HearSay Charitable Trust

Safeguarding Policy and Procedures for Children and Adults at Risk

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1. Introduction

HearSay Charitable Trust – known as the Trust throughout this policy, is committed to safeguarding and promoting the welfare of all children, young people, and adults at risk who access our services. Safeguarding is integral to counselling practice and underpins all ethical, clinical, and organisational work.

We recognise safeguarding as both protection from harm and the promotion of wellbeing, grounded in listening to lived experience and working collaboratively to achieve the best possible outcomes.

This policy applies to all staff. In this policy, the definition of staff includes all counsellors, volunteers, trustees, and anyone working on behalf of the Trust.

2. Legal and Ethical Framework

2.1 This policy is informed by current UK legislation and statutory guidance, including:

- Children Act 1989 and 2004
- Children and Social Work Act 2017
- Working Together to Safeguard Children (2026)
- Care Act 2014 and Care and Support Statutory Guidance
- Mental Capacity Act 2004
- Domestic Abuse Act 2021
- Sexual Offences Act 2003
- Data Protection Act 2018 and UK GDPR
- Safeguarding Vulnerable Groups Act 2006
- Prevent Duty Guidance (2023)
- Female Genital Mutilation Act (2003)

2.2 This policy aligns with the BACP Ethical Framework, including duties relating to safeguarding, confidentiality, and working in the client's best interests.

3. Child-Centred and Person-Centred Safeguarding Principles and Practice

3.1 Safeguarding practice at The Trust is child-centred and person-centred.

3.2 The Trust adopts the six safeguarding principles: Empowerment, Prevention, Proportionality, Protection, Partnership, Accountability

3.3 The Trust will:

- Place the voice, lived experience, and wellbeing of the child or adult at the centre of all decisions
- Ensure safeguarding decisions are informed by the views, wishes, and experiences of the individual wherever possible
- Actively listen and respond to verbal and non-verbal communication
- Use professional curiosity to understand the full context of a person's life
- Consider the impact of trauma, neurodivergence, and communication differences
- Build safe, trusting therapeutic relationships

4. Equality, Diversity and Anti-Discriminatory Practice

4.1 The Trust recognises that safeguarding risks are influenced by inequality, discrimination, and systemic factors.

4.2 The Trust will:

- Actively challenge discrimination and oppressive practice
- Reflect on potential bias in decision-making
- Be mindful of cultural, social, and contextual influences
- Ensure equitable access to safeguarding support

4.3 The Trust recognises that neurodivergent individuals and those with disabilities may be at increased risk of harm and is committed to making reasonable adjustments to ensure accessibility, understanding, and effective safeguarding.

5. Definitions

5.1 **Child:** A person under 18 years of age.

5.2 **Adult at Risk:** An adult aged 18 or over who has care and support needs, is experiencing or at risk of abuse or neglect, and is unable to protect themselves.

5.3 **Abuse:** Includes but is not limited to:

- Physical
- Emotional / Psychological/ Coercive behaviour
- Sexual
- Neglect
- Financial
- Discriminatory
- Domestic abuse
- Organisational abuse
- Modern slavery and trafficking
- Self-neglect
- Online and digital harm
- Radicalisation and extremism
- Female Genital Mutilation (FGM)

5.4 If the counsellor is alerted to any of the above he/she should refer to the safeguarding flowchart and take the appropriate next steps, documenting everything and contacting the Trust's DSL.

7. Responsibilities

6.1 The Trust will:

- Ensure all staff understand safeguarding responsibilities
- Ensure all staff hold an Enhanced DBS check appropriate to their role
- Ensure DBS checks are kept up to date in line with the Trust's policy
- Maintain a safe recruitment process
- Require **annual safeguarding training** for all staff
- Maintain clear reporting and escalation processes
- Work collaboratively with safeguarding partners
- Review safeguarding practice and learning regularly

6.2 Although counsellors are responsible for accessing independent clinical supervision externally, all staff consult with the Trust's Designated Safeguarding Lead for guidance on safeguarding concerns.

6.3 Supervision must not delay immediate safeguarding action or reporting where risk is identified.

7. Safe Recruitment

7.1 The Trust ensures:

- Completion of application forms and interviews
- Two references obtained and verified
- Enhanced DBS checks completed prior to working with clients
- Clear role descriptions and safeguarding expectations
- Induction including safeguarding procedures

8. Online and Digital Safeguarding

8.1 The Trust recognises that safeguarding risks may arise in online and digital contexts, including remote counselling.

8.2 The Trust will:

- Maintain appropriate professional boundaries in digital communication
- Respond to online disclosures in line with safeguarding procedures
- Ensure confidentiality and data security in remote sessions
- Consider risks associated with social media, messaging platforms, and digital access

8.3 Any safeguarding concerns identified in online work will be responded to in the same way as in-person concerns.

8.4 The trust recognises that online counselling may not be appropriate for children.

9. Recognising Abuse

9.1 All staff must remain alert to signs of abuse and neglect, including behavioural, emotional, physical, and relational indicators.

9.2 Staff are expected to maintain professional curiosity, respectfully exploring concerns and not accepting explanations at face value where safeguarding risks may be present.

9.3 All concerns must be taken seriously.

10. Responding to Safeguarding Concerns

10.1 If abuse is suspected or disclosed:

- Listen carefully and take the individual seriously
- Do not promise confidentiality
- Reassure appropriately
- Avoid leading questions
- Record accurately and promptly
- Report immediately to the Designated Safeguarding Lead (DSL) or the Safeguarding Deputy if the DSL is not available.

10.2 In an emergency, staff will contact 999.

10.3 Where a child is suspected to be suffering, or likely to suffer, significant harm, a referral will be made to the relevant Integrated Children's Services in line with Section 47 of the Children Act 1989 and *Working Together to Safeguard Children (2026)*

10.4 Where an adult is suspected of suffering significant harm, impacting their wellbeing a discussion will follow, and an appropriate referral could be made to the relevant agency.

10.5 Please refer to the Trust's safeguarding flow chat for clear steps through the safeguarding process.

11. Early Help and Prevention

11.1 The Trust recognises the importance of early identification and support.

11.2 The Trust will:

- Identify emerging concerns at the earliest opportunity
- Take appropriate action to support early intervention
- Support families where appropriate
- Refer to relevant services to prevent escalation
- Contribute to multi-agency plans where required

12. Multi-Agency Working

12.1 The Trust recognises its role within multi-agency safeguarding arrangements.

12.2 The Trust will:

- Work collaboratively with safeguarding partners including local authority, police, health, and education
- Share information appropriately to protect children and adults at risk
- Contribute to safeguarding assessments and plans where required
- Support coordinated responses in line with Working Together to Safeguard Children (2026)

13. Reporting Procedures

13.1 All concerns must be reported to:

Designated Safeguarding Lead:
Dr Nellie Adjaye
Contact Details: Email: nellieadjaye2@gmail.com **Tel Number:** 07767441188

Deputy Safeguarding Lead:
Mrs Ann Freeman
Contact Details: Email: ann_freeman@hotmail.co.uk **Tel number:** 01622 675714

13.2 Kent Safeguarding Children

- **Link:** Kent Integrated Children's Services
  www.kccchildrens.kent.gov.uk
- **Tel number:** Kent Integrated Children's Services: 03000 41 11 11

14.3 Medway Safeguarding Children

- **Link:** Medway Safeguarding Children Partnership
  www.medwayscp.org.uk
- **Phone:** 01634 334 466 Monday to Friday from 9am to 4pm
- **Phone:** 03000 419 191 Out of hours

14.4 Kent and Medway Safeguarding Adults

- **Link:** Kent and Medway Adult Safeguard Reporting

- **Email**: social.services@kent.gov.uk
- **Phone**: 03000 41 61 61 Monday to Friday, 9am to 4pm
- **Phone**: 03000 41 91 91 (out of hours)
- **Text relay:** 18001 03000 41 61 61.

- For those with a hearing or speech impairment, Relay UK can make communication over the phone easier.

14.4 Domestic Abuse

- **Link:** Kent and Medway Domestic Abuse Partnership https://www.domesticabuseservices.org.uk/
- **Helpline:** 0808 168 9276

14. Confidentiality and Information Sharing

14.1 Confidentiality is fundamental to counselling practice but is not absolute.

14.2 All counselling staff will clearly communicate the limits of confidentiality at the outset of the therapeutic relationship, particularly where there could be a risk of harm.

14.3 Information will be shared where:

- There is risk of significant harm
- A child or adult at risk is in danger
- A crime may have been committed

14.4 Information will be shared appropriately, proportionately, and on a **need-to-know basis**, in line with legislation, statutory guidance, and the BACP Ethical Framework.

14.4 Information sharing will be carried out in accordance with HM Government *Information Sharing Guidance*, including the **seven golden rules of information sharing**. Decisions to share or not share information will be:

- Justified and recorded
- Proportionate to the level of risk
- Made in the best interests of the child or adult at risk

16. Record Keeping

16.1 All safeguarding concerns, disclosures, and decisions must be recorded promptly, clearly, and accurately.

16.2 Records must include:

- Factual information (not opinion unless clearly stated)
- Dates, times, and context of concerns
- Actions taken and rationale for decisions
- Details of any referrals or consultations

16.3 Safeguarding records will be stored securely and separately from clinical notes where appropriate, with access restricted on a need-to-know basis.

16.4 Records will be retained in line with legal requirements, data protection legislation, and BACP guidance.

17. Mental Capacity and Consent

17.1 In line with the Mental Capacity Act 2004:

- Adults are presumed to have capacity unless proven otherwise
- Individuals have the right to make unwise decisions
- Decisions made on behalf of someone lacking capacity must be in their best interests

17.2 For children, Gillick competence will be considered.

18. Allegations Against Staff

18.1 All allegations, concerns, or suspicions that a member of staff has:

- harmed a child or adult at risk
- possibly committed a criminal offence
- behaved in a way that indicates they may pose a risk

must be reported immediately to the Designated Safeguarding Lead (DSL).

18.2 The DSL will:

- Ensure the immediate safety of the individual(s) involved
- Report the concern to the **Local Authority Designated Officer (LADO)** within one working day
- Follow local safeguarding partnership procedures
- Record all information clearly and securely

18.3 If the concern involves the DSL, the report must be made to the Deputy Safeguarding Lead or directly to the LADO.

18.4 No internal investigation will take place prior to consultation with the LADO, unless advised otherwise.

18.4 The Trust will ensure appropriate support for all individuals involved, including the person raising the concern.

19. Whistleblowing

19.1 The Trust is committed to a culture of openness and accountability. All staff have a duty to raise concerns about poor or unsafe safeguarding practice.

19.2 Concerns can be raised internally with the Designated Safeguarding Lead or externally with relevant authorities where necessary.

19.3 Concerns about safeguarding practice will be taken seriously, investigated appropriately, and responded to in line with legal and ethical obligations.

20. Escalation and Professional Disagreement

20.1 If there is disagreement about a safeguarding decision, individuals have a responsibility to escalate concerns.

20.2 This may include:

- Seeking further guidance from the DSL or Deputy DSL
- Consulting with safeguarding partners

- Following local safeguarding partnership escalation procedures

20.3 The safety and wellbeing of the child or adult at risk must always remain the primary consideration.

21. Learning, Quality Assurance and Review

21.1 The Trust is committed to continuous improvement in safeguarding practice.

21.2 The Trust will:

- Review safeguarding incidents and outcomes
- Learn from experience, feedback, and multi-agency processes
- Reflect within supervision and organisational review structures
- Update practice in response to learning

22. Policy Review

22.1 This policy will be reviewed annually or sooner in response to legislative or organisational changes.