adults at risk.'

And Appendix B page 31

Recognition and definitions of Abuse and Neglect

Responsibilities

The Team Manager has overall responsibility for ensuring that these guidelines are followed by monitoring team and individual practice.

All staff are responsible for maintaining appropriate professional boundaries and raising any issues or training needs with their managers and Safeguarding Team.

Everyone is responsible for challenging and addressing issues when it is perceived that standards aren't being maintained.

Context of the policy

This policy sits within the Safeguarding Policies Procedures and Guidelines and reflects the values of the other policies that are referred to.

Working with Clients

Staff must never confuse befriending with friendship.

- Boundaries define our behaviour, enabling staff and clients to develop a supportive and caring relationship, based upon trust, respect and appropriate uses of power.
- All relationships must focus on the needs of the client, changing the focus towards needs of the staff is an unacceptable abuse of power.
- Staff may develop an attachment with a client, this must never breach professional boundaries.
- Staff should discuss any situations with their manager.

Befriending a client – a professional relationship, building trust to meet a client's needs.

Friendship – focuses on the needs of both parties and is potentially an abuse of power.

Counselling – staff must differentiate between being a counsellor and using counselling skills. Staff should only counsel if they are trained, as part of their role, otherwise, staff should signpost clients towards appropriate services

Providing advice – beyond a job role, should only be offered on request, if it doesn't feel right, inform the client, and signpost them to appropriate support. Any concerns should be referred to a Safeguarding officer.

Influence – Staff must not influence clients with their own beliefs and personal values.

Approachability – Staff should be approachable, open to challenge and criticism, and engage in meaningful dialogue. Clients must be able to access support and make complaints.

Privacy – Staff must respect client's rights to privacy, and be sensitive and responsive to any personal and cultural needs.

Inappropriate Personal Disclosure – Staff should not divulge any personal information about themselves or other staff. Refer to the Confidentiality section for more details.

Concealing Information from Colleagues about Clients – Staff should not conceal relevant information about clients from colleagues including.

- Personal information.
- Reports of violent or critical incident/issues.
- Safeguarding issues.

Touch

Physical contact should only occur as part of specific activities, and with the client's consent, all staff should ensure consistency and clarity to avoid situations that may be misinterpreted as affection or favouritism.

Financial relationships

Staff must not enter into any financial relationships with clients.

- Entering into financial transactions.
- Lending possessions to clients.
- Giving or accept gifts from clients.
- Accepting donations to the project without agreement of the project manager.
- Handling money on behalf of clients.
- Becoming a trustees, beneficiaries or executors to the client's wills.

Relationships and contact with clients within work

Managers must be informed staff know a client outside the professional context. Manager will discuss confidentiality and agree a plan moving forward.

Relationships and contact with clients outside of work

Staff should not

- Allow clients to visit/reside in their homes.
- Develop relationships with relatives or friends.
- Share their, or colleagues personal contact details.
- Encounters with clients out of hours should be pleasant, natural and civil.
- Staff should not approach clients and adults at risk.
- Arrange out of hours contact with client.

Discussing others

'Gossip' and assumptions should be actively discouraged. Staff mustn't share personal details about other staff.

Other circumstances

Staff mustn't hold or administer medication unless authorised and trained to do so. Staff should not allow clients to travel in their personal vehicles unless in an emergency situation.

These guidelines are not exhaustive, staff should avoid opportunities for actual or perceived exploitation of a professional relationship and identified situations should be discussed with their manager.

What to do if a boundary related issue arises

Staff may find their relationship with a client is compromised, crossing between good and bad practice may not always be intentional or obvious.

Staff should inform their Line Manager as soon as possible; other staff in the team, must be notified of a compromised situation for two reasons:

- They can maintain consistent practice with that client or adult at risk.
- To ensure that any action taken is open and transparent.

A record of the incident / situation must be made; to ensure openness and consistency, signed dated and secured in the client's folder.

[\(20+\) GDPR Policies / Workplace](#)

For more information see Retention of records page 18

- Issues should be discussed regularly; specific training may be appropriate.
- Certain circumstances will require flexibility so should be recorded, risk assessed, and agreed with the project manager.
- This should ensure transparency, and managed positive risk taking
- Role based risk assessments should be updated by Line Managers to address potential risks to clients.

Significant and/or repeated breaches of this policy will lead to disciplinary action, up to and including dismissal.

Review and monitoring

The Project Manager is be responsible for monitoring these guidelines.

Transgressions will be reviewed in partnership with the lead Safeguarding Officer.



CHILD PROTECTION AND SAFEGUARDING POLICY, PROCEDURES AND GUIDELINES FOR EDEN PROJECT

Name of Organisation: **Eden Project**

Purpose:

To inform all members of staff of their responsibilities when working with young people

Eden Project has appropriate public liability insurance with no exclusions for child abuse.

Approval of policy and procedures given by:

A handwritten signature in black ink, appearing to be a stylized 'Z' or 'J' followed by a horizontal line.

Date 8th April 2024

Approval of the safeguarding action plan and its implementation given by:

A handwritten signature in black ink, appearing to be a stylized 'Z' or 'J' followed by a horizontal line.

Date 8th April 2024

This Policy will be reviewed in April 2025 and amended if and when national guidelines and policies change.

