



SAFEGUARDING POLICY

Effective date: 20 February 2026

Last updated: 23 July 2026

1. Policy Statement

Athena GESDA Ltd is committed to safeguarding and promoting the welfare, safety and dignity of children, young people and adults who may be at risk.

We recognise that safeguarding is everyone's responsibility.

Athena GESDA will take reasonable and proportionate steps to:

- prevent abuse, exploitation, neglect and avoidable harm;
- create safe environments for participation in our activities;
- identify and respond appropriately to safeguarding concerns;
- ensure that concerns are reported promptly;
- select and manage personnel and Partners responsibly;
- maintain appropriate professional boundaries;
- protect individuals from retaliation after raising concerns;
- cooperate with schools, institutions, statutory agencies and law-enforcement authorities; and
- continually improve our safeguarding arrangements.

The welfare and safety of the child or adult at risk will take priority over:

- commercial interests;
- institutional reputation;
- personal relationships;
- programme delivery;
- confidentiality preferences; and
- concerns about reputational damage.

Athena GESDA will not tolerate abuse, exploitation, harassment, grooming, neglect or inappropriate conduct by anyone working for, representing or participating in its activities.

2. About Athena GESDA

Athena GESDA Ltd is a UK-based international education consultancy.

Our activities may include:

- international student recruitment strategy;
- school and university engagement;
- international education roadshows;
- student recruitment events;
- workshops and presentations for prospective students;
- parent and counsellor engagement;
- university partnership development;
- leadership immersion programmes;
- international delegations;
- training and professional development;
- conferences and networking events;
- counsellor engagement and certification;
- university-industry-government collaboration;
- employability and enterprise programmes;
- international mobility programmes;
- institutional visits;
- digital events and webinars; and
- other education-related consultancy and programme-delivery services.

Some Athena GESDA activities may involve direct or indirect contact with:

- children under the age of 18;
- school pupils;
- prospective university students;
- adults who may have care and support needs;
- disabled participants;
- international travellers;
- individuals experiencing distress or vulnerability; and
- people whose circumstances may increase their risk of harm.

Company name: Athena GESDA Ltd

Website: www.athenagesda.org

Email: info@athenagesda.org

3. Purpose of this Policy

This Policy establishes Athena GESDA's approach to safeguarding.

Its purpose is to:

- define safeguarding responsibilities;
- explain expected standards of conduct;
- establish procedures for reporting and responding to concerns;
- reduce risks associated with student-facing and international activities;
- support safe recruitment and contractor engagement;
- ensure that Partners understand their safeguarding responsibilities;
- establish rules for photography, communication, travel and one-to-one contact;
- provide guidance for responding to disclosures;
- protect children and adults at risk from abuse and exploitation; and
- ensure that safeguarding decisions are documented appropriately.

4. Scope

This Policy applies to:

- directors;
- employees;
- consultants;
- contractors;
- interns;
- volunteers;
- agents;
- representatives;
- speakers;

- trainers;
- mentors;
- event staff;
- photographers;
- local delivery partners;
- travel coordinators;
- suppliers;
- subcontractors; and
- anyone else carrying out work or activities for or on behalf of Athena GESDA.

These individuals are referred to collectively in this Policy as “Athena GESDA Personnel”.

The Policy also sets expectations for:

- Clients;
- Delegates;
- schools;
- universities;
- host institutions;
- parents and guardians;
- participants;
- sponsors;
- venue providers; and
- other Partners involved in Athena GESDA activities.

The Policy applies to conduct:

- in person;
- online;
- through email or messaging platforms;
- during telephone or video calls;

- at schools, universities and venues;
- during business or programme travel;
- in hotels or accommodation;
- during social activities linked to a programme;
- on social media;
- during transport;
- at Athena GESDA or Partner premises; and
- in any other context connected with Athena GESDA.

5. Legal and Guidance Framework

Athena GESDA will have regard, where relevant, to applicable UK legislation and statutory guidance, including:

- Children Act 1989;
- Children Act 2004;
- Children and Social Work Act 2017;
- Working Together to Safeguard Children;
- Keeping Children Safe in Education;
- Education Act 2002;
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Care Act 2014;
- Sexual Offences Act 2003;
- Female Genital Mutilation Act 2003;
- Modern Slavery Act 2015;
- Counter-Terrorism and Security Act 2015;
- Equality Act 2010;
- Human Rights Act 1998;
- Data Protection Act 2018;

- UK General Data Protection Regulation;
- Domestic Abuse Act 2021; and
- relevant Disclosure and Barring Service guidance.

Not every legal duty applying to schools, colleges, local authorities or regulated care providers applies directly to Athena GESDA.

However, Athena GESDA will seek to follow relevant safeguarding principles and will comply with the safeguarding procedures of host schools and institutions when operating on their premises.

Where an activity takes place outside the UK, Athena GESDA will also consider:

- applicable local law;
- local child-protection and adult-protection arrangements;
- the safeguarding policies of host institutions;
- local emergency-reporting mechanisms; and
- internationally recognised safeguarding principles.

Where local practice provides less protection than this Policy, Athena GESDA will seek to apply the higher standard wherever lawful and reasonably practicable.

6. Definitions

6.1. Child

A child is any person who has not yet reached their 18th birthday.

A person's apparent maturity, educational status, employment status or marital status does not change this definition.

6.2. Adult at risk

For the purposes of this Policy, an adult at risk is a person aged 18 or over who:

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

A person may also be temporarily vulnerable because of:

- illness;

- injury;
- disability;
- mental distress;
- intoxication;
- bereavement;
- isolation;
- language barriers;
- unfamiliarity with a country;
- financial dependence;
- coercion;
- travel disruption; or
- another circumstance affecting their ability to protect themselves.

6.3. Safeguarding

Safeguarding means taking reasonable action to:

- promote welfare;
- prevent harm;
- protect people from abuse, exploitation and neglect;
- identify concerns;
- respond appropriately; and
- create safe organisational practices.

6.4. Child protection

Child protection is part of safeguarding and relates specifically to action taken where a child is suffering, or is likely to suffer, significant harm.

6.5. Abuse

Abuse includes conduct that causes, permits, facilitates or risks physical, emotional, sexual, financial or other harm.

Abuse may be:

- deliberate or unintentional;
- a single incident or repeated pattern;
- carried out by an adult or child;
- committed in person or online;
- committed by a stranger or someone known to the individual; and
- connected with an organisation, family, institution or community.

7. Safeguarding Principles

Athena GESDA's safeguarding approach is guided by the following principles:

7.1. Welfare first

The welfare, safety and dignity of the child or adult at risk are the primary consideration.

7.2. Prevention

Activities should be planned to reduce foreseeable safeguarding risks.

7.3. Proportionality

Responses should be appropriate to the seriousness and immediacy of the concern.

7.4. Prompt action

Concerns should be reported without unnecessary delay.

7.5. Partnership

Athena GESDA will work with schools, institutions, parents, guardians, local authorities, police and other appropriate agencies.

7.6. Respect and dignity

People affected by safeguarding concerns must be treated respectfully and without blame.

7.7. Inclusion

Safeguarding arrangements must recognise that some individuals face additional barriers to disclosure or protection.

7.8. Confidentiality with limits

Information will be protected but may be shared where necessary to safeguard a person.

7.9. Accountability

Safeguarding decisions, referrals and actions should be recorded.

7.10. No internal investigation

Athena GESDA Personnel must not attempt to establish criminal guilt or conduct their own detailed investigation before reporting a serious concern.

8. Forms of Abuse and Harm

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

8.1. Physical abuse

Physical abuse may include:

- hitting;
- shaking;
- pushing;
- burning;
- poisoning;
- inappropriate restraint;
- misuse of medication;
- forced physical activity; or
- deliberately causing illness or injury.

8.2. Emotional or psychological abuse

This may include:

- humiliation;
- threats;
- intimidation;
- rejection;
- coercion;
- controlling behaviour;
- isolation;

- persistent criticism;
- exposure to domestic abuse;
- cyberbullying; or
- making someone feel worthless or unsafe.

8.3. Sexual abuse

Sexual abuse includes forcing, pressuring, manipulating or enticing a child or adult into sexual activity.

It may involve:

- physical contact;
- non-contact sexual activity;
- sexualised communication;
- exposure to sexual content;
- grooming;
- sexual exploitation;
- taking or sharing sexual images;
- voyeurism;
- indecent exposure; or
- sexual activity where valid consent is absent.

A child cannot lawfully consent to exploitation or abuse.

8.4. Neglect

Neglect may include persistent failure to meet a person's basic physical or psychological needs.

It may involve failure to provide:

- food;
- clothing;
- shelter;
- medical care;

- supervision;
- protection;
- emotional support; or
- access to appropriate assistance.

8.5. Financial or material abuse

This may include:

- theft;
- fraud;
- misuse of money;
- coercion relating to payment;
- exploitation of financial dependence;
- withholding money or documents;
- improper control of a person's finances; or
- pressure to purchase services.

8.6. Domestic abuse

Domestic abuse may include:

- physical abuse;
- sexual abuse;
- emotional abuse;
- coercive control;
- economic abuse;
- stalking;
- threats; or
- technology-facilitated abuse.

Children who see, hear or experience the effects of domestic abuse may themselves be victims.

8.7. Discriminatory abuse

This includes abuse or harassment based on:

- race;
- nationality;
- ethnicity;
- religion or belief;
- sex;
- sexual orientation;
- gender reassignment;
- disability;
- age; or
- another personal characteristic.

8.8. Organisational abuse

This may include poor, neglectful or abusive practices within an institution, programme, residential setting or organisation.

8.9. Self-neglect

Self-neglect may involve serious neglect of personal hygiene, health, safety or surroundings.

8.10. Modern slavery and trafficking

This may include:

- human trafficking;
- forced labour;
- servitude;
- debt bondage;
- sexual exploitation;
- forced criminality;
- domestic servitude; or

- exploitation through deceptive recruitment.

8.11. Child sexual exploitation

Child sexual exploitation occurs where a person or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.

The child may appear to agree to the activity but cannot consent to exploitation.

8.12. Child criminal exploitation

This may include:

- forcing or manipulating children to transport drugs or money;
- involvement in organised crime;
- forced theft;
- exploitation through gangs;
- coercion to commit fraud; or
- threats used to control a child.

8.13. Harmful sexual behaviour

Children may display sexual behaviour that is inappropriate, problematic or abusive towards other children.

Concerns must not be dismissed as joking, experimentation or normal behaviour without appropriate assessment.

8.14. Female genital mutilation

Female genital mutilation is illegal and is a serious form of child abuse.

Concerns may arise where a child:

- talks about a planned special procedure or ceremony;
- is taken abroad unexpectedly;
- has extended absence from education;
- experiences pain or difficulty after travel; or
- makes a direct disclosure.

8.15. Forced marriage

Forced marriage occurs where one or both people do not freely consent and pressure, coercion or abuse is used.

It is not the same as an arranged marriage in which both parties freely consent.

8.16. So-called honour-based abuse

This may include threats, coercion, forced marriage, violence, imprisonment or murder carried out to protect or defend perceived family or community honour.

8.17. Radicalisation and extremism

Safeguarding concerns may arise where a person is being groomed, influenced or exploited to support terrorism or extremist violence.

Concerns must be handled proportionately and without stereotyping individuals or communities.

8.18. Online abuse

Online harm may include:

- cyberbullying;
- grooming;
- sexual exploitation;
- coercion;
- sharing intimate images;
- blackmail;
- exposure to harmful content;
- impersonation;
- fraud;
- stalking; or
- radicalisation.

9. Factors That May Increase Vulnerability

Any person may experience abuse.

Some children or adults may face additional risks or barriers to obtaining help because of:

- disability;
- communication needs;
- neurodiversity;
- limited English;
- social isolation;
- being away from home;
- dependence on adults or institutions;
- financial hardship;
- immigration status;
- cultural pressure;
- previous trauma;
- family instability;
- being in care;
- homelessness;
- discrimination;
- mental distress;
- pregnancy;
- caring responsibilities;
- sexual orientation or gender identity;
- unfamiliarity with local systems; or
- fear of authorities.

Athena GESDA Personnel must avoid assuming that a person is safe merely because they are:

- academically successful;
- confident;
- accompanied by an adult;
- attending a prestigious institution;

- from an affluent family;
- travelling professionally; or
- unwilling to make a formal complaint.

10. Safeguarding Roles and Responsibilities

10.1. Founder and Chief Executive Officer

The Founder and Chief Executive Officer has overall responsibility for:

- approving this Policy;
- promoting a safeguarding culture;
- ensuring proportionate safeguarding arrangements are in place;
- appointing a Safeguarding Lead;
- considering serious safeguarding concerns;
- allocating appropriate resources;
- ensuring that concerns are referred appropriately;
- overseeing responses to allegations against Personnel;
- ensuring review and learning after incidents; and
- approving safeguarding improvements.

10.2. Designated Safeguarding Lead

Athena GESDA will appoint a Designated Safeguarding Lead (“DSL”).

Designated Safeguarding Lead: Andreea Willmott

Email: andreea.willmott@athenagesda.org

Telephone: +447841642665

The DSL is responsible for:

- receiving safeguarding reports;
- assessing immediate risk;
- maintaining appropriate records;
- seeking specialist advice;
- making or coordinating referrals;
- liaising with schools and institutions;

- communicating with statutory agencies;
- ensuring safeguarding actions are followed through;
- advising Personnel;
- reviewing risk assessments;
- overseeing safeguarding training;
- managing allegations in accordance with this Policy; and
- reporting material safeguarding matters to senior leadership.

10.3. Project and Event Leads

Project and Event Leads must:

- consider safeguarding during planning;
- identify the host institution's safeguarding contact;
- ensure Personnel understand reporting procedures;
- manage attendance and supervision arrangements;
- respond to immediate safety concerns;
- ensure incidents are reported to the DSL;
- maintain emergency contact information where appropriate; and
- cooperate with any subsequent review.

10.4. All Personnel

All Athena GESDA Personnel must:

- read and follow this Policy;
- complete required training;
- maintain professional boundaries;
- remain alert to indicators of harm;
- respond appropriately to disclosures;
- report concerns promptly;
- cooperate with safeguarding enquiries;
- protect confidential information;

- avoid investigating concerns independently; and
- place safety above commercial or reputational considerations.

11. Partnership With Schools and Institutions

When Athena GESDA carries out activities in a school, college or university, the host institution will normally retain primary responsibility for safeguarding its pupils or students on its premises.

Before a student-facing activity, Athena GESDA should establish, where reasonably practicable:

- the name of the institution's safeguarding contact;
- how concerns should be reported;
- who is responsible for supervision;
- whether parental consent is required;
- photography and recording arrangements;
- emergency procedures;
- visitor identification requirements;
- prohibited areas;
- expected conduct; and
- arrangements for one-to-one interaction.

Athena GESDA Personnel must follow the host institution's safeguarding and visitor procedures.

Where Athena GESDA's Policy provides a higher standard, Personnel should follow the higher standard where it does not conflict with local law or the institution's legitimate safeguarding arrangements.

A concern observed on a school visit should normally be reported promptly to:

- the host school's Designated Safeguarding Lead; and
- Athena GESDA's Designated Safeguarding Lead.

Where there is an immediate danger or concern that the institution may be implicated, the concern should be escalated directly to the appropriate emergency or statutory authority.

12. Programme and Event Risk Assessment

Safeguarding must be considered during the planning of activities involving children or adults at risk.

A proportionate risk assessment should consider:

- participant ages;
- number of participants;
- supervision;
- one-to-one contact;
- venue access;
- transport;
- accommodation;
- international travel;
- online communication;
- photography and filming;
- medical and accessibility needs;
- emergency contacts;
- arrival and departure arrangements;
- parental or guardian consent;
- local safeguarding systems;
- cultural and legal context;
- alcohol;
- evening activities;
- external speakers;
- contractors;
- security;
- bathroom and changing arrangements;
- potential isolation of participants; and

- procedures for lost or missing participants.

Risk assessments must be reviewed where circumstances materially change.

13. Supervision and Responsibility for Children

Unless expressly agreed in writing, Athena GESDA does not assume parental responsibility for children attending school-based recruitment activities.

For school visits and roadshows:

- the school should retain responsibility for supervising its pupils;
- Athena GESDA Personnel should not be left solely responsible for a group of children;
- a school employee or authorised adult should normally remain present;
- Athena GESDA Personnel should avoid being alone with a child;
- activities should take place in visible and appropriate spaces; and
- attendance and departure arrangements should be managed by the host institution.

Where Athena GESDA organises a programme involving responsibility for children outside their school environment, specific safeguarding arrangements must be developed, including:

- written parental or guardian consent;
- emergency contacts;
- medical and dietary information;
- supervision ratios;
- travel and accommodation arrangements;
- rooming arrangements;
- curfews;
- missing-person procedures;
- codes of conduct;
- insurance;
- trained safeguarding personnel; and

- local emergency contacts.

A generic Event booking form is not sufficient for residential or international programmes involving unaccompanied children.

14. Safe Recruitment and Engagement

Athena GESDA will apply proportionate safer recruitment procedures to roles involving contact with children or adults at risk.

These may include:

- a clear role description;
- application or professional history;
- identity verification;
- interview or suitability discussion;
- references;
- right-to-work checks;
- qualification checks;
- assessment of gaps in work history;
- safeguarding questions;
- signed declarations;
- contractual safeguarding obligations;
- code-of-conduct acceptance;
- training; and
- appropriate criminal-record checks where legally eligible.

A Disclosure and Barring Service check will be obtained only where the role and activities are legally eligible for the relevant level of check.

Athena GESDA will not assume that every person attending a school or Event is eligible for an Enhanced DBS check.

The required level of check must be assessed by reference to:

- the actual duties;
- frequency of activity;

- level of supervision;
- contact with children or adults;
- whether regulated activity is involved; and
- current DBS eligibility guidance.

A criminal record will not automatically prevent engagement. The relevance, seriousness, age and circumstances of any information will be assessed fairly and lawfully.

No person known to be barred from regulated activity may be permitted to undertake that regulated activity.

15. International Criminal-Record and Suitability Checks

Where Personnel are recruited or based outside the UK, Athena GESDA may consider:

- local criminal-record checks;
- certificates of good conduct;
- identity verification;
- references;
- employment-history checks;
- professional registration;
- sanctions and adverse-media checks;
- safeguarding declarations; and
- additional supervision.

A clear criminal-record check does not by itself establish suitability.

Selection, training, supervision and professional conduct remain essential.

16. Code of Conduct

Athena GESDA Personnel must:

- treat all participants with dignity and respect;
- use appropriate language;
- work in visible and professional environments;
- follow host institution rules;

- maintain appropriate physical and emotional boundaries;
- avoid favouritism;
- avoid unnecessary physical contact;
- respect privacy;
- use approved communication channels;
- report concerns promptly;
- challenge unsafe conduct appropriately;
- avoid humiliating or intimidating behaviour;
- avoid being under the influence of alcohol or illegal drugs while responsible for participants; and
- act in a way that protects both participants and Personnel from misunderstanding or allegation.

Personnel must not:

- engage in sexual activity with a child;
- form an exploitative or inappropriate relationship;
- groom a participant;
- exchange sexual or intimate messages;
- make sexualised comments;
- share pornography or inappropriate content;
- invite a child to private accommodation;
- take a child in a private vehicle without authorised arrangements;
- meet a child privately outside the programme;
- exchange personal gifts inappropriately;
- give personal money or loans;
- ask a child to keep secrets;
- use physical punishment;
- use degrading language;

- photograph or record a participant without appropriate permission;
- share participant details without authority;
- contact a child through personal social-media accounts;
- consume alcohol while directly supervising children; or
- ignore behaviour that may place someone at risk.

17. Professional Boundaries

Athena GESDA Personnel must maintain relationships that are appropriate to their professional role.

Particular caution is required where there is:

- an age difference;
- a power imbalance;
- academic or career influence;
- control over opportunities;
- travel or accommodation dependence;
- financial dependence;
- emotional vulnerability;
- private communication; or
- social contact outside a programme.

A participant reaching the age of 18 does not automatically make a relationship appropriate where:

- grooming began while the person was a child;
- a significant power imbalance remains;
- the individual remains dependent on Athena GESDA Personnel; or
- the relationship creates exploitation or conflict of interest.

18. One-to-One Contact

One-to-one contact with a child should be avoided where possible.

Where it is necessary:

- the host institution should approve the arrangement;
- another responsible adult should know that it is taking place;
- the meeting should occur in a visible or open environment;
- doors should remain open where appropriate;
- the meeting should be time-limited;
- the purpose should be professional;
- personal topics should be avoided unless relevant to a safeguarding disclosure;
and
- a record should be made where the interaction is significant.

Online one-to-one meetings with children should:

- use approved organisational accounts;
- include a teacher, parent, guardian or another approved adult where practicable;
- not be recorded without consent;
- take place at an appropriate time;
- avoid private or disappearing-message platforms; and
- remain focused on the agreed educational purpose.

19. Communication With Children

Communication with children must be:

- necessary;
- professional;
- transparent;
- related to the programme;
- made through approved channels; and
- capable of organisational oversight.

Personnel must not normally:

- add children as personal social-media contacts;

- communicate through personal messaging accounts;
- send disappearing messages;
- send messages late at night without an emergency reason;
- request personal photographs;
- engage in flirtatious or sexual communication;
- share personal intimate information; or
- continue contact after the legitimate programme purpose has ended.

Where direct contact details are collected for event follow-up, Athena GESDA must consider:

- the child's age;
- parental or institutional consent;
- applicable privacy law;
- whether communication should go through the school or parent;
- marketing-consent requirements; and
- safeguarding risks.

For younger students, communication should normally be routed through the school, parent or guardian.

20. Photography, Video and Recording

Images and recordings of children or adults at risk must be managed carefully.

Before taking or publishing identifiable images, Athena GESDA should establish:

- who is responsible for obtaining consent;
- whether parental or guardian consent is required;
- the purpose of the recording;
- where it will be used;
- how long it will be retained;
- whether names will be published; and
- whether any participant must not be photographed.

Athena GESDA Personnel must:

- use approved devices where practicable;
- avoid recording children in inappropriate settings;
- avoid identifying a child by full name unless authorised;
- not publish personal contact or location information;
- not create images that could be humiliating or misused;
- store images securely;
- delete unnecessary copies; and
- respect withdrawal of consent for future use where applicable.

Personal devices should not normally be used to photograph children.

Images must not be shared through personal social-media accounts without explicit authorisation.

21. Online Safety

Online activities must be designed to reduce the risks of:

- grooming;
- cyberbullying;
- inappropriate messaging;
- sexual exploitation;
- exposure to harmful content;
- unauthorised recording;
- sharing personal data;
- impersonation;
- harassment;
- fraud; and
- radicalisation.

Athena GESDA should use, where reasonably practicable:

- secure meeting platforms;

- password-protected sessions;
- controlled participant access;
- waiting rooms;
- moderated chat;
- appropriate privacy settings;
- organisational accounts;
- clear online conduct rules; and
- procedures for removing disruptive participants.

Personnel must not record an online session involving children without appropriate authority and consent.

Private chat functions should be disabled or monitored where appropriate.

22. Travel, Transport and Accommodation

Activities involving travel or overnight accommodation require enhanced safeguarding planning.

Arrangements should consider:

- participant ages;
- parental or guardian consent;
- passports and visas;
- emergency contacts;
- medical needs;
- insurance;
- transport safety;
- supervision;
- room allocation;
- gender and privacy;
- accessibility;
- curfews;

- alcohol;
- lost participants;
- local laws;
- emergency medical treatment;
- safe return arrangements;
- host-family arrangements, if any; and
- conduct outside formal programme hours.

Personnel must not normally:

- share a bedroom with a child;
- invite a child into their private hotel room;
- transport a child alone without authorised arrangements;
- leave a child unsupervised where responsibility has been accepted;
- consume alcohol while responsible for children; or
- change travel or accommodation arrangements without notifying the programme lead.

Where a child becomes separated from the group, the missing-person procedure must be activated immediately.

23. Alcohol, Drugs and Social Events

Athena GESDA will take particular care at receptions, dinners and social events.

Where children attend:

- alcohol must not be supplied to them contrary to law;
- adults responsible for supervision must remain fit to carry out their responsibilities;
- children must not be taken to inappropriate venues;
- departure arrangements must be clear; and
- unsupervised contact with unfamiliar adults should be minimised.

Illegal drugs are prohibited at Athena GESDA activities.

Where an adult participant appears incapable of protecting themselves because of intoxication, Personnel should take proportionate action to support their immediate safety.

24. Responding to a Disclosure

Where a child or adult discloses abuse or harm, the person receiving the disclosure must:

- remain calm;
- listen carefully;
- take the disclosure seriously;
- allow the person to speak in their own words;
- avoid expressing shock or disbelief;
- reassure them that they were right to speak;
- explain that the information may need to be shared to keep them or someone else safe;
- ask only limited, open questions needed to clarify immediate safety;
- avoid leading questions;
- avoid promising secrecy;
- avoid confronting the alleged person;
- make an accurate written record; and
- report the matter promptly.

Appropriate phrases may include:

- “Thank you for telling me.”
- “I am taking what you have said seriously.”
- “This is not your fault.”
- “I may need to tell someone whose job is to help keep you safe.”
- “Is anyone in immediate danger?”

Personnel must not ask the person to repeat their account unnecessarily.

25. Recording a Safeguarding Concern

A safeguarding record should include:

- the date and time of the concern or disclosure;
- the date and time of the record;
- the name and role of the person making the record;
- the identity of the person affected;
- the location;
- what was seen, heard or disclosed;
- the person's own words where possible;
- any visible injuries or immediate risks;
- names of witnesses;
- actions taken;
- who was informed;
- decisions and reasons; and
- any follow-up required.

Records must:

- be factual;
- distinguish fact from opinion;
- avoid speculation;
- be signed or attributable;
- be stored securely;
- be shared only as necessary; and
- not be kept in informal personal notes once transferred to the safeguarding record.

Personnel should not take photographs of injuries unless instructed by an appropriate safeguarding or statutory professional.

26. Reporting Procedures

26.1. Immediate danger

Where a child or adult is in immediate danger or requires urgent medical assistance:

1. Contact the relevant emergency service immediately.
2. Take reasonable action to protect the person without placing yourself or others at unnecessary risk.
3. Inform the host institution's safeguarding lead where applicable.
4. Inform Athena GESDA's DSL as soon as safely possible.
5. Make a factual written record.

In the UK, emergency services should be contacted by calling 999 or 112.

Outside the UK, the Event Lead must identify the relevant local emergency number before the activity begins.

26.2. Concern arising at a school or college

Where a concern arises on school or college premises:

1. Report it immediately to the institution's Designated Safeguarding Lead or authorised safeguarding contact.
2. Report it to Athena GESDA's DSL.
3. Follow the institution's safeguarding procedure.
4. Contact emergency services directly where there is immediate danger.
5. Escalate independently if there is concern that the institution is implicated or is failing to act.

26.3. Concern outside an institution

Where no host safeguarding procedure applies:

1. Report the concern immediately to Athena GESDA's DSL.
2. The DSL will assess immediate safety and seek appropriate advice.
3. A referral may be made to children's social care, adult social care, police or another appropriate authority.
4. The concern and decisions must be recorded.

26.4. Concern outside the UK

The DSL and Event Lead should consider:

- immediate safety;
- local emergency services;
- local child-protection or adult-protection authority;
- the host institution;
- the British embassy, high commission or consulate where relevant;
- the participant's parent or guardian where appropriate;
- insurers or assistance providers;
- UK law where it may apply extraterritorially; and
- specialist legal or safeguarding advice.

Local authorities must not be contacted in a way that creates a greater risk to the affected person without considering the context and seeking advice where possible.

27. Consent and Information Sharing

Safeguarding information will be handled confidentially but confidentiality is not absolute.

Information may be shared without consent where necessary and lawful to:

- protect a child or adult from serious harm;
- protect another person;
- report a crime;
- comply with a legal obligation;
- make a safeguarding referral; or
- cooperate with an appropriate authority.

Where safe and appropriate, the individual should be informed:

- what information will be shared;
- with whom;
- why; and

- what may happen next.

Consent should normally be considered when responding to concerns involving an adult with capacity.

However, information may need to be shared without the adult's consent where:

- another person is at risk;
- a child may be affected;
- serious crime is involved;
- the person may be under coercion;
- the person lacks capacity regarding the decision;
- staff or the public are at risk;
- a legal duty applies; or
- the public interest in preventing serious harm outweighs confidentiality.

A refusal of consent must not prevent action required to protect a child.

28. Parental and Guardian Involvement

Parents or guardians should normally be informed about concerns relating to their child where this is safe and appropriate.

They should not be informed before seeking safeguarding advice where doing so may:

- increase risk to the child;
- compromise a police or social-care investigation;
- lead to destruction of evidence;
- result in the child being removed or taken abroad;
- place another person at risk;
- involve suspected abuse by the parent or guardian; or
- otherwise undermine protection.

The decision and reasons should be recorded.

29. Allegations Against Athena GESDA Personnel

Any allegation that a member of Personnel has:

- harmed a child or adult at risk;
- possibly committed a criminal offence;
- behaved in a way indicating they may present a risk;
- breached professional boundaries;
- engaged in grooming;
- formed an inappropriate relationship; or
- behaved in a way that may make them unsuitable to work with children

must be reported immediately to the DSL / Founder or Chief Executive Officer.

Where the allegation concerns the Founder, Chief Executive Officer / DSL, it must be reported to the independent safeguarding contact.

Athena GESDA will:

- prioritise immediate safety;
- avoid investigating beyond what is necessary to establish the basic nature of the concern;
- preserve evidence;
- seek advice from the appropriate statutory authority;
- consider suspension or temporary reassignment;
- notify the person's employer or contracting organisation where appropriate;
- cooperate with police or safeguarding investigations;
- consider referral to the Disclosure and Barring Service where legally required; and
- maintain appropriate confidentiality.

Suspension is a neutral precaution and does not amount to a finding of wrongdoing.

30. Low-Level Concerns

A low-level concern is behaviour that may be inconsistent with expected professional standards but does not initially appear to meet the threshold for referral to statutory authorities.

Examples may include:

- unnecessary one-to-one contact;
- inappropriate familiarity;
- use of personal messaging;
- favouritism;
- taking photographs without permission;
- sharing personal information;
- minor boundary breaches;
- insensitive language; or
- conduct that causes discomfort.

Low-level concerns must still be reported to the DSL.

They may reveal:

- a pattern of concerning behaviour;
- a training need;
- unclear procedures;
- poor judgement; or
- a more serious safeguarding risk.

Reports should be recorded and reviewed proportionately.

31. Concerns About Partners, Clients or Institutions

Where a concern relates to an employee, contractor or representative of a Client, school, university, supplier or Partner, Athena GESDA may:

- report the concern to the organisation's safeguarding lead;
- request immediate protective action;
- suspend the individual's participation;

- contact statutory authorities;
- terminate or suspend the relationship;
- require an investigation or corrective action; or
- prevent further involvement in Athena GESDA activities.

Commercial sensitivity must not delay a safeguarding response.

32. Whistleblowing and Escalation

Personnel should raise concerns where:

- safeguarding procedures are not followed;
- a report has been ignored;
- records have been altered or concealed;
- commercial pressure is preventing action;
- a senior person is implicated;
- retaliation has occurred; or
- an institution appears unwilling or unable to protect an individual.

Concerns may be escalated to:

- the independent safeguarding contact;
- children's social care;
- adult social care;
- police;
- the Disclosure and Barring Service;
- an appropriate regulator;
- the Charity Commission where applicable to a Partner;
- a professional body; or
- another competent authority.

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

33. Protection From Retaliation

Athena GESDA prohibits retaliation against anyone who:

- reports a concern;
- makes a disclosure;
- supports another person;
- provides evidence;
- refuses to participate in unsafe conduct;
- challenges poor practice; or
- cooperates with an investigation.

Retaliation may result in disciplinary, contractual or other action.

A report made honestly will not be treated as misconduct merely because it is not substantiated.

Deliberately false or malicious allegations may be addressed separately.

34. Safeguarding Adults

Responses involving adults should be guided by:

- empowerment;
- prevention;
- proportionality;
- protection;
- partnership; and
- accountability.

Where possible, an adult should be involved in decisions affecting them.

Athena GESDA should consider:

- the adult's wishes;
- immediate danger;
- mental capacity;
- coercion;

- the risk to others;
- whether children are involved;
- criminal conduct;
- the need for advocacy;
- cultural or communication barriers; and
- the least restrictive safe response.

Personnel must not assume that a disability or mental-health condition means a person lacks capacity.

Capacity is decision-specific and time-specific.

Where capacity is uncertain, specialist advice should be sought.

35. Medical Emergencies and Mental Distress

Athena GESDA Personnel are not expected to diagnose or provide specialist treatment.

Where a person appears to require urgent medical or mental-health assistance:

- contact emergency or medical services;
- remain with the person where safe;
- involve an appropriate responsible adult;
- protect privacy;
- remove immediate hazards where possible;
- inform the programme lead and DSL; and
- make a factual record.

Statements or behaviour indicating an immediate risk of suicide or serious self-harm must be treated as an emergency.

Do not leave the person alone where there is an immediate and credible risk, unless remaining would create danger.

36. Missing Child or Participant

Where a child or vulnerable participant cannot be located:

1. Confirm when and where the person was last seen.
2. Notify the Event Lead and host institution immediately.

3. Check agreed locations without causing unsafe delay.
4. Contact the parent or guardian where appropriate.
5. Contact police or local emergency services promptly where risk is present.
6. Preserve relevant information, including phone and travel details.
7. Inform Athena GESDA's DSL.
8. Record actions and times.
9. Continue cooperating with authorities until responsibility is formally transferred.

Searches must not expose other participants or Personnel to unreasonable risk.

37. Safeguarding Records and Retention

Safeguarding records must be:

- accurate;
- chronological;
- confidential;
- securely stored;
- protected from unauthorised alteration;
- accessible only to those who need them; and
- retained in accordance with legal, insurance and safeguarding requirements.

Safeguarding records should normally be kept separately from routine project or marketing records.

The retention period will depend on:

- the nature of the concern;
- the age of the person;
- statutory guidance;
- limitation periods;
- contractual requirements;
- DBS referral considerations;
- insurance requirements; and

- advice from safeguarding or legal professionals.

Athena GESDA should adopt a separate safeguarding retention schedule before it begins regularly supervising children or operating residential programmes.

Records must not be destroyed while:

- an investigation is active;
- legal proceedings are possible;
- an authority has requested preservation; or
- an unresolved safeguarding risk remains.

38. Data Protection

Personal data relating to safeguarding may include highly sensitive information.

Athena GESDA will process such information in accordance with:

- UK data-protection law;
- its Privacy Policy;
- applicable information-sharing duties; and
- the need to protect individuals from harm.

Access will be restricted to authorised persons.

Safeguarding information must not be:

- stored in personal email accounts unnecessarily;
- shared in group messaging channels;
- discussed casually;
- used for marketing;
- disclosed to uninvolved persons; or
- transferred internationally without appropriate safeguards and justification.

Data protection law must not be misused as a reason to avoid necessary safeguarding information sharing.

39. Training

Athena GESDA will provide safeguarding information or training proportionate to each role.

Training may include:

- recognising abuse and exploitation;
- responding to disclosures;
- reporting procedures;
- professional boundaries;
- online safety;
- one-to-one contact;
- photography;
- international travel;
- information sharing;
- allegations against Personnel;
- adult safeguarding;
- missing-person procedures; and
- local arrangements for international programmes.

The DSL should undertake suitable safeguarding-lead training and maintain current knowledge.

Personnel with regular or significant contact with children or adults at risk should receive more detailed training than Personnel in low-contact roles.

Training should be refreshed periodically and when:

- legal guidance changes;
- new risks emerge;
- Athena GESDA expands its activities;
- a serious incident occurs; or
- monitoring identifies a need.

40. Contractors, Speakers and Event Personnel

Before participating in relevant activities, contractors, speakers and temporary Event personnel may be required to:

- read this Policy;
- accept the Code of Conduct;
- disclose relevant concerns or conflicts;
- complete safeguarding training;
- provide references;
- undergo eligible checks;
- follow host institution procedures; and
- agree to Athena GESDA's reporting requirements.

A short-term or unpaid role does not remove safeguarding responsibilities.

A well-known professional status or senior institutional position must not be treated as a substitute for appropriate safeguarding controls.

41. Supplier and Partner Requirements

Athena GESDA expects relevant Partners to:

- comply with applicable safeguarding law;
- maintain appropriate policies;
- appoint safeguarding contacts;
- select Personnel responsibly;
- report serious concerns promptly;
- maintain professional boundaries;
- cooperate with investigations;
- protect whistleblowers;
- manage data securely; and
- apply safeguarding expectations to subcontractors.

Before appointing a Partner for a higher-risk activity, Athena GESDA may review:

- safeguarding policies;
- safer recruitment procedures;
- staff training;
- incident-reporting arrangements;
- insurance;
- criminal-record checking processes;
- codes of conduct;
- local safeguarding contacts; and
- previous safeguarding concerns.

A contractual safeguarding clause should be included in material programme and delivery agreements.

42. Breaches of this Policy

A breach may result in:

- guidance or retraining;
- increased supervision;
- removal from an activity;
- suspension;
- termination of employment or engagement;
- termination of a supplier or Partner agreement;
- exclusion from future programmes;
- reporting to an employer or institution;
- referral to the Disclosure and Barring Service;
- referral to police or social care; or
- other legal or regulatory action.

The response will take account of:

- the seriousness of the conduct;
- immediate and future risk;

- whether the behaviour was deliberate;
- any pattern of concerns;
- the person's role;
- statutory advice; and
- the need to protect affected individuals.

43. Monitoring and Review

Athena GESDA will monitor the effectiveness of this Policy proportionately.

Monitoring may include:

- reviewing safeguarding reports;
- reviewing low-level concerns;
- assessing Event risk assessments;
- checking training completion;
- reviewing Partner due diligence;
- evaluating student and participant feedback;
- reviewing allegations and responses;
- considering changes in law and guidance;
- auditing records; and
- identifying themes or repeated risks.

After a serious incident, Athena GESDA should consider:

- what happened;
- whether procedures were followed;
- whether harm could have been prevented;
- whether risk assessments were adequate;
- whether training or supervision should change;
- whether Partner arrangements remain suitable; and
- what learning should be implemented.

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

- statutory guidance changes;
- Athena GESDA begins a new type of programme;
- activities involve greater responsibility for children;
- the business enters a new country;
- a serious safeguarding concern arises;
- monitoring identifies a weakness; or
- organisational arrangements change.

44. Key Safeguarding Contacts

Athena GESDA Designated Safeguarding Lead

Name: Andreea Willmott

Position: Founder & CEO

Email: andreea.willmott@athenagesda.org

Telephone: +447841642665

Email: info@athenagesda.org

Website: www.athenagesda.org

Emergency Services

United Kingdom: 999 or 112

Local Authority Contacts

The relevant children's social-care or adult-safeguarding contact should be identified according to:

- the person's location;
- the location of the incident; and
- the applicable statutory arrangements.

The contact details must be added to each programme or Event safeguarding plan rather than relying on this general Policy alone.

45. Approval

This Policy has been approved by the leadership of Athena GESDA Ltd.

Name: Andreea Willmott

Position: Founder and Chief Executive Officer

For and on behalf of: Athena GESDA Ltd

Document Control

Document title: Safeguarding Policy

Document owner: Athena GESDA Ltd

Approved by: Founder and Chief Executive Officer

Review frequency: At least annually

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