



# **SAFEGUARDING POLICY & PROTOCOLS**

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# SECTION A: Introduction

## A1 Policy Statement and Principles

In accordance with the House of Bishops' Policy Statements 'Promoting a Safer Church' (2017) and 'Protecting All God's Children' (2010) and the Diocesan Safeguarding Policy 'Promoting a Safer Diocese' (2018) our church is committed to:

- Promoting a safer environment and culture.
- Safely recruiting and supporting all those with any responsibility related to children, young people and vulnerable adults within the church.
- Responding promptly to every safeguarding concern or allegation.
- Caring pastorally for victims/survivors of abuse and other affected persons.
- Caring pastorally for those who are the subject of concerns or allegations of abuse and other affected persons.
- Responding to those that may pose a present risk to others.

The Parish will:

- Create a safe and caring place for all.
- Have a named Church Safeguarding Officer (CSO) to work with the incumbent and the PCC to implement policy and procedures.
- Safely recruit, train and support all those with any responsibility for children, young people and adults to have the confidence and skills to recognise and respond to abuse.
- Ensure that there is appropriate insurance cover for all activities involving children and adults undertaken in the name of the parish.
- Display in church premises and on the Parish website the details of who to contact if there are safeguarding concerns or support needs.
- Listen to and take seriously all those who disclose abuse.
- Take steps to protect children and adults when a safeguarding concern of any kind arises, following House of Bishops guidance, including notifying the Diocesan Safeguarding Adviser (DSA) and statutory agencies immediately.
- Offer support to victims/survivors of abuse regardless of the type of abuse, when or where it occurred.
- Care for and monitor any member of the church community who may pose a risk to children and adults whilst maintaining appropriate confidentiality and the safety of all parties.
- Ensure that health and safety policy, procedures and risk assessments are in place and that these are reviewed annually.
- Review the implementation of the Safeguarding Policy, Procedures and Practices at least annually.

Each person who works within this church community will agree to abide by this policy and the guidelines established by this church.

## A2 Key safeguarding roles

### 1. PCC

The PCC has overall responsibility for Safeguarding within Christ Church Cockfosters. This policy is maintained, reviewed, and sanctioned by the PCC.

### 2. Church Safeguarding Officer (CSO)

The CSO is responsible for ensuring that the safeguarding policy is shared, adhered to, reviewed and updated.

The CSO is responsible to the PCC and the Vicar.

The CSO will also be included in decisions about whether to permit someone to be involved in ministry with children where their DBS check is blemished or information is provided about them under the DBS scheme.

### 3. Ministry Area Leaders

The Ministry Area Leaders are responsible for ensuring all volunteers within their area are recruited in accordance with this safeguarding policy. They are also responsible for communicating appropriately with the CSO in regard to any disclosures of abuse within their ministry area.

### 4. Volunteers

To be theologically accurate, the language of “volunteering to help in Church” is not completely appropriate. As a member of Christ Church Cockfosters we are “part of the body” (1 Cor 12) and so serving in various roles is a simply natural thing for a member of the church.

For both the sake of brevity and to match the language used by the Church of England and the Diocese of London, the word “volunteer” shall be used throughout this document.

Volunteer refers to anyone serving in any role within church which involves any oversight of children, young people or vulnerable adults. All volunteers share a responsibility for:

- Loving the person as Christ loves them
- Setting an example of proper Christian conduct
- Praying for those in their care and pointing them to God’s Word

Every applicant who wishes to serve in any ministry area involving children or young people must go through our safer recruitment process (outlined below)

The majority of volunteers will be unpaid, however this document is also a required to be followed by all those who have paid roles on the staff team at Christ Church Cockfosters also.

### 5. Children and vulnerable persons’ champion

The children and vulnerable persons’ champion raises the profile of children / vulnerable people within the church and on the PCC.

## A3 Contact names and details

### **Vicar**

Jon Tuckwell - [jon.t@cockfosters.church](mailto:jon.t@cockfosters.church) - 020 313 757 14

### **Church Safeguarding Officer (CSO)**

Tom Inman - [safeguarding@cockfosters.church](mailto:safeguarding@cockfosters.church) - 020 313 757 11

### **Diocesan Safeguarding Team**

[safeguarding@london.anglican.org](mailto:safeguarding@london.anglican.org) - 020 7932 1224

### **Children and Vulnerable persons' champion**

Beccy Ratcliff - [beccy.r@cockfosters.church](mailto:beccy.r@cockfosters.church)

### **Barnet MASH (Multi Agency Safeguarding Hub)**

020 8359 4066

### **Enfield MASH (Multi Agency Safeguarding Hub)**

020 8379 5555

## National Contacts

**Call 999** if the child/vulnerable person is in immediate danger

### **Thirtynine:Eight**

0303 003 11 11 (with 24 hour helpline)

<https://thirtynineeight.org/>

### **Child Line**

Freepost 1111, London N1 0BR

Tel. 0800 1111 (full number is just these 8 digits)

### **NSPCC**

Child Protection Helpline, 0808 800 5000

### **Family Lives**

(previously Parentline) 0808 800 222

### **Domestic Violence Helpline** (for females)

0808 2000 247

### **Womens Aid** (Barnet)

0203 874 5003

<http://solacewomensaid.org>

### **Men's Advice line**

0808 801 0327

<https://mensadviceline.org.uk>

# SECTION B: Safer working

## B1 The Code of Safer Working Practice

The Code of Safer Working Practice expresses our commitment to demonstrating God's love by placing the highest priority on the safety of those to whom we minister. It sets out what we expect from anyone who ministers in our church, in both paid or voluntary roles, and is one of the ways we ensure high standards of safeguarding in all we do.

### Upholding the code

All members of staff and volunteers are expected to report any breaches of this code to the Church Safeguarding Officer (CSO). Staff and volunteers who breach this code may be subject to disciplinary procedures or asked to leave their role. Serious breaches may also result in a referral made to the relevant statutory agency.

All those working on behalf of the parish with children, young people and adults must:

- Treat all individuals with respect and dignity.
- Respect people's rights to personal privacy.
- Ensure that their own language, tone of voice and body language are respectful.
- Ensure that children, young people and adults know who they can talk to about a personal concern.
- Record and report any concerns about a child, young person or adult and/or the behaviour of another worker to their activity leader and/or the CSO. All written records should be signed and dated.
- Obtain written consent for any photographs or videos to be taken, shown, displayed or stored.
- Always aim to work with or within sight of another adult.
- Ensure another adult is informed if a child needs to be taken to the toilet.
- Respond warmly to a child who needs comforting but make sure there are other adults around.
- Ensure that the child and parents are aware of any activity that requires physical contact and of its nature before the activity takes place.

Those working with children and young people must NOT:

- Use any form of physical punishment.
- Be sexually suggestive about or to an individual.
- Scapegoat, ridicule or reject an individual or group.
- Permit abusive peer activities, for example initiation ceremonies, ridiculing or bullying.
- Show favouritism to any one individual or group.
- Allow an individual to involve them in excessive attention-seeking.
- Allow unknown adults access to children, young people and adults who may be vulnerable. Visitors should always be accompanied by an approved person.
- Allow strangers to give lifts to children, young people and adults who may be vulnerable in the group.
- Befriend children, young people and adults who may be vulnerable on social media.
- Take photographs on personal phones or cameras as this means that images are stored on personal devices.

In addition, for children and young people, you must not:

- Give lifts to children you are supervising, on their own or your own (unless there are exceptional circumstances, for example in an emergency for medical reasons or where parents fail to collect a child and no other arrangements can be made to take a child home. In such situations, the circumstances and your decision must be recorded and shared with an appropriate person at the earliest opportunity)
- Smoke or drink alcohol in the presence of children and young people.
- Arrange social occasions with children and young people (other than events which also include family members/carers) outside organised group occasions.

## **B2 Acceptable touch**

Churches aim to provide a warm, nurturing environment for children and adults who may be vulnerable. We can all find physical contact potentially difficult, and we each have different boundaries of personal space, which may depend on our background, personality, experiences and cultural or ethnic norms.

Sympathetic attention, humour, encouragement and appropriate physical contact are needed by children, young people and adults who may be vulnerable as part of their expression and understanding of human relationships.

See section B2 for what counts as acceptable touch.

### **Restraint**

Restraint is where a child or adult is being held, moved or prevented from moving against their will, because not to do so would result in injury to themselves or others, or would cause significant damage to property.

- Restraint must always be used as a last resort, when all other methods of controlling a situation have been tried and failed.
- Restraint should never be used as a punishment or to bring about compliance (except where there is a risk of injury).
- In all cases where restraint is employed, the incident and subsequent actions should be documented and reported, and this should include written and signed accounts of all those involved, including where possible the child, young person or adult. The parents or carers should be informed the same day.

### **Children or adults in distress**

There will be occasions when a distressed child or adult needs comfort and reassurance, and this may involve physical contact. Young children, in particular, may need immediate physical comfort, for instance after a fall, or separation from a parent. Leaders should use their judgement to comfort or reassure a child in an age-appropriate way while maintaining clear boundaries.

### **Intimate and personal care**

It may sometimes be necessary for leaders to do things of a personal nature for children or adults, particularly if they are very young, disabled or elderly. These tasks should only be carried out with the full understanding and consent of the parents or carers or vulnerable adult, and every effort should be made to ensure that the child or adult who may be vulnerable also understands and gives informed consent, taking account of their disability or impairment.

As a general principle, however, adults should avoid any physical contact when children or adults who may be vulnerable are in a state of undress, avoid any visually intrusive behaviour and, where there are changing rooms, announce their intention of entering.

Generally, leaders should not change in the same place as children, shower or bathe with children, or assist with any personal care task which the child or adult who may be vulnerable can undertake by themselves or for which the adult would usually have a personal carer.

### **Relationships of trust**

Genuine relationships may occur between adults, one of whom is in a caring role with another who is more vulnerable. No intimate relationship should begin while the member of staff or voluntary worker is in a position of trust in relation to them.

The power and influence that a person in a position of trust has over someone attending a group or activity or in a counselling situation cannot be underestimated; such an abuse of trust with a person under 18 years old may be a criminal offence. Church officers must be aware of the power inequalities which exist within relationships in a church setting and the need to behave at all times in a manner which does not exploit these.

## **B3 Activities with children and young people**

The following guidelines should be read in conjunction with The Code of Safer Working Practice:

- These recommendations apply to all the churches activities with children or young people – for instance, Sunday School, crèches, holiday clubs, youth clubs.
- They apply as much to Sunday morning 'in-house' activities as to activities which are run in and for the local community.
- They are designed to protect the children in a church's care, as well as its leaders.
- It is recommended that for all new and existing parish activities where children and adults who may be vulnerable may be included – both one-off and regular – a risk assessment is carried out before it starts or happens, and then reviewed at regular intervals.

### **Leadership**

- Always have at least two leaders, no matter how small the group. See Staffing levels, below. Small groups with single leaders may meet in adjoining rooms with an open door between. If a child or young person is being interviewed alone, have another adult nearby.
- Try to ensure the leaders' genders reflect the group. In other words, endeavour to have at least one male leader if there are boys present, and at least one female leader if there are girls present.
- At least two leaders (preferably unrelated) need to be present from before the first child arrives until after the last child leaves.
- No person under the age of 18 should be left in charge of a group of children of any age.
- Young people aged 16 and 17 may help with groups but should be supervised by an adult leader, who is responsible for ensuring that good practice and the 'safeguarding children' procedures are followed.



- Recruit all regular leaders of activities with children according to this manual's safer recruitment procedures including taking up references and obtaining a Disclosure and Barring Service (DBS) enhanced disclosure. Safeguarding training and support in their role should be offered, including a discussion of the Code of Safer Working Practice.
- Parents or carers who are not regular leaders in the church can assist with occasional activities for a one-off time, such as holiday workshops/events, but should always work in the company of safely recruited leaders and be responsible to an appointed leader.
- Ensure that all leaders are aware of the health and safety issues relating to the activity, including procedures for fire and first aid.
- Give leaders and helpers a copy of the relevant sections of the safeguarding children policy and procedures and offer them support and training in their role. This should include discussion of the Code of Safer Working Practice.
- Avoid lone working. Those working or volunteering with children on behalf of the church should avoid situations where they are on their own with a child.
- Observe an appropriate age gap – a five-year age gap between children and those working with them is advisable.

### **Staffing levels**

These are the minimum required staffing levels for children's groups and are based on NSPCC and Ofsted guidance. More staff may be required if children are being taken out or undertaking physical activities and may also vary depending on:

- The nature and duration of activities
- The competence and experience of staff involved.
- The requirements of location.
- Any additional needs or disabilities.
- The specialist equipment needed.

When young people are helping to supervise younger children, generally only people aged 18 or over should be included as adults when calculating adult-to-child ratios. For every age group, always have a minimum of two leaders.

The minimum staffing levels for groups of children must be as follows:

0 - 2 years	1 adult for every 3 children (1:3)
2 - 3 years	1 adult for every 4 children (1:4)
4 - 8 years	1 adult for every 6 children (1:6)
9 - 12 years	1 adult to 8 children (1:8)
13 - 18 years	1 adult to 10 children (1:10)

### **Administration for activities**

- The CSO must make and update annually a list of all paid staff and voluntary workers in the church who have regular, direct contact with children, and ensure that full recruitment procedures have been followed for each of them.
- Leaders must register every child or young person attending each specific activity with a form which includes their name, address, date of birth, contact number for their parent or carer and consent to the activity. Store the forms together in a

confidential place, and always have them available for leaders of the activity throughout each session.

- Leaders must keep an attendance register for each activity of every child and leader in attendance at each session.
- A phone should always be available throughout each activity for emergencies; this may be a mobile phone.
- Record all accidents in the Accident Book, which should always be accessible on the premises.

### **Running of activities**

- Ensure that children and young people are in the sight of an adult leader at all times.
- Check areas of the building out of sight, for example toilets, regularly during sessions.
- As a general principle, parents or carers of children under 11 are responsible for taking their children to, and collecting them from, an activity for which they have registered.
- Parents or carers must be clearly informed of the place and time of meeting and, if the meeting is off-site, when children will return.
- For children over 11, it is the parents' or carers' responsibility to make arrangements with their child for collection or travelling home independently.
- If a leader has concerns about the collection arrangements for a child over 11, they should address these directly with the parents or carers.
- In the event of a child not being collected as arranged, the parent or carer should be contacted by phone and asked to collect the child. If contact with the parent is not possible, two leaders should wait with the child until contact with the parent or carer has been established. Only in exceptional circumstances should the child be escorted home. If a child appears to have been abandoned, statutory services must be contacted in consultation with the Diocesan Safeguarding Team (DST)
- Be clear about what behaviour is, and is not, acceptable from children and young people.
- Be clear with parents and carers when there is an expectation that they remain responsible for the care and supervision of children during activities and restate this expectation on a regular basis.

### **Programme of activities**

- Ensure that the activities are appropriate and safe for the age range.
- Enable children to be consulted in the programme planning if possible.
- Consider setting ground rules agreed by the group for participating in activities.
- Films shown in a group activity must not be rated higher than the age of the youngest child in the group (for example, 12A only to children aged 12 or over).

### **Taking children off the premises**

- If children are to be taken off church premises for any reason, written permission should be obtained from parents or carer. This permission may be granted for a given period of time, for example, a term.

- A named person at 'home base' for each activity should hold the registration details for all children, young people and leaders who are away from church premises and be available by phone throughout the period of absence in case of emergencies. This person should have the itinerary and be aware of the plans, including estimated time of arrival at the destination, and estimated time of return.
- Leaders of the group should carry with them the registration and consent forms for all children in the group.
- Leaders should each carry mobile phones and have readily accessible on their phone the contact details of other leaders of the group, and the named person at 'home base'.
- A first aid kit should be carried.
- Parents should be informed if their children are to be transported by car or in another vehicle.
- If youth leaders arrange to meet young people in coffee shops and so on, a record should be kept of when the event occurred and in what circumstances.
- For residential trips, see *Holidays and residential trips*.

### **Publicising activities**

- Keep parents, children and young people fully informed in writing of the programme of activities, including the venue, times and contact details for leaders, and make them aware of the ground rules for belonging.
- Advertise the parish Safeguarding Policy and Procedures in summary on the church premises and have them available for parents or carers on request.
- Publicise the name and contact details of the CSO (this can be through a central contact point), with a clear process for how concerns should be raised.

### **Unaccompanied children**

Children may begin attending church services or church activities unaccompanied with or without their parents' or carers' knowledge. The following procedure is recommended.

- Welcome the child(ren) and try to establish whether their parents are aware of where they are.
- Try to discover when they are due home and encourage them to keep to that arrangement.
- Depending on the age and competence of the child, ring the parents or ask the young person to ring to gain the parents' consent to the child remaining.
- Complete a registration form as far as possible.
- Make sure an adult recruited for work with children takes care of the child — this is particularly important during public worship where unknown adults may attend and attempt to befriend the child.
- Give the child written information about the church service or activity to take home, including contact details.
- If the child comes regularly, endeavour to establish contact with the parents or carers.
- Never take the child on outings or transport them without their parents' or carers' permission.

## **Use of home venues**

It is advisable for activities for children and young people to take place on church premises. In the event of leaders using their own homes for church activities, any activity which includes children under 18 years old when their parents are not present is subject to the parish's Safeguarding Policy.

- Rooms should be checked for physical hazards and be hygienic.
- Bedrooms should not be used in any circumstances.
- Two adults (preferably unrelated) should always be present from before the first child arrives until after the last one leaves.
- Parents will be aware, in writing, of any use of home as venue.
- Leaders must have a DBS home check in order to host events in their own homes.
- Regarding using gardens, a DBS would not be needed if it's a one-off event. But if it's on a regular basis then the church member and partner would need to have an enhanced DBS check.

## **One to ones**

This policy sets out clear and strict guidelines for 1 to 1 ministry between any youth leader and a member of the youth groups at Christ Church Cockfosters (CCC).

A **youth leader** is defined as a leader regularly involved in either youth ministry; Pathfinders or Rooted. The youth leader must have up to date DBS checks and have taken necessary safeguarding training in line with CCC safer recruitment policy.

A **youth member** is defined as any young person in school years 7-13 or equivalent. They do not need to necessarily be attending youth group on a regular basis however this is strongly encouraged.

## **Purpose**

- To partner with parents in discipling young people.
- To bring scripture to the lives of young people.
- To spend time getting to know young people.
- To read the bible and pray with young people.

## **Making Arrangements**

- All 1 to 1 meetings must have the written approval of the Youth Minister.
- All arrangements to meet 1 to 1 with a young person must have written consent from the parent or carer of the young person concerned before any arrangement with the young person.
- Any arrangement that is made must have a clear time and location with parent or carer made aware.
- In the event the youth leader concerned is not the youth minister then the youth leader must be given written confirmation of any arrangements. The youth minister must be notified of any one to one arrangements involving youth members.
- Regularly scheduled meetings are to be seen as the norm. Regular could mean meeting up weekly, monthly, half termly or termly. It is expected that meetings with Pathfinders would not be more often than once per half term.
- The content of the meetings should be made clear to parents before the meeting. They should be informed of: where you will meet, what will happen, why in public, what you study).

- Any arrangement should be made on a single sex basis. Male leader with male youth, female leader with female youth.
- A youth member should only be having 1 to 1 meetings with one youth leader, this can change but is best avoided where possible.

### **Communication**

- Communication between leaders and youth should be private.
- When contacting youth, parents should be copied into communication, e.g. via email
- All and any communication must be readily available to the youth minister or safeguarding officer upon request.
- All communication should take place during reasonable hours (9am-9pm).
- Communication may be made via a WhatsApp group with leaders, where both children AND their parents are in the group. (This could be a small group between the parent, youth member and youth leader)

### **Location**

- Any 1 to 1 session must occur in a public place, e.g. a café or park.
- You must never meet with a young person in a private setting or in your own home.
- You are able to meet at the home of the young person provided their parent or carer remains in the home, but not necessarily in the same room, for the entirety of your meeting.
- You may meet in the 'House Café' in Church House if desired, but only during opening hours.

### **Timings**

- Parents or carers must be made aware of the rough start and end time.
- Meetings should be limited to roughly one hour and once a week except in exceptional circumstances (and are not regularly maintained).
- Meetings should not take place during the very early or late hours. After school until early evening or during the day on a non-school day would be most suitable.

### **Accountability and Confidentiality**

- The youth minister should check in with youth leaders regularly to check on how 1 to 1s are going and to offer support as necessary.
- The youth minister should also check in with the youth members on how 1 to 1s are going. The youth minister should ensure the young person is happy, safe and has an 'out' if necessary.
- Youth leaders must make the youth minister aware of all arrangements and meetings in advance of them taking place.
- Confidentiality cannot be promised in 1 to 1 meetings. In the event a young person makes a safeguarding disclosure then standard disclosure procedures apply.

### **Toileting**

- In the case of babies/toddler, leaders may be required to change a babies' nappy. (For example, in creche groups). Parents must give their consent for this to happen and provide supplies (nappies/wipes etc) needed.
- 3 and 4 year olds: Leaders may be required to take a younger child to the toilet (e.g. 3 and 4 year olds) - in this case, they may enter the toilet room with them, but

remain outside the cubicle door (for example, in the pre-school room, the leader can stand at the doorway between the main room and the toilet cubicle)

- 5+ year olds should generally be able to use the toilet independently. In Treasure Seekers groups the leaders can wait at the door of the Upper Room, and ensure the child enters the toilet halfway down the staircase. Children and young people should have access to toilets without having to be in contact with other users of the premises. Leaders should make sure children return from the toilet safely. In Pathfinders, show them where the toilet door is, and ensure they go into the toilet.

### **Online Zoom guidelines**

- Treat online communication with children (i.e. under 18s) with the same transparency, integrity, and accountability you would have in a face-to-face meeting.
- Protect meetings with a password.
- Two adults with DBS checks should be present in meetings.
- Enable "Waiting Room" function. This protects from being "zoom bombed." Children should not join the meeting until the leaders are present and active, and children should leave before the leaders do.
- Disable screen share and backgrounds for children.
- Keep a register of attendance.
- Written parental permission should be gained for each child (an email from parents will be acceptable).
- Risk assessments should be completed for activities
- Monitor chat logs and save a record of anything concerning or inappropriate
- Parents should be encouraged to "pop in and say hi" at the start of the meeting, and to talk about the content with their child after the meeting.
- 1:1 meetings are only to be arranged via the Children's and Families Minister/Church Safeguarding Officer

## **B4 Activities with adults who may be vulnerable**

### **Definition of a vulnerable adult**

The Department of Health defines a vulnerable adult as a person aged 18 or over who may need community care services because of a disability (mental or other), age, or illness.

A person is also considered vulnerable if they are unable to look after themselves, protect themselves from harm or exploitation or are unable to report abuse.

It should also be recognised that due to differing relationships and contexts within a church coercive behaviour (e.g. by someone misusing positions of power and authority) may render someone vulnerable and at risk of harm, without them being previously defined as "a vulnerable adult" by the above definition.

The following guidelines should be read in conjunction with The Code of Safer Working Practice:

- These recommendations apply to all churches' activities with adults who may be vulnerable – for instance, during worship on Sunday mornings, on outings, in groups and when visiting at home.

- They apply as much to church 'in-house' activities for regular attendees as to activities which are run in and for the local community.
- They are designed to protect the adults who may be vulnerable in a church's care, as well as its leaders.
- As per the risk assessment section above, it is recommended that for all new and existing parish activities where children and adults who may be vulnerable may be included – both one-off and regular – a risk assessment is carried out before it starts or happens, and then reviewed at regular intervals.

### **Active membership and inclusion**

- Create an environment where all people, including those who are vulnerable, are encouraged to participate in and contribute to all aspects of church life.
- Consider how church activities, including public worship, promote and enable the inclusion of vulnerable adults.

### **Respect**

- Always respect the adult who may be vulnerable and all his or her abilities.
- Ask about personal preferences, forms of address and how much help might be needed.
- Ensure his or her individuality; for example, always use their name.
- Give the same respect as to others.
- Respect differences; for example, in appearance, ideas, personalities and ability.
- Don't assume or withhold physical contact – ask first.
- Have a proper conversation using appropriate language; for example, ask about interests.

### **Choices**

- Recognise the choices that vulnerable adults make, even if they may appear risky.
- Give vulnerable adults the highest level of privacy and confidentiality possible in their circumstances.
- Consult with the vulnerable adult about whom he or she wishes to be included in decisions affecting his or her life.
- Offer assistance in such a way as to empower and maximise a person's independence.
- Give vulnerable adults a choice about where they sit and what activities they participate in.
- Ensure that there is clear access to all areas which are available to members of the congregation, for example where coffee is served, the bookstall or where meetings are held.

### **Language and visual resources**

- Always use positive language when referring to disability, age and mental health.
- Consult with individual vulnerable adults to identify their specific needs.
- Use proper sign language for deaf people and those with learning disabilities, as appropriate. Install a loop system.
- Have service books and sheets available in large print.
- Use suitable font size and colours on all printed material.

- Ensure that everyone has access to presentations by offering a clear 'sight line'
- Make information on noticeboards accessible — take into account height, words and images, and size.

### **Premises, and administration of activities specifically targeted for vulnerable adults**

- Check the building regularly for accessibility — doors, steps, toilets, sight lines, lighting, acoustics, colours of walls, doors and paintwork.
- The CSO should make a list of all paid staff and voluntary workers in the church who have regular, direct contact with vulnerable adults, and ensure that full recruitment procedures have been followed for each of them. This should be updated annually.
- For specific activities or groups for vulnerable adults, register every person attending each activity with a form which includes their name, address, and contact number for their parent or carer. Store the forms together in a confidential place, and always have them available for leaders of the activity throughout each session.
- For vulnerable adults who may have erratic behaviour patterns, be clear about what behaviour is acceptable – and what is not – during activities, and discuss, if it is appropriate, with carers.
- Keep an attendance register for each specific activity of every vulnerable adult and leader in attendance.
- Always have a phone available for emergencies throughout each activity; this may be a mobile phone.
- All confidential records about leaders, and confidential records relating to allegations of abuse against members of the congregation, and specific concerns about adults who may be vulnerable, must be securely stored with access limited to the CSO and the Incumbent.
- Record all accidents in the Accident Book, which should always be accessible on the premises. Located in main church office.

### **Leadership of activities**

- For specific activities or groups for vulnerable adults, always ensure that there are at least two people in a leadership role.
- All regular leaders of activities with vulnerable adults should be recruited according to this manual's safer recruitment procedures including taking up references and obtaining any required DBS checks. Training and support in their role should be offered, including a discussion of the Code of Safer Working Practice.

### **Visiting adults who may be vulnerable in their homes (including residential homes)**

- If there are any concerns or risks known before the visit is undertaken, give careful consideration as to whether the visit is absolutely necessary, or whether you should be accompanied by another adult.
- Always work in line with a plan agreed with your pastoral care team.
- Always carry a mobile phone on a home visit and ensure that someone knows where you are and when you are expected to return.
- Do not take unnecessary risks.



- Don't call unannounced – call by arrangement, if appropriate telephoning the person just before you go.
- If you are not known to the person you are visiting, carry with you identification, or a note of introduction from your church.
- Always knock on the door before entering a room or home; respect the person's home and possessions.
- As a general principle, do not give those you visit your home phone number or address. Instead, where possible leave information about a central contact point.
- If you do not know what to do or feel out of your depth, seek advice and if appropriate refer the person to another agency – know where you can access information about other relevant services.
- Do not accept any gifts from adults other than token items, to avoid misunderstandings or subsequent accusations from the person or their family. If someone wants to make a donation to the church, put it in an envelope, mark it on the outside as a donation and obtain a receipt from the Treasurer.
- When referring someone on to another person or agency, talk this through with the vulnerable adult. Ask his/her permission before passing on personal information. If it is more appropriate for the vulnerable adult to do this themselves, make sure they have all the information they need and that their contact will be expected.
- Be clear about your boundaries – keep to agreed limits on how much time you will spend with someone and how often you come. Don't take on extra responsibilities on a bit-by-bit basis. Be realistic about the amount of time you have – do not say yes to every request for help.
- Be clear about what behaviour is acceptable – and what is not – from the vulnerable adult.

### **Needs of carers**

Remember the needs of carers – treat them as individuals, include them if they wish, offer breaks and short times apart and practical assistance if feasible.

### **Financial matters**

If a request is made to a church officer in relation to holding Power of Attorney for a vulnerable adult, advice should be sought from the Diocesan Safeguarding Adviser (DSA). It would rarely be appropriate for a church officer to take on this responsibility.

## **B5 Administering First Aid to children and adults who may be vulnerable**

Adults working with children, young people and vulnerable adults should be aware of basic First Aid techniques. It is strongly recommended that at least one of the leaders in a children's or youth group or group for vulnerable adults has attended a recognised First Aid course, such as a one-day Emergency First Aid Training, and received a certificate. These are run by the St John Ambulance, the British Red Cross, and may be offered by your borough.

A First Aid kit should be available in premises and also on outings and trips. Kits should be easy to access, so if activities take place in different buildings, have a kit on each site.

Where First Aid is required, wherever possible adults should ensure that another adult is aware of the action being taken. Parents and carers should always be informed when First Aid has been administered. A record should be made of what led up to the treatment, what treatment was administered and who was present.

If the injury appears to be serious, the emergency services should be called without delay. If First Aid in an emergency needs to be administered by untrained staff, they should act reasonably and do the minimum necessary to preserve life and limit the consequences of injury until qualified assistance is obtained. There is a risk that a leader undertaking First Aid could face an allegation of negligence if an injury worsens, but this is a remote risk provided the leader has acted reasonably in a genuine attempt to assist in an emergency. Parents or carers should be contacted promptly in the event of an accident to a child or young person or vulnerable adult. In the case of a slight injury, the parent or carer should be told when the child or vulnerable adult is collected, or informed soon after the activity. Leaders should have contact details for the Accident and Emergency Department of the local hospital available, and any other out-of-hours emergency services.

### **Administering medication**

No medicines should be given without the prior permission of the parents or carers. In circumstances where children or vulnerable adults need medication regularly, details should be established as soon as possible, in order to ensure the safety and protection both of the child or adult who may be vulnerable and of the adults who are working with them. Details should be included on parishes' registration and consent forms.

Depending upon the age and understanding of the child or vulnerable adult, they should, where appropriate, be encouraged to self-administer medication or treatment, including for example any ointment or use of inhalers.

## **B6 Holidays and residential trips**

### **Permission for the holiday or trip, and insurance**

A detailed description of the holiday or trip should be presented to the PCC sufficiently in advance so that permission may be given by the PCC and the holiday covered by the parish insurance. If there are to be any potentially hazardous activities undertaken this description must include an assessment of the risks involved, with adequate insurance; or alternatively, a written assurance from the activity centre that it has carried out its own risk assessment and has adequate insurance.

### **Recruitment of voluntary workers to take children, young people and vulnerable adults away**

All leaders must be recruited according to the recruitment procedures laid out in this manual.

### **Communication**

- All leaders should carry a mobile phone, and have the phone numbers of other leaders saved on their phone.

- A list of details of all children, young people or vulnerable adults present on the trip, including emergency contact details for parents or carers, should be carried by a leader at all times.

### **Support of leaders**

- All voluntary leaders should be clear about their specific responsibilities.
- All leaders should know who to go to if they have a concern about a child, young person or vulnerable adult or have any other worries.

### **Premises**

- Insurance, food and hygiene, first aid kit and fire precautions should be checked in advance of the event; written confirmation must be obtained, before the trip, of the operators of the premises' Employers' and Public Liability insurances.
- There must be a qualified first-aider on site.

### **Risk assessment**

- If the residential trip is to a recognised, established venue, leaders should check in advance that the organisation has carried out a risk assessment for the premises and the activities which will be undertaken, and is itself carrying the risk.
- A risk assessment identifying risks in relation to specific needs of service users and actual risks for the holiday should be carried out by the church, and evaluated in advance of the holiday, and action taken to minimise these risks.
- On arrival, leaders should carry out a further risk assessment of the accommodation to ensure the environment is safe for all parties present.
- Staff should familiarise themselves with the fire exits and appliances where they are staying and ensure that these are working. Any health and safety hazards should be reported and dealt with immediately.

## **Holidays and residential trips with children and young people**

No child under the age of eight can be taken away on residential activities without his or her parent or carer.

### **Information to parents**

It is important that parents should have full information before giving consent. This should include:

- aims and objectives of the trip and activities.
- date of the trip and its duration.
- details of venue, including arrangements for accommodation and supervision.
- travel arrangements.
- name of group leader and contact numbers.
- information about financial, medical and insurance arrangements.

### **Parental consent**

Each child or young person under the age of 18 (unless they are over 16 and living away from home or married) must have the written consent of a parent or carer, which gives

authority to the person named as responsible for the activity to take the young person away and to act 'as a careful parent would'. It does not transfer 'parental responsibility'.

### **Accommodation**

For all residential trips:

- boys and girls must have separate sleeping and washing facilities which are private to them.
- mixed groups must have adults of both genders involved.
- adults should have separate accommodation but in close proximity to the young people.
- there should be a rota of awake adults during the night at least until all the young people have settled down.
- Any other arrangements, for example sleepovers, lock-ins or all-night events, should be carefully explained to parents beforehand and their consent sought to the arrangements.

### **Supervision**

- Ratios of helpers to young people should be strictly followed.
- Every group must be led by at least two adults, however small the group.
- When physical activities are planned, staffing levels should be increased accordingly.
- Individual adults must never be alone with children or young people.
- For trips to established premises, clarification of responsibility for leadership and supervision of children between the organisation and the church leaders should be clearly established.
- Parents should be informed beforehand if it is intended to allow groups of young people to go off unsupervised, for example for shopping.

### **Sleeping on church premises**

Churches sometimes arrange sleepovers for children, or church premises may be used, for example during pilgrimages or missional activities. The guidance for taking children away should be followed as far as possible.

- When part of the activity is for young people to remain together as a group, separate sleeping areas must be organised for girls and boys.
- If possible, separate washing and toileting facilities should be provided, or different times for washing arranged, to ensure privacy.
- The required ratio of adult leaders should be followed, including a gender balance.
- Young people under the age of 18 must not be left alone overnight.
- Ensure a rota of awake adults during the night or at least until all the young people have settled down.

### **Risks of fire when on church premises**

Great care must be taken to ensure the safety of the young people from the risk of fire.

- There should be two separate routes out from the sleeping accommodation.
- It must be possible to open all external doors. They should not be locked.
- All exit routes should be clearly marked.

- All internal doors should be kept closed at night to prevent the spread of smoke or fire.
- Portable heaters should be placed in safe positions and turned off at night.
- All adults should have access to a torch and a telephone.
- There should be no smoking anywhere on the premises.
- A list of those present should be hung up near the main exit door. Everyone should know where outside to assemble for a roll call to be completed.
- Anyone discovering a fire should raise the alarm by shouting "fire".
- The Fire Service should be called to all fires. Use the 999 facility.
- Make sure that cars do not block the exits or access for emergency vehicles.
- Adults should know where to locate fire-fighting equipment and how it is operated. This equipment should only be used if safe to do so.

### **Children and young people travelling in cars**

- Any vehicle used for transporting young people should be legal and roadworthy; this includes a valid MOT certificate, appropriate insurance, maximum capacity is not exceeded.
- All passengers must wear seat belts. The only exception to this is modes of transport where a seat belt is not a legal requirement.
- A leader should not usually travel in a car on their own with a young person, nor should a car have more leaders than young people.
- All drivers must obey all the laws of the road and follow the highway code.
- First aid kits should be in each vehicle while in use for church purposes.
- Any young person being transported by a youth leader must first have written parent or legal carer permission.
- In an emergency it is acceptable to transport a young person on a 1:1 ratio or without permission in the event that to not do so would be deemed to be of greater risk, for example in the event of injury or illness requiring urgent medical treatment. In these circumstances all measures to inform parents or carers and get a second adult into the vehicle should be made.
- The youth leader should have emergency contact details of any young person they are transporting.

## **Holidays and residential trips with vulnerable adults**

### **Consent and involvement**

The vulnerable adult should be informed about:

- the aims and objectives of the trip and activities
- the date of the trip and its duration
- the details of venue including arrangements for accommodation and supervision
- travel arrangements
- the name of the group leader and contact numbers
- information about financial, medical and insurance arrangements.

The vulnerable adult should be fully involved in planning and decision-making for the residential trip. If the vulnerable adult is not able to voice their opinion, advocates, such as family members or friends, should be consulted as their representatives.

## **Leadership**

There should be sufficient staff to make the holiday safe and enjoyable, and always a minimum of two leaders on the trip.

## **Accommodation and arrangements**

Careful consideration should be given to:

- the appropriateness of the venue
- the length of journey and mode of transport
- the appropriateness of accommodation
- whether the proposal is affordable for the vulnerable adult's safety
- proximity to any necessary back-up facilities (hospitals, doctors, transport).

## **Health and behavioural needs**

- Advice should be sought and a written declaration of health needs should be obtained if a person has complex health needs, and agreements made in advance for administering medication and care plans for the duration of the holiday.
- Potential areas of risk to the vulnerable adults, taking into account their specific needs, should be identified in advance and plans for action drawn up. This should include health risks (for example, seizures) and challenging behaviour.
- Consideration should be given to the location of and distance to the nearest doctor or hospital in case of an emergency, or in case of the need for specialist care.
- If a vulnerable adult is taken ill or has an accident, or their behaviour becomes difficult to manage on the trip, the decision may be made to return home early. This should not be seen as failing.

## **B7 Safe communication online**

Electronic communication and online activities of all sorts have become an integral part of everyday life. This is particularly the case for children and young people. For the majority of them it has become a significant part of their lives and their preferred way of communicating and often an extension of physical face-to-face relationships.

Communicating online can be beneficial both for those involved in leading and organising church groups and activities and for those with whom they are communicating. In fact, it has become an essential way of communicating with many people, particularly young people. It is therefore important that churches engage with their community and worshippers through such platforms.

Online communication should not be thought of as the default form of communication with young people and vulnerable adults. Whilst online communication and social media can provide great benefits, always consider first whether face-to-face communication would be preferable.

Online communication and the use of social media also pose potential safeguarding risks to children, young people and vulnerable adults and particular challenges to those working with those groups.

All such communication between adults and children/young people/vulnerable adults must take place within clear and explicit boundaries and follow the guidance within this section. Adults should ensure that all communications are transparent and open to scrutiny.

Online technology continues to advance and methods of communication change in popularity over time. The majority of young people and even young children now own a smartphone with access to the internet and many applications such as e-mails, texts, Facebook messenger, Snapchat, WhatsApp and Instagram.

Some of these applications such as Snapchat and Instagram are focused more on young people communicating between themselves and sharing photos, videos and 'stories' and they would think it unusual if an adult chose to communicate with them using that medium.

Media designed primarily to send messages would be more appropriate, such as e-mails and texts, and perhaps WhatsApp as a group messaging forum. Some applications have minimum age limits so it is important to use an app which is appropriate to the age group.

None of us, of whatever age, is immune from encountering problems online. Young people are 'online veterans' compared to most adults, but they almost certainly do not have the life experience and wisdom to handle all the situations they encounter. For all the benefits of social media, unfortunately they carry potential safeguarding risks and challenges.

- The person is not present so that neither party can use facial expressions or body language to clarify meaning.
- The apparent anonymity of communication can lead to a false sense of security about what you say and what images you send.
- Similarly, the instantaneous nature of communication via social media can encourage users to reveal information/images which they would not normally pass on to others.
- Posting personal information can potentially identify and locate a child offline. Online communication cannot be deleted and may be there forever. This could in some circumstances cause significant problems for the young person later in life.
- Grooming – those who wish to abuse young people or vulnerable adults often start with online interaction and then attempt to entice the young people/vulnerable adults into an unprotected face-to-face meeting. This can lead to unwanted contact, exploitation and abuse.
- Those who wish to abuse can easily pretend to be somebody they are not and gain the trust of young people or vulnerable adults. This includes pretending to be a similarly aged young person or someone of a different gender to become their 'friend'. This can be convincing, with assumed identities etc. This can lead to a risk of online abuse, for example persuading young people or vulnerable adults to take part in sexual activity online.
- It can feel like there is no escape from online abuse. Abusers can contact their victims at any time of the day or night, the abuse can come into safe places such as

the victims' bedrooms, and images and videos can be stored and shared with other people or the threat made that this will happen.

- There is the potential for inappropriate relationships between adults in positions of trust and the young people they should be caring for.
- Social media communication can occur 24 hours a day and often late into the evening when adults – and indeed young people – could be under the influence of substances leading to a lack of inhibition and weakened barriers to inappropriate behaviour.
- It is very easy to slip from public communication to private communication.
- If it is private, others are not present to provide guidance.
- Young people and adults who may be vulnerable can be exposed to inappropriate content, including extreme pornography, racist or hate material or violent behaviour.
- There is a risk of online bullying (cyberbullying). This is defined as using the internet, e-mail, online games or any digital technology to threaten, tease, upset or humiliate someone else. This can have serious consequences to the victim's mental well-being. Unfortunately, young people who wouldn't in the 'real world' think of bullying others can become cyberbullies, especially when encouraged by others. The harm caused to the other person may not be as visible to the cyberbully using social media as it would be if they were face to face so the normal inhibitors may not be in place.
- Cyberbullying can be extreme, such as encouraging young people to self-harm or even take their own lives, or pressuring them to send sexual images or engage in sexual conversations which can then be distributed.
- Cyberbullying includes 'trolling' which is the sending of menacing or upsetting messages on social networks, and via chat rooms and online games.
- There can even be financial or legal consequences such as giving out a parent's credit card number or doing something that violates another person's rights.

### **Guidelines for leaders in communicating electronically**

- Maintain good and open relationships with parents and carers regarding communication with them and their children.
- In all communications with young people (up to age 17) parents or carers should be copied into the conversation (e.g. using email contact)
- Only make contact with young people for reasons related to the work of the church and never just to engage in conversation.
- If a young person misinterprets such communication and tries to engage an adult in conversation, the adult must end the conversation or stop replying; suggest discussing the subject further at the next activity which should be in the presence of another adult and, if concerned about the young person's communication, discuss the matter with the CSO.
- Electronic communication should not be the default way of communicating. Face-to-face communication should be used wherever possible, normally at or around the time of a scheduled activity.
- Communication should take place only at reasonable times of the day and never late at night.
- Where possible communicate with a group not an individual.
- Establish a dedicated group with at least two authorised adult users.



- Use the highest appropriate level of security setting and restrict membership to the intended group.
- Where young people are on a rota or in another multi-contact scenario, distribution groups should be set up to ensure that individual contact details are not shared.
- Set personal profiles on any social networking site to the highest form of security to avoid access to personal information.
- Do not use a personal account to communicate.
- Ensure that the particular form of social media employed is age-appropriate.
- Only give personal contact details to young people that are within the public domain of the church, including your mobile telephone number.
- Where possible another adult (parent or leader) should be copied into all communication with young people or adults who may be vulnerable. This should be an overt copy rather than a blind copy.
- Where possible use only equipment provided by the church to communicate with children (such as the vicarage or parish office phone, or a mobile phone purchased specifically for the work).
- Never 'friend' or 'follow' children or young people on social media while they are under 18 or still able to attend Rooted youth group.
- Communicate clearly, don't abbreviate or short-cut communications and obviously never use inappropriate language.
- Use an appropriate tone: friendly, but not over-familiar or personal.
- Be aware that boundaries of relationships can become blurred on social media.
- Be warm and friendly, but do not suggest or offer a special relationship.
- Be careful how you sign off: consider, for instance, how 'love' and 'XXX' might be perceived and misinterpreted by the young person and never sign off in this way. Use the name you would expect them to call you in person.
- Avoid the use of emojis or other symbols.
- Photographs and videos of young people must not be posted on social media without the consent of their parent, given in writing on a consent form. Encourage the parent to discuss this with their child first.
- Photographs and videos of adults who may be vulnerable must not be posted on social media without their consent or that of a carer, given in writing on a consent form. Encourage the carer to discuss this with the adult who may be vulnerable before consent is given.
- Be clear and explicit about information that you need to share; do not abbreviate or short-cut your communications.
- Make sure that communication would not cause embarrassment if it were seen by the young person's parents or church officials.
- Do not share any personal information with a young person, or request or respond to any personal information from the young person, other than that which might be appropriate as part of your role.
- Be circumspect in your communications with young people to avoid any possible misinterpretation of your motives or any behaviour which could be construed as grooming.
- Respect the young person's confidentiality unless abuse is suspected or disclosed.

- Recognise that text messaging is rarely an appropriate response to a young person in a crisis situation or at risk of harm.
- Store e-mail, texts and other messages for as long as possible. If a message contains anything which causes concern, print it out and/or retain on file/hard drive.
- It is advisable to have an agreed supervisor of any group accounts. The young people should be made aware who this is. This should be documented and consider notifying the CSO so they can keep a record.

### **Inappropriate content**

- Any inappropriate posts must be removed immediately by the supervisor or other adult, explaining the reasons why and informing anyone who may be affected as well as the parents or carers of any young people involved. However, for evidential reasons, before the posts are removed, they should be printed out and retained on a file or hard drive and/or a screenshot taken.
- If young people and vulnerable adults notice inappropriate content, they need to know to whom they should report this.
- Any disclosures of abuse on social media or content leading to concern that a young person or vulnerable adult is at risk of harm must be handled in the same way as a face-to-face disclosure.

### **Criminal offences**

Despite the law still being under review for some aspects of online offending, there is current legislation which makes it an offence to:

- send messages that are grossly offensive or of an indecent, obscene or menacing character.
- send a communication with the intention of causing distress or anxiety.
- make, distribute, possess or show any indecent images of anyone under 18 years (see *Sexting*, below). Section 67 of the Serious Crime Act 2015 inserts a new section into the Sexual Offences Act 2003 which criminalises conduct where an adult sends a sexual message to a child.

### **Sexting**

- 'Sexting' is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. This includes messages and images sent between people who have never met each other and have only had contact online but it also includes friends, boyfriends and girlfriends. It is more common between young people who know each other who have often treated it as harmless fun without thinking of the consequences.
- These messages can be sent using mobiles, tablets, smartphones, laptops – any device that allows the sharing of media and messages.
- Sexting may also be called:
  - trading nudes
  - Dirties
  - pic for pic
  - underwear shots

### **What the law says about sexting**

Creating or sharing explicit images of a child or young person is illegal, even if the person doing it is a child and even if all parties consented.

It is an offence to make, distribute, possess or show any indecent images of anyone aged under 18. 'Make' includes taking the image.

A young person is breaking the law if they:

- take an explicit photo or video of themselves or a friend.
- share an explicit image or video of a child or young person even if it is shared between children of the same ages.
- possess, download or store an explicit image or video of a child or young person, even if the child gave their permission for it to be created.

The following sequence of events is an example:

*A 16-year-old girl sends a semi-naked photo of herself in her underwear to her 17-year-old boyfriend. Her boyfriend hadn't asked her to do this and they haven't exchanged photos of themselves before. The 17-year-old boyfriend then has possession of the photo on his phone. The 17-year-old boyfriend then shares the photo with his best friend, who is also 17. This friend then shares the photo with his 14-year-old brother, who shares it with his 13-year-old friend.*

All of the above people have committed an offence under the Protection of Children Act 1978.

However, even if an offence has technically been committed, the police guidance from 2016 is that sexting by children will primarily be considered as a safeguarding issue. If the matter is reported to the police, then by law they need to record the incident on their crime system but they can decide not to take further action against the young person if it is not in the public interest. This has become known as 'Outcome 21'.

Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they are a risk.

### **Why do young people sext?**

There are many reasons why a young person may send a naked or semi-naked picture, video or message to someone else.

- Joining in because they think that everyone is doing it.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.
- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent.
- It may involve something more serious such as grooming, harassment, blackmail or exploitation.

### **What are the risks of sexting?**

An obvious risk is that the young person could be committing a criminal offence, which, even if the police decide not to take any action, could lead to a distressing and stressful process for the young person and those around them. It is easy to send a photo but the sender then has no control about how it is passed on.

When images are stored or shared online they become public. Some people may think that images and videos only last a few seconds on social media and then they can be deleted but there is always a risk of them being shared or copied by others.

Sexting can leave the young person vulnerable to blackmail, bullying, unwanted attention and emotional distress, humiliation and embarrassment.

### **What to do if an incident of sexting comes to your attention?**

*This advice does not include the sharing of indecent images of young people under 18 by an adult as this constitutes potentially serious offences of child sexual abuse and must be handled as a report of abuse and referred appropriately.*

- Do not view, download or share the imagery yourself, or ask a child to share or download it.
- If you have already viewed the imagery by accident (for example the young person has shown it to you before you could ask them not to) then don't share it or save it.
- Always refer the matter to the CSO who may in turn wish to seek the advice of the DST.
- Record all incidents of sexting including both the actions you did take as well as the actions you didn't and give justifications.
- Careful consideration needs to be given as to whether the matter can be dealt with in consultation with the parent or carer or whether the matter needs to be escalated to reporting to the local authority and police.
- As a general guide the incident should be reported to the police if:
  - the incident involves an adult
  - there is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent
  - what you know about the image suggests that the content depicts sexual acts which are unusual for the young person's age or are violent
  - the image is of sexual acts involving young people under 13
  - you have reason to believe a young person is at immediate risk of harm owing to the sharing of the image, for example the young person is presenting as suicidal or self-harming.
- If none of the above apply then, in consultation with the CSO and if necessary the DSA, a decision can be made not to refer the matter. The reasons for this must be clearly recorded.
- The decision not to refer must be based on consideration of the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of the young people.
- Parents or carers should be informed and involved at an early stage unless informing the parent may put the young person at risk of harm.
- A decision not to inform parents or carers must be made in conjunction with other services such as the local authority and/or the police.

- Where appropriate the young person should be involved in deciding the best approach to inform their parents.
- Be aware of the emotional distress and pressure young people may be suffering following the discovery of an incident of sexting and offer reassurance and support and consider providing the young person with helpline phone numbers such as ChildLine and the NSPCC. Becoming aware of a case of sexting can lead to complex and difficult issues and it is important to recognise this and seek professional guidance.

### **Use of shared computers and technology**

- Appoint one or more responsible administrators of all parish computers, who alone has access to setting the controls on all machines.
- Ensure that all shared computers have a different password for all users so that confidential information cannot be accessed inappropriately.
- If you permit or provide internet access on your premises, or allow access while young people are in your care, ensure that leaders are themselves conversant and comfortable with the technology.
- Monitor and supervise use of the internet, mobile phones and games consoles, or any interactive or other technologies you provide or allow to be used. You may wish to have written 'acceptable use' guidelines which describe your expectations of leaders and young people alike.
- Set the parental control level to limit access to inappropriate sites. Consider using a child safety software package, which allows you to control access to particular parts of the internet, for example chat rooms, or limit the amount of time a young person might spend online, or block access to certain types of material, or disable specific applications. Further information about this can be found on the NSPCC online safety website (<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/>).
- Think about the location of any computers used to access the internet on your premises. Can their use be easily supervised?
- In relation to games consoles with interactive capabilities, only permit age-appropriate games to be played, and establish what safeguards are built in to the console in relation to the possibility of communicating with other players. Consider also the values you are imparting through the games you use, particularly in relation to violence.
- If you are concerned that there may be illegal downloads on computers, or that computers have been used inappropriately, ask a reputable IT consultant to undertake a full system scan, and to recover deleted or removed items.
- If illegal material is identified, it should be reported to the police and to the DST.

### **Use of social networking sites**

Personal social networking accounts and profiles should not be used for work with vulnerable groups – create a separate church group page related to your church role and for communications with young people and vulnerable adults. Ensure that young people and their carers are aware of who is responsible for content. Be cautious about accepting friend requests from church members and do not accept them from children and young people.

## **Safety tips for young people**

- THINK BEFORE YOU POST about what you are thinking, feeling or doing. Even though you can delete something (a post, picture, comment etc), you cannot permanently erase something which has appeared online. Once you press send, it is no longer private.
- If you wouldn't want your teachers or parents to see it, it is probably best not to post it. Remember – once it's posted, it is out of your control.
- When online and using social media, never give out any personal information about yourself, your family or anyone else, for example mobile or other phone numbers, address, school or place of work.
- Never send a photo to someone you do not know and trust in the real world. The wrong kind of image can give the wrong impression.
- Never share sexual images of yourself or others online. Once you have sent it you can't control what happens to it and you may be committing a criminal offence – see *Sexting*,
- Log into chat rooms using a nickname and be careful what you disclose about yourself in your personal profile.
- Chat safely – you can never be sure who you are dealing with. Remember: they could be deceiving you.
- Never arrange a real-world meeting with someone you only know through the internet. Even if you get on with them online, you cannot be sure who they really are.
- Don't pretend to be someone or something you are not in a way that might hurt someone else's feelings or cause them upset.
- Don't post anything which is abusive or offensive. You could be committing a criminal offence but also causing someone distress. Don't message someone online with anything that you wouldn't say if you were with them face to face or wouldn't want to be said to you.
- Always password protect your accounts and check your privacy settings. Use complex passwords that are hard for others to guess and use a mix of letters and numbers. Change them regularly.
- If something happens in an online chat room or on any social networking site that makes you feel uncomfortable, leave the site. Tell an adult you trust and, if you can, keep a copy of what it was that upset you.
- If you end up on a website or social networking site with material which you find upsetting or offensive, leave the site and again inform a trusted adult.
- If you are not using your webcam, unplug it or cover the lens or point it at a blank wall.
- If you are being bullied online, report or block the person. Do not reply to nasty, abusive or threatening messages. Do not be forced into sending personal or embarrassing information or photos. Talk to an adult you trust.
- If you see someone being bullied online, let the person know you are there for them. Don't share, comment on or 'like' nasty posts or videos – even when being supportive this can lead to more people seeing it. If you are worried about someone's safety, speak to an adult you trust or to a helpline such as ChildLine.

## **B8 Taking and publishing photographs and videos, including on websites**

The taking and publishing of photographs and videos is usually enjoyed by children and parents, and by adults who may be vulnerable, and can bring good publicity, but steps need to be taken to ensure that privacy is respected and no embarrassment is caused. The issues are the same for still photographs or films, and regardless of the particular technology used. They also apply to audio clips from individuals. For convenience they are all referred to as images.

Images count as personal data under the Data Protection Act 2018 and the General Data Protection Regulation 2018. It is therefore a legal requirement that the consent of the adult who may be vulnerable, or child and his/her parent or carer is obtained for the taking and using of images.

### **Guidelines**

- Do not take pictures of children or adults who may be vulnerable without another adult present.
- When an image is taken for publication or distribution, those being photographed should be aware that it is being done. Awareness can be assumed if:
  - people are attending a photo-call
  - the intention of taking images is included in the invitation to the event and people are given the option of opting out.
- Ensure that any use of images reflects the diversity of age, ethnicity and gender of the activity.
- Ensure that professional or amateur photographers commissioned to photograph events are given a copy of this procedure and agree to abide by it.

### **Consent**

- Except in the above circumstances, consent should be obtained before taking and using images, and a chance to opt out must be given.
- Consent need not be in writing if it is not proposed to publish the images in any way; but if they are going to be displayed, used in a newspaper or magazine (including the Diocesan or parish newspaper or magazine), or put on a website or used in social media then specific written consent should be obtained. Here, consent is gained and recorded through ChurchSuite.
- Images should only be used for the specific purpose agreed by the person photographed. Written consent must specify what purposes the image will be used for, and how it will be stored if not destroyed. If the intention is to use an image on the internet, this must be clearly stated at the time that consent is sought. Further written consent is required if images are to be used in ways other than originally specified.
- For children under 13, written consent must be obtained from parents or carers.
- For young people aged 14-17, written consent must be obtained from parents or carers and the young people themselves.
- For vulnerable adults, images should only be used for a purpose which is explained to them, and to which they give their recorded and preferably signed informed consent; in other words, they understand and agree. They should see the photograph before being asked to give consent. The person who obtains the

consent should sign and give their relationship to the person photographed, and the name and address of the organisation for which they work or volunteer.

- If the vulnerable adult cannot give informed consent the images should not be used, unless the individual cannot be identified from the photograph.
- For any photographs submitted to the Diocesan Communications Department for use in any Diocesan communication (for instance in the Diocesan newspaper or on the Diocesan website), it will be assumed that the parish has obtained the consent of the vulnerable adults or parents/carers and children before such submissions are made.
- In the case of a general photograph of a public event, such as a church fête, where no individual or group of people is the focus, prior consent of everyone is not required. It is still appropriate to consider carefully where and how such photographs should be displayed.

### **Best practice with publication of images**

- Think carefully before taking any images showing children and young people on your website, social media or other publications. Consider what the images will be used for and whether consent will be required.
- Do not supply full names of children along with the images, unless:
  - it is considered necessary, for example celebrating a performance or achievement
  - the child and parent(s) or carer(s) have consented.
- Only use images of children in suitable dress or kit, being particularly mindful of some activities (for example, swimming) which involve partial states of dress. Additionally, avoid pictures of children in school uniform where the name of the school is visible.
- Keep images of children securely:
  - hard copies of images should be kept in a locked drawer
  - electronic images should be in a protected folder with restricted access.
- Images should not be stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones. If such storage is unavoidable, the images should be kept in a password-protected folder or on a device protected with a code or some other secure method of access such as fingerprint identification.
- Avoid, if possible, using any personal equipment to take photos and recordings of children on behalf of the church – use only cameras or devices belonging to your organisation. This may not always be achievable but it is best practice. If personal equipment has to be used for church purposes, delete the photographs of individual children once they have been used for the purpose for which they were taken.
- For guidance on the Data Protection Act and other privacy regulations, visit the information commissioner's office (ICO) website at <https://ico.org.uk>

### **Images taken by participants**

- If, at a church-related event, children or adults who may be vulnerable use cameras or mobile phones to take photos of each other, or if parents or carers take photos of children or adults other than their own, they should be advised that these are for personal use only and should not be displayed in any publicly accessible space, including on the internet or social networking sites.



- Schools, including church schools, will have their own policies which apply to children on school premises or engaged in school-sponsored activities.

## **B9 Drugs and alcohol use and children and young people**

These guidelines are aimed at providing workers with a clear practical framework to enable staff and volunteers to work with young people in a positive, drug-free environment.

### **General principles**

- The Parochial Church Council (PCC) does not condone the use of illegal drugs or alcohol nor their illegal supply.
- The PCC will work proactively with young people to enable them to make informed decisions about drug and alcohol use.
- The welfare of young people must be paramount at all times.
- Anyone whose behaviour is disruptive owing to alcohol or drugs will be challenged and may be asked to leave. Consideration should be given to contacting parents.
- Should a young person be identified as experiencing problematic drug or alcohol use, they should be offered support, guidance, and relevant referral if needed.
- The youth and children's workers will observe the current legal framework and act within it.
- Youth and children's workers will not take illegal substances, and will make sure that, whilst working with children or young people, they are not under the influence of alcohol or legal drugs which affect their ability to work effectively.

### **Incident recording**

- An incident book will be maintained. This book will record all incidents including drug- or alcohol-related incidents. This should not be a loose-leaf file.
- It should be stored securely.
- Staff should endeavour to record accurate details as soon as possible following an incident.

### **Confidentiality**

- The PCC aims to protect the young person's right to privacy
- However, unconditional confidentiality cannot be guaranteed where the young person's actions or behaviour represent a serious risk to the safety or well-being of other members, workers or the community at large.

### **Working with police**

In circumstances where a worker is given, finds, or confiscates an illegal substance, there is no legal obligation to contact the police. It is, however, beneficial to maintain an effective working partnership with the local police.

### **Contact with parents**

- In cases of immediate risk to the health of the child or young person, the parents will be contacted and also emergency medical services if required.
- If the worker believes parental contact would exacerbate the situation (for example, the family home may be an important factor in the young person's drug

use) he/she must discuss the situation with the CSO prior to any contact being made.

### **Use of alcohol**

The PCC needs to adapt its procedures for the use of alcohol according to the kind of event or activity which is being organised. For example, an event where there are many adults, and most young people are with their parents, needs different arrangements from a residential stay, where a group of young people is supervised by youth leaders.

### **Legal requirements**

- If alcohol is to be sold, a licence is required.
- For the majority of events in churches and church halls which are likely to be considered, a temporary event notice may be appropriate. These are available from licensing authorities (district councils and unitary authorities).
- Where a licence is granted, alcohol may not be sold to people under the age of 18, nor may they be supplied with it or consume it.
- You are advised to ask for proof of identity if a person appears to be under 18.
- There is an exception where the consumption is to be on the premises, where the young person is aged 16 or 17 and is accompanied by an adult and is having a table meal. The only alcohol they are allowed to consume is wine, beer or cider.
- A person under 18 can work as a waiter or waitress and deliver drinks to the table.
- People under 16 may attend, although conditions may be imposed if desirable or necessary.
- For further details consult the local authority Licensing Officer, or your insurance company, or see the Licensing Act 2003 and its associated guidance.

### **Good practice**

- If alcohol is provided but not sold, no licence is needed.
- However, it is sensible to follow the same restrictions as in the guidance for licences, namely no alcohol for people under 18, with the same relaxation for 16- and 17-year-olds having meals with an adult. This has the advantage of being consistent with what young people expect elsewhere.
- You are advised to ask for proof of identity if a person appears to be under 18.
- At youth groups and activity events with young people neither youth leaders nor young people should consume alcohol.
- This also applies on residential trips when youth leaders are not on duty. Youth leaders are reminded that they are role models for young people at all times.

### **Use of drugs: Good practice**

Any necessary medication, whether prescribed or off the shelf from a pharmacy, should be noted on the parental consent form. Use of illegal drugs on the premises or on organised trips is never permitted. If a young person is suspected of carrying drugs, they may be asked to turn out their pockets, but personal searches are not appropriate.

Instead, the police should be contacted. Illegal drugs will be confiscated and either disposed of immediately or passed to the police. Two staff members should be involved. Details should be recorded in the incident book.

In dealing with drug-related situations, establish and be clear about the nature of the incident before deciding on any course of action.

### **Finding drugs**

If workers find any drugs, including prescribed medication, in a communal area these will be removed, to limit the risk to others.

The law allows youth workers to confiscate illegal drugs, but they must be destroyed immediately or handed to the police (it is not a legal requirement to inform the police from whom the substance was taken).

If the drug is prescribed medication it will either be returned to the owner or handed in to a pharmacist.

### **Disposal of illegal drugs**

- Where the quantity of drugs found is large (implying supply) the police should be notified.
- Small quantities of drugs can be flushed away. The incident must first be logged and should be carried out in the presence of another worker.
- Disposal should be carried out as soon as practicable, otherwise the worker could themselves be open to charges of possession.
- Workers must take extreme care if disposing of needles. If no sharps bins are available they should be carefully placed in a safe place (for example, a drinks can) until proper disposal can be arranged.

### **Use of illegal drugs on premises**

- The PCC will not tolerate the use of any illegal drugs on the premises.
- Where workers suspect drug use they must always take action. This may include the young person being asked to leave, or the police being contacted.

### **Smoking tobacco**

- Smoking is illegal in any enclosed public premises.
- There is no minimum age limit for smoking, although those under 18 are not permitted to buy tobacco products.
- Passive smoking (being in the presence of smokers) is a health hazard.

### **Good practice**

- It is never appropriate for adults to smoke in the presence of young people.
- Young people who are smokers should be advised of a designated area away from others.
- On residential trips, it is appropriate to include a question on smoking on the parental consent form to establish parental knowledge of the young person's smoking.

### **Hirers of premises**

Establish whether or not alcohol is to be sold at the event. If it is, the hirer is responsible for applying for a temporary event notice, which should be seen by a PCC representative before the event.

Consider whether conditions need to be imposed on the involvement of young people in the event, and incorporate appropriate conditions in hire agreements (see *A Safe Church*, Section 10, Appendix 12a for a sample safeguarding provision form to be attached to any agreement on hiring church premises).

## **B10 Acceptable behaviour by children and adults who may be vulnerable**

Churches attract people with a diverse range of needs and are good at welcoming them.

From time to time, children and adults who are vulnerable may present behaviour which is challenging both for individuals and for other members of the congregation or the group concerned. This may include behaviour affected by mental health issues and learning disabilities. In such circumstances, behaviour perceived as disruptive may be the person's attempt to communicate. In every such situation, we have to make a judgement about what behaviour can safely be tolerated, and what behaviour must be restricted or prevented for the safety of all concerned. It sometimes helps to have discussed and publicised some ground rules for acceptable behaviour by all, and for church or group leaders to have worked out how they will enforce such expectations. Involving children and vulnerable adults in developing agreements on 'How we treat each other' can be a meaningful exercise.

### **What always constitutes unacceptable behaviour?**

We each have different thresholds of what counts as unacceptable behaviour from another person. The following behaviours, however, are never acceptable and should always be challenged and addressed, whatever a person's age, ability or mental health:

- abusive or threatening behaviour
- violence or risk of violence
- misuse of drugs or alcohol on premises
- someone under the influence of drugs or alcohol
- harassment
- racist behaviour
- bullying behaviour.

### **Who is particularly at risk from unacceptable behaviour?**

The following list is not exhaustive, but these groups of people should think through how any of the behaviours above would be responded to, and how their situation can be made as safe as possible:

- clergy at home or on their own, and their families
- vulnerable members of the congregation in church (especially in small groups)
- leaders of activities
- workers in church.

### **What precautions can you take?**

Build in some of the following as ground rules for how you run things in order to help to minimise risk.

- Don't allow anyone you think may pose a risk into your home or any environment where you are alone.
- Keep doors locked if you are in church alone or in a small group but let people know why and how they can exit the building.
- Always aim to have at least two adults present.
- Always have access to a phone.
- Have readily available contact details for emergency services, church leaders and so on.
- Do regular risk assessments of activities.
- Set ground rules for belonging/joining activities or groups — and stick to them.
- If challenging behaviour becomes part of a group's culture, leaders should meet to plan how to address it.
- When challenging behaviour arises, leaders should meet to debrief after the meeting, in order to learn from mistakes, make a record, and decide what needs to be done and how leaders will be supported.
- For vulnerable people you know, develop contact with carers and support agencies, and take advice on how to respond to challenging behaviour.
- Gain an understanding of particular disabilities or mental health issues in order to understand certain behaviour better.
- Learn how best to communicate with adults with specific vulnerabilities.
- Refer to health or care agencies if you are concerned about someone's behaviour.
- If the behaviour of a vulnerable adult is known to be erratic or challenging, work out with them, and in association with their primary carer, an agreement on how their behaviour will be managed and what sanctions applied if necessary.
- If you have received threats of violence or intimidating behaviour, inform the local police and ensure you have a plan for how you will respond if an incident occurs.
- Inform and take advice from the DST.

### **Working with disruptive children**

If a child or young person is being disruptive:

- ask him or her to stop
  - speak to the child to establish the cause(s) of upset
  - inform the child that he/she will be asked to leave if the behaviour continues
  - consider at every stage calling the child's parent or carer and talk to the parent about the behaviour
  - warn the child that if he/she continues to be disruptive, this may result in longer-term exclusion from the group or activity
  - where possible, have a team strategy for handling disruption, such as engaging leaders of other groups taking place at the same time in management of situations.
- If a child is harming him/herself, another person or property, then:
- escort other children away from the area where the disruption is occurring
  - at the same time, another worker should ask the child to stop
  - if the request is ignored, warn him/her that you may call for additional help (such as the police) if they do not stop
  - if they do not stop, call the police or other appropriate professional help
  - in exceptional circumstances, you may need to restrain the child to prevent them harming themselves, others or the property whilst you wait for the police

- ensure that the parent or carer of both the child and any other child affected by the disruption (especially a victim) are informed of the incident as soon as possible after it has taken place
- record the event as soon as possible after the incident, and inform someone outside the situation, preferably the Incumbent or CSO
- after the incident, consider what longer-term sanctions are appropriate regarding this child, and what safeguarding steps are needed regarding others in the group. If necessary, take advice from the DSA.

### **Guidelines on managing violence and aggression**

The context of these guidelines is managing violence and aggression within a church situation and among a group of people who are there voluntarily with leaders or helpers who are also for the most part volunteers.

There can rarely be justification for knowingly involving church volunteers in situations which put them at personal risk, either physically or emotionally. (Verbal abuse can be as hurtful, and indeed traumatic, as a physical attack.) It should be safe to assume that the carers of a potentially violent individual would not consider it appropriate for that person to participate in social or other activities if he/she was known to pose a risk to other people.

However, violence and aggressive behaviour is, by its nature, often unpredictable so some guidelines for dealing with emergency situations are suggested below.

- Always remember that de-escalation of a situation can resolve it – confrontation just makes it worse.
- Our body language is very important and often communicates far stronger messages than those we articulate verbally, so adopt:
  - a relaxed and non-aggressive stance, with feet apart for balance
  - a relaxed but attentive facial expression
  - appropriate eye contact (neither avoiding nor staring)
  - relaxed jaw (unclench your teeth)
  - relaxed hands (not clenched fists) hanging by your side.

#### Do:

- always name yourself (if the person doesn't know your name)
- address the person by name
- speak loudly enough to be heard by the individual concerned but not necessarily by everyone else in the room
- try to manoeuvre into a place of safety: move slowly away from stairs and glass windows to somewhere with an exit, where the person won't feel cornered or trapped, and where there are other people around who are aware of what is happening
- stand more than an arm's length away from the person, partly so that they cannot grab hold of you but also so that you are not invading their personal space (a characteristic of aggressive behaviour is invasion of another person's personal space so keeping your distance also protects your own space)
- avoid physical contact
- stand at an angle, not face to face, thereby reducing eye contact

- keep yourself calm by taking a few deep breaths to slow your heart rate
- be aware that the person has feelings they are trying to express and that they may be frightened by the situation they have created and not know how to get out of it
- make a record of the event afterwards and discuss what has happened with others to see if a future recurrence can be prevented.

### Don't

- try to deal with the situation alone
- shut the door treat the person with respect
- threaten with any sort of weapon
- use physical contact
- push into a corner
- invade personal space
- shout
- point or clench your fist
- outstare
- move suddenly or threateningly
- let your feelings, or anyone else's, override good practice and common sense.

## **B11 Guidelines for pastoral care and counselling practice**

All forms of care need to have clear and specific boundaries. See *Activities with children and young people*, and *Activities with adults who may be vulnerable*, for best practice guidelines.

In one-to-one pastoral care or counselling, norms for practice include the following:

- to avoid harming the recipient by what is done or not done
- to acknowledge that the relationship between carer and recipient is at that time asymmetrical and unequal. No advantages, personal, sexual or financial, should accrue to the carer from the relationship (except through those financial arrangements agreed in advance by contract).
- to accept that the recipient is always to some extent dependent upon the carer. The relationship of dependency places power in the hands of the carer. There needs therefore to be a continual effort to understand the nature of the pastoral relationship so that power does not become abused or misused. The carer should therefore avoid acting in such a way that the recipient misunderstands the nature of the relationship.
- to work in such a way that the individual's or family's context, culture and social group are always respected.
- to maintain the principle of confidentiality within any limits that have been agreed in advance with the recipient .
- to maintain knowledge and skill for competence in caring and to be clear about the limits of competency.
- to enable recipients to be free to disengage at any point.
- to ensure work is supervised regularly by people who are competent to do so.
- If the Pastoral Carer is a trained counsellor, he/she should discuss this with their counselling supervisor before offering to provide the person with counselling

themselves and shifting the relationship into a formal counselling agreement. In such circumstances the Pastoral Carer needs to ensure that the person understands the contractual/formalised boundaries and conditions of counselling.

- Pastoral Carers who are regularly providing formal pastoral care should be accountable to their church or organisation and be resourced themselves through regular, appropriate oversight and support for their pastoral care work.
- It is essential that confidentiality is maintained within any oversight / support / supervisory arrangement for the Pastoral Carer. For some it may be more appropriate to access support from outside their own church congregation to help ensure that confidentiality is not compromised.

### **Vulnerability of the carer**

Pastoral Carers have a right to decline offering care and or seeing someone on their own, if it feels unsafe to do so e.g. with a person who is under the influence of alcohol or drugs or who are 'acting out' aggressively

- Pastoral Carers who are working formally may want to ensure their church has adequate insurance to cover their activities or to take out their own indemnity insurance with a suitable insurance company.
- In pastoral one-to-one situations, the carer is vulnerable to potential misunderstanding or abuse. Where the carer feels they are in a position of such vulnerability, they should consult with their Diocesan Safeguarding Adviser (DSA) at an early stage for advice and support, regardless of whatever agreements of confidentiality the carer may have with the recipient.

### **Care of survivors of abuse and their families**

Many children or adults in the church may be suffering from the effects of abuse. They may be unable to say what their problem is, or even to know why they feel ill-at-ease and unable to feel a sense of well-being. Adults and children who are abused can lose trust in those around them, especially if the abuse was within the home and this is likely to affect their faith and relationships.

When caring for those who have been abused ensure they:

- are not pushed into forgiving – this is a complex process, and considerable damage can be done by treating forgiveness as something that they must do unreservedly and immediately.
- are not put in a position of feeling even more guilty than they already do. Survivors tend to feel that the abuse was their fault.
- are accepted as they are, however full of anger they may be. Anger can be seen as one step along the road to recovery and forgiveness.
- are encouraged to see themselves as survivors rather than victims, with strength and ability to move forward in their lives.
- are given a sense that those within the church community who know about the abuse are 'with them' along the road to recovery. The journey can be long, and supporters are essential. Some may leave abusive relationships and then return, yet still need support.

Abuse of an adult or a child may have a profound effect on the survivor's wider family, whose members may also need support and assistance in accepting that the abuse has



occurred. Family members may not always be supportive to the survivor, especially if the abuser is known to them; it may sometimes be easier to accuse the survivor of fabricating the abuse than to face the fact that someone they care about is an abuser.

### **Survivors of domestic abuse (summary)**

More information about domestic abuse can be found in 'C3 Supporting domestic abuse'.

Survivors require patience, time and reassurance. Those surviving domestic abuse may disclose it to those in a position of pastoral responsibility or to someone in the church that they trust.

The role of that person is:

- to focus on the safety of the person making the disclosure and any children
- to provide a safe space for survivors to disclose abuse
- to support and reassure survivors with a non-judgemental attitude
- to provide survivors with information and refer them to relevant agencies
- to emphasise those aspects of the survivor's faith which prioritise their equality, right to be free from abuse, their safety and the perpetrator's personal responsibility for ending the abuse.

The role is **NOT**:

- to tell the survivor to take any specific course of action, but to encourage them to think about options that can increase their safety and that of their children
- to act as their caseworker
- to use potentially harmful interpretations of the Bible or the church's moral teaching to put pressure on people in abusive relationships.

### **Important things to remember:**

- the safety of the survivor and any children is paramount
- the experience of abuse or violence within a relationship is often complicated by feelings of love towards the perpetrator and hope that they will change their behaviour. This means that there are very rarely simple solutions.
- if someone is experiencing domestic abuse their lifestyle is likely to be stressful and sometimes chaotic. Their confidence may be low, perhaps magnified by the stigma communities frequently place upon survivors.
- you will only ever get a snapshot of the relationship, not the whole picture
- survivors may minimise the levels of abuse they are experiencing, so it may appear to you as if their fear is exaggerated.
- the relationship is not static, which means that the survivor's attitude to themselves, the abuse and the abuser will change over time.

### **Mediation and marriage counselling**

Research has shown that couples-based work is not an effective way to address a spouses abusive behaviour of the other. While these spaces may appear safe, the abusive repercussions for victims who speak out in front of an abusive partner can be serious. In addition, it is unlikely that a victim will feel free to speak openly about his or her experiences while the abusive partner is in the room.

Couples-based work also implies that both partners have a problem, rather than placing responsibility on the perpetrator. It is important to remember that mediation or couples counselling can put a victim at serious risk, and in some cases may be fatal.

### **Information-sharing and confidentiality**

Those who experience domestic abuse are likely only to approach those they feel are worthy of their trust. Trust is tied to the idea of confidentiality.

Without confidentiality, they are less likely to talk about domestic abuse. It is important, however, to explain to those who disclose abuse that there are limits to confidentiality; if there is a reason to suspect that children are at risk of significant harm or have been harmed, or that an adult is a risk to him/herself, or to others because of his/her mental health, confidentiality must be extended and the appropriate social care agency or the police informed. In such circumstances, there should be full co-operation with agencies supporting the survivor, social care services and the police.

If information needs to be disclosed or a referral made in the context of domestic abuse, always try to obtain the consent of the survivor before sharing it.

### **Refuges**

A refuge is a safe house where women who are experiencing domestic abuse can live, free from abuse. A woman does not have to be living with the abuser to be offered help. Women residents of refuges must keep their location confidential. This means they will not be able to tell friends or family where they are staying.

All refuges offer a safe place to stay, information, advice and support. The help offered includes the mutual support of others in similar circumstances. The refuge will provide a support worker to help each resident develop a support plan. Women are usually given a refuge place outside their own borough or immediate local area for their own safety. Some women may stay for a few days, others for several months. Some women stay in refuges for a break from violence and time to think, away from danger. Some women decide to return to their partners to try again.

Our local services are: <https://www.solacewomensaid.org>. There are some specialist refuges working with women from black, Asian and minority ethnic (BAME) communities, and women who identify with a specific faith. To access a refuge space, or find out about services for specific communities, contact the freephone 24-hour National Domestic Abuse Helpline on 0808 200 0247, or visit [www.womensaid.org.uk](http://www.womensaid.org.uk) or [www.refuge.org.uk](http://www.refuge.org.uk).

### **Care of perpetrators of abuse and their families**

The majority of abusers have also been abused themselves at some time in their lives and are therefore also survivors of abuse. However, any help or pastoral support provided by the church to offenders of abuse against children or adults who may be vulnerable needs to run alongside the monitoring of the individual by the police and probation service. Multi-Agency Public Protection Arrangements (MAPPA) exist in all areas of England and Wales, and place a duty on the police, the probation service and the prison authorities to assess and manage risks posed by offenders in every community, including churches. When an

offender is subject to a supervision plan (this will include all those on the Sex Offenders' Register) it is vital for churches to work closely with these agencies.

### **Sexual offenders**

There are accredited sex offender treatment programmes in many prisons as well as community-based services. Research shows that those who complete treatment are less likely to fantasise about children or deny they harmed their victims and are less likely to re-offend. Any help provided by the church must not be seen as a substitute for working with the statutory agencies.

Sexual offending can be extremely addictive. However repentant a sexual offender may appear, there are no cast-iron guarantees that they will not re-offend, even if they have undergone treatment. Many offenders initially refuse to admit that they have committed an offence and may continue to deny their guilt. Some offenders do not accept that their behaviour is wrong and believe it is perfectly acceptable to have sexual relationships with children.

It is imperative that sexual offenders are monitored closely and strict boundaries placed on their movements and behaviour within the church setting.

### **Alleged perpetrators who are not convicted**

Most people who offend against children are not convicted and cannot therefore be classed as 'offenders'. Where there are reasonable grounds for concern that a person poses a risk to children or adults who may be vulnerable, his/her involvement with a church will still need to be assessed for risk and managed, and appropriate boundaries may need to be applied. Support for the person needs to be offered in this context.

### **What the church can do**

The church's role must be to reinforce whatever is done by others to help perpetrators address their abusive behaviour. In some cases, this may involve actions by other agencies such as police responses or the provision of professional help. Perpetrators may also need help with alcohol or drug misuse, or mental health issues. The church should encourage the perpetrator to seek appropriate help.

In this context, it is still possible to help and support those who accept that what they have done is wrong and want to change. When they leave prison or court they may feel:

- worried about how people will react
- frightened in case the temptation to re-offend overcomes them
- frightened of victimisation and abuse if there has been press reporting of their offence
- guilty, ashamed, isolated and lonely.

Offenders or alleged perpetrators wanting to change, need people around them who will love and accept them, and offer them care and protection. When an abuser, and particularly a sex offender, is known, befriended and helped by a group of voluntary workers to lead a fulfilled life without direct contact with children or adults who may be vulnerable, the chances of re-offending are diminished, and the church thus has an important role in contributing to the prevention of further abusive behaviour. Members of a local

congregation may be able to help by combining rejection of the abusive behaviour with acceptance of the perpetrator as a person.

### **Forgiveness**

Many offenders may need an assurance that they are not rejected by God and will seek God's forgiveness for their crimes. Genuine and evidenced repentance implies that the person concerned will accept that further help is required to prevent a recurrence of the offence and to deal with the human and social effects of the abuse.

As well as professional therapy, this may require continuing supervision and discipline within the church as part of the ministry to the perpetrator. A perpetrator may need to accept that no further contact or work with children or young people and/or adults who may be vulnerable can be permitted, and that a continuing pastoral role may be impossible.

Those who are supporting the perpetrator need to:

- be aware of the many losses, such as of status, role or job, or family, which the perpetrator may be suffering and with which they may be coming to terms
- be aware of the risks of physical and verbal abuse to which the perpetrator may be subject
- be able to set and manage limits on the perpetrator's involvement in church
- challenge risky or wrong behaviour
- maintain confidentiality, but be able to inform statutory agencies or Diocesan officers if the perpetrator's behaviour gives cause for concern
- not allow themselves to be manipulated
- be a reliable support to help the offender maintain self-control.

In every situation a careful ongoing assessment needs to be made as to whether the church can safely and adequately work with the person.

Their role is **NOT**:

- to undertake work with a perpetrator to address their abusive behaviour. In-depth work with perpetrators is a specialist field and holds potential for danger. It should only be attempted by trained professionals
- in the case of domestic abuse, to engage in mediation or couples counselling. This is not an appropriate response to domestic abuse and can be very dangerous.

### **Organisations which can support churches**

Circles of Support and Accountability, managed and supported by the Lucy Faithfull Foundation, are small groups formed around sex offenders by voluntary workers from the community, which aim to balance the needs of the community for safety with those of the offender in being enabled to lead an offence-free life.

Circles aim to provide everyday practical support to the offender and to help them to develop in order to reintegrate into the community, for example by developing new hobbies, interests, social activities, friendships and relationships. Voluntary workers can provide mediation between the offender and statutory agencies and can also work alongside family members and any existing support networks he/she may have.

<https://www.lucyfaithfull.org.uk/circles-of-support.htm>

Stop It Now is also managed and supported by the Lucy Faithfull Foundation and is a sexual abuse prevention campaign and helpline available to:

- adults worried about the sexual behaviour of other adults or children and young people
- those worried about their own sexual thoughts or behaviour towards children, including those with concerns about their online behaviour
- friends and relatives of people arrested for sexual offending, including internet offending
- any other adult with a concern about child sexual abuse, including survivors and professionals. **Helpline:** 0808 1000 900. <https://www.stopitnow.org.uk>

The following theological resources are available from the Faith and Order Commission:

1. *The Gospel, Sexual Abuse and the Church*, 2016: <http://bit.ly/GospelAbuse>
2. *Forgiveness and reconciliation in the aftermath of abuse*, 2017: <http://bit.ly/CofEReconciliation>

### **Families of perpetrators**

Partners of perpetrators of abuse may be unaware of the offending behaviour right up until an arrest is made; this is particularly common for offences of downloading abusive images of children.

Partners and children of abusers may also find themselves victimised and blamed for the abusive behaviour by members of the public. In situations of domestic abuse, and of abuse of a child of the family, family breakdown may occur, and there may be restrictions on contact by the perpetrator of abuse with the children.

In all situations where a perpetrator is part of a family, the relationships between spouses and partners, and between parents and children, are put under great stress, and conflicting feelings may be unmanageable. The likely effects are isolation, loss of self-esteem and confidence, and possibly debt and loss of home.

Where families of perpetrators are part of church congregations, or seek to become so, they will need acceptance, love and care. They may also need time to be listened to while they come to terms with the abusive behaviour and in some situations make decisions about the future.

Members of the church may be able to support them in the following ways:

- find out if the partner and children have support, for example from extended family or friends they can talk to, or through counselling
- accompany and include them in parish activities. For example, offer to sit with them in church; invite and accompany them to church events; encourage them to join activities and participate in the life of the church be practical. For example, signpost to childcare, offer transport, help with shopping, signpost to youth activities
- commit long-term: whether or not a case goes to court, the process can take years; and what happens after the event is at least as important as at the time. So be prepared to commit for the long haul

- offer or signpost to specialist help, for example, solicitor, accountant, benefits or housing advice.

## **B12 Safer Recruitment**

At Christ Church we are committed to following best practice in carefully recruiting those who work with children, young people or adults at risk of harm, in a paid or voluntary role. The following steps will be taken before someone begins to serve:

### **Role description and advertising**

For employed posts, a job description and person specification will be produced, clearly setting out the responsibilities of the role and the skills/experience required. For voluntary posts, a Role Description is available. All job descriptions and role descriptions are to include this Safeguarding Statement:

*Christ Church Cockfosters is committed to safeguarding and promoting the welfare of children, young people & adults who may be at risk of harm. The PCC require all employees & volunteers to share this commitment & abide by our Safeguarding Policy.*

For volunteer roles, with the prior approval and direction of the appropriate Ministry Area Leader, young people who are aged 14+ can assist with children's work. Such volunteers contribute towards the number of children not the number of adults when it comes to required ratios.

### **Application**

An application form will be required for all posts working with children/vulnerable adults. All volunteers must have a face-to-face conversation with the Ministry Area Leader for which they are volunteering in order to go through the role description and to confirm their suitability for the role. The volunteer must also complete and sign the Diocesan Volunteer Agreement.

All volunteers must complete a Diocese of London confidential declaration form, requiring the honest declaration of any criminal convictions.

All volunteers must provide the names of 2 people to act as personal referees, which will be followed up. Referees must not be relatives/partners, current parish clergy, or church staff.

All volunteers must complete a Disclosure and Barring Service (DBS) form for the applicable Enhanced level Disclosure. Details of how to do so will be sent to the volunteers via email, from our Lead Recruiter (Glenda Hunter).

An individual who has committed an offence against a child/adult at risk or who, for any other reason is considered by the leadership as unsuitable to work with these groups, will NOT be appointed to such a role. Where a DBS check is returned with a 'blemish', a risk assessment will be carried out in conjunction with the diocese. A DBS check is required to be renewed every three years.

### **Appointment**

A volunteer can begin their role only when the following have been completed:

- The Diocese of London confidential declaration form has been filed as complete.

- The personal references have been sent for, received, and reviewed as being acceptable.
- The satisfactory DBS Disclosure outcome has been received from 31:8.
- They have completed online safeguarding training. Details of this will be sent by email or can be found here <https://safeguardingtraining.cofeportal.org/login/index.php>

### **Ongoing spiritual and personal accountability**

All Staff, Leaders and Volunteers are encouraged to be part of a life group or its equivalent, for their own encouragement and support. Staff members receive regular accountability/supervision sessions from the Senior Ministers.

The Ministry Area Leaders receive regular accountability/supervision from an appropriate member of the Staff team. They will take responsibility for pastoral oversight of the members of their team as they carry out their roles.

Workers with children and adults at risk of harm will be given opportunities to meet with a leader to discuss their work and areas of concern. During group team meetings, safeguarding will be a standing agenda item. Anyone who has concerns relating to safeguarding is always able to discuss them the CSO.

### **Training**

As a church we are committed to ongoing training in safeguarding. All volunteers working with children and vulnerable adults will be expected to attend training on an annual basis. This will incorporate the appropriate modules from the Church of England's National Safeguarding Training (Basic Awareness and Foundation levels) which will be completed every 3 years.

## **B13 Supervision of offenders and those who pose risk**

Section 7 of the *Practice Guidance: Responding to, Assessing and Managing Safeguarding Concerns or Allegations against Church Officers* (<http://bit.ly/CofEConcerns>, also known as 'Responding 17') includes detailed guidance on the risk assessment and management of those who may pose a known risk to children, young people or vulnerable adults within the congregation or community.

The introduction states:

*"The Church of England, based on the message of the gospel, opens its doors to all. This means that there are likely to be those with criminal convictions for sexual and/or violent offences and other forms of abuse, as well as others who may pose a risk, attending a church or as members of worshipping communities. Some of these individuals will pose an ongoing or potential risk of harm to other individuals who attend the church.*

*"The Church has a duty to minister to all, which imposes a particular responsibility to ensure that everyone who attends the church is safe. This includes not only victims/survivors of abuse offences but all individuals who come to church. This means that it will include those people who have convictions. All must be considered equally to ensure everyone is safe, no matter what their background.*

*“Where a known sexual/violent offender is not only monitored but befriended, helped and supported by a group of volunteers to lead a fulfilled life without direct contact with children, young people or vulnerable adults, the chances of re-offending are diminished. Indeed, there is no doubt that the church has an important role contributing to the prevention of future abuse.*

*“Where people have convictions which give rise to a safeguarding concern, their position in a congregation or community may need to be carefully and sensitively considered/assessed to decide whether they pose a risk to others and to put in place arrangements to ensure that these risks are mitigated. This may include people convicted of violent or sexual offences against children, young people and/or vulnerable adults. It may also include those convicted of offences linked to domestic violence/abuse and people involved in drug or alcohol addiction. In addition, there may be those who do not have convictions or cautions but where there are sound reasons for considering that they still might present a risk to others.”*

***In all circumstances where you are concerned that an adult or a child may pose a risk to children or adults who may be vulnerable, please contact the Diocesan Safeguarding Adviser (DSA) at the earliest possible stage and in any case within 24 hours, in order that an appropriate risk assessment can be carried out.***

### **Assessing risk for those known to have sexually abused children**

Anyone who has been found guilty of sexual offences against children since the Sex Offenders Act 1997 will be or will have been on the Sex Offenders’ Register, and therefore known to the police.

If you are informed by a statutory agency — this may be your local Police Public Protection Team (Jigsaw Teams within the Metropolitan Police Service) or Probation Service – that a known sexual offender or any person who may present a potential known risk to children, young people or vulnerable adults wishes to join your church, or is already a member of your church, then **contact the DSA as soon as possible, in any case within 24 hours**, and before you take any action.

This information may not come to you directly from a statutory agency, it may come from the person themselves or from someone who knows them.

In all these cases there needs to be a risk assessment and a plan to manage the risk. Once notified, the Diocesan Safeguarding Team (DST) wherever possible should obtain a copy of the statutory agency risk assessment and use this to draft the Ongoing Safeguarding Agreement and to manage the risk that the individual’s attendance at church presents. Where it is not possible to access a statutory agency’s risk assessment, a standard risk assessment should be completed by the DSA (see Section 5.3 of *Responding 17*) to assist in the drawing up of the Ongoing Safeguarding Agreement.

A meeting should be held with the subject, explaining the outcome of the risk assessment; what the recommendations are; the purpose of the Ongoing Safeguarding Agreement; and who will be involved at a local level to monitor and support the person concerned.



## **Assessing risk for those who pose risk but are not sexual offenders**

You may be concerned that someone who is not a sexual offender against children nevertheless may pose a risk, in circumstances such as the following:

- they have an offence for violent or sexual offences against adults
- an allegation of abuse against a child or adult has been investigated but the matter has not proceeded to court, or the person has been acquitted
- a person has demonstrated erratic behaviour which is actually or potentially violent or a risk to children or adults who may be vulnerable; this may be due to substance misuse, mental ill health or a disability
- a complaint or grievance has been received alleging inappropriate behaviour, which is not criminal.

In such circumstances, consult with the DSA, who may arrange for a risk assessment to be undertaken, and dependent upon the result of the risk assessment there may then need to be an Ongoing Safeguarding Agreement.

Assessment of risk of clergy or church officers is the responsibility of the Diocese, working in consultation with the parish. The DSA will set up the procedures for this, which are detailed in *Responding 17*. This will include the commissioning of a risk assessment by an assessor who in some circumstances may be independent from the Diocese.

## **Management and agreements**

### Ongoing Safeguarding Agreements

When it has been assessed that any person who wishes to become or remain a member of the congregation or church community may present a risk to a child, young person or vulnerable adult then there must be an appropriate plan to manage the identified risks using an Ongoing Safeguarding Agreement.

Ongoing Safeguarding Agreements are written by the DST in consultation with the person who poses risk and his/her supporter, Incumbent, Churchwarden(s), Church Safeguarding Officer (CSO) and other relevant parties (where applicable). This may also involve statutory agencies, if they are involved.

This is normally done through a meeting usually chaired and co-ordinated by the DST member, with the relevant people present.

### Purpose

An Ongoing Safeguarding Agreement is made primarily to reduce and minimise the risk to children and adults. The agreement also aims to create a safe environment for the person posing risk, through protecting them from false allegations and the risk of re-offending, supporting them and enabling them to receive appropriate ministry within explicit bounds of confidentiality.

### Who is involved

A reference group will be set up in the church, whose purpose will be to monitor the agreement, as well as to provide support to the person posing risk. This will normally be the Incumbent, the CSO, one or two of the Churchwardens and others depending on the

circumstances. There needs to be a sufficient number on the reference group to be able to robustly manage the Agreement but this needs to be balanced with the need for confidentiality and a need-to-know principle.

#### Ministry to the person posing risk

The Agreement will make it clear how the person who poses risk can receive ministry and support.

#### Monitoring and review

The Agreement must be dated and all members of the reference group and the person who poses risk must sign it to acknowledge that they agree to abide by its terms. The parties must also agree the time periods when the Ongoing Safeguarding Agreement can be reviewed.

#### Boundaries of involvement

The Agreement will set clear boundaries on the person's involvement in the church community, in order to minimise risk. Depending on the seriousness of the risk, limits may include:

- which services and/or groups the person may attend
- whether he/she should be accompanied, and if so, by whom
- where he/she may sit, in other words apart from children, young people and/or vulnerable adults
- what activities he/she may participate in, for example attend a house group only if there are no children, young people and/or vulnerable adults; stay away from areas of the building where children, young people and/or vulnerable adults meet; decline hospitality where children, young people and/or vulnerable adults are
- what roles he/she is disqualified from; these are likely to include all direct and unsupervised work with children and young people, and any official role or office in the church which gives him or her the status or authority deemed to be trustworthy
- other limits on his/her behaviour, and agreements about how his/her behaviour will be managed.

In circumstances where, for instance, the victim is also part of the church community, or the church is one with a large number of children, the person posing the risk may be introduced to a congregation in another parish.

#### Confidentiality

It must be made clear to the person who poses risk and all other parties to the Agreement that no one else apart from those identified in the Agreement will be informed of the facts without the respondent's knowledge. That said, the person must be advised that although the highest levels of confidentiality will be maintained, if there is a breach of the Agreement or a respondent refuses to comply with safeguarding arrangements it may be necessary to inform others to protect children, young people and/or vulnerable adults. It may also be the case that the statutory authorities involved will be kept updated periodically and certainly if there is a breach of the Agreement. In addition, if there is any

breach, the DSA must be consulted in order to decide what further safeguards need to be put in place and whether the person should continue as part of that congregation.

### Enforcement

The Agreement must be enforced and monitored, with no changes allowed outside of an agreed review process. It must remain in place for as long as the person is a part of the congregation.

The DSA maintains a database of Agreements in place in the Diocese, and ensures that such agreements are reviewed at least annually.

It should be remembered that it is not possible to prevent a parishioner from attending a service, which is open to the public, unless this is a condition included in a court order or in his/her licence conditions upon release from prison.

If the person who poses risk will not voluntarily agree not to attend certain services, it is possible for the Churchwardens to direct a person where to sit, put measures in place to closely supervise them (for example, accompany the individual) and remove that person if they cause a disturbance. These measures to minimise risk can be contained within the Agreement.

As stated, any ban from a service of worship which is incorporated in an Ongoing Safeguarding Agreement with a respondent is essentially voluntary if that respondent is a parishioner (if the person is not a parishioner he/she has no legal right to attend a parish church even on Sundays or Holy Days). This position relates to public worship only. Where a respondent parishioner refuses to comply with the terms of his/her Ongoing Safeguarding Agreement, other actions could be imposed, for example banning him/her from midweek activities, after-service coffee, or any other event which is not open to the public in the same way.

There may also be action that can be taken if individuals refuse to enter into or comply with such an Agreement where the person is subject to supervision by a statutory agency. For instance, information in relation to any failure to comply could be shared with the police or an individual's offender manager who will consider whether there has been a breach of any civil order. This should be made clear to the person, prior to the drafting of the Ongoing Safeguarding Agreement and/or if he/she refuses to comply.

The person should not accept any official role or office in the church which gives him or her status or authority; others may deem that person to be trustworthy. Some roles, for example that of Churchwarden, are disqualified to people with convictions for offences listed in Schedule 1 of the Children and Young Persons Act 1933 (broadly, violent, sexual or drug-related offences against children) and those who have been barred by the Disclosure and Barring Service (DBS) from working with children, young people and/or vulnerable adults (see the Churchwardens Measure 2001, section 2(1A) and 2(2)(a)).

# SECTION C: Recognising and responding to abuse

## C1 Recognising abuse in children, young people and vulnerable adults

Child abuse is serious. All volunteers need to know how to respond to signs of abuse or allegations of abuse. The following guidelines are in place to meet that need.

A "child" is a person under the age of 18.

*Working Together to Safeguard Children*<sup>1</sup> states that 'somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger.' It recognises four areas of potential abuse for children: physical, sexual, emotional and neglect. Abuse can be described under any one of these four categories or a combination of categories, and can be carried out by an adult or another child.

### Physical abuse

This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

### Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- Seeing or hearing the ill-treatment of another e.g. where there is domestic violence and abuse;
- Serious bullying, causing children frequently to feel frightened or in danger;
- Exploiting and corrupting children either for sexual favour, servitude or any other reason.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

One particular form of emotional abuse we need to be aware of in church is **spiritual abuse**. This refers to a systematic pattern of coercive and controlling behaviour in a religious context. It may involve threatening, manipulating or putting pressure on someone to behave in a certain way, enforced accountability or public humiliation. Such behaviour is very different to faithfully sharing the truths of the Bible with love, respect

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<sup>1</sup> Published by HM Government, 2013, quoted in Policy for safeguarding in the Diocese of London, 2015.

and sensitivity. We must work openly as a team to ensure that we steer well clear of any such behaviour (see 2 Corinthians 4:2).

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

- The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Sexual abuse includes non-contact activities, such as involving children in looking at (including online and with mobile phones) or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under section 5 of the Sexual Offences Act 2003. See also section 9 of this document for guidance on grooming.
- Child Sexual Exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, drugs, alcohol, gifts or in some cases simply affection) as a result of engaging in sexual activities. It can take many different forms from the seemingly 'consensual' relationship to serious organised crime involving gangs and groups. Exploitation is marked out by an imbalance of power in the relationship and involves varying degrees of coercion, intimidation and sexual bullying including cyberbullying and grooming. Some young people who are being sexually exploited do not show any external signs of this abuse and may not recognise it as abuse.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse, mental ill health or learning difficulties, or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected.

Once a child is born, neglect may involve a parent failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs.

Included in the four categories of child abuse and neglect above are a number of factors relating to the behaviour of parents and carers which have significant impact on children. These include domestic violence, parental mental health, or parental substance misuse.

## **Financial Abuse**

The Care Act 2014 describes 'financial abuse' as a type of abuse which includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused.

Financial abuse is type of abuse that can start subtle and is often hard to detect. It often involves or is associated with:

- Someone taking or misusing someone else's money or belongings for their own gain
- Harming, depriving or disadvantaging the victim
- Controlling someone's purchases or access to money
- Often associated with other forms of abuse
- Doesn't always involve a crime like theft or fraud

Financial abuse might look like:

- Borrowing money and not giving it back
- Stealing money or belongings
- Taking pension payments or other benefit away from someone
- Taking money as payment for coming to visit or spending time together
- Forcing someone to sell their home or assets without consent
- Tricking someone into bad investments
- Forcing someone to make changes in wills, property or inheritance

## **Adults at risk of harm**

In the case of adults (anyone over 18 years of age), The Care Act 2014 defines safeguarding as 'protecting an adult's right to live in safety, free from abuse and neglect'. It is about people and organisations working together to prevent and stop both the risks and experience of abuse and neglect. At the same time the wellbeing of the adult must be promoted including, where appropriate, having regard for their views, wishes, feelings and beliefs in deciding on any action.

Safeguarding duties apply to an adult who:

- Has needs of care and support (whether or not the local authority is meeting any of those needs).
- Is experiencing or is at risk of abuse and neglect.
- As a result of their care and support needs, is unable to protect themselves from the risk of experiencing abuse and neglect.

The *Making Safeguarding Personal* approach lists six key principles for safeguarding adults who may be at risk of harm:

- Empowerment: People being supported and encouraged to make their own decisions and give informed consent.
- Prevention: It is better to take action before harm occurs.
- Proportionality: The least intrusive response appropriate to the risk presented.
- Protection: Support and representation for those in greatest need.
- Partnership: Local solutions through local services working with their communities.
- Accountability: People clear about the role of those involved in their lives.

Signs of abuse and neglect in adults:

- Physical abuse: Including assaulting, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

- Domestic violence: Abuse between intimate partners or family members that includes psychological, physical, sexual, financial, emotional, 'honour'-based violence or forced marriage.
- Sexual abuse: including 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 adult has not consented or was pressured into consenting.
- Psychological abuse: including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks
- Financial or material abuse: including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance, financial transaction or the misuse or misappropriation of property, possessions or benefits.
- Modern slavery: encompasses slavery, human trafficking, forced labour and domestic servitude.
- Discriminatory abuse: harassment, slurs or similar treatment; because of race, gender or gender identity, age, disability, sexual orientation or religion.
- Organisational abuse: including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in one's own home.
- Neglect and acts of omission: including ignoring medical, emotional or physical care needs, failure to provide access to appropriate healthcare and support or educational services, the withholding of the necessities of life such as medication, nutrition or heating.
- Self-neglect: this covers a wide range of behaviours neglecting to care for one's personal hygiene, health or surroundings and includes behaviours such as hoarding.

## C2 Church of England policy on domestic abuse

(From *'Responding Well to Domestic Abuse: Policy and Practice Guidance'*, second edition 2017: <http://bit.ly/CoERespondingWell>)

The Church of England is committed to raising awareness about domestic abuse and its impact on individuals, children, the wider family and community.

It will work to ensure that:

- the safety of individuals suffering abuse or seeking help is the first priority, and that there is an awareness of the need for confidentiality within the bounds of good safeguarding practice
- teaching and worship reflect awareness-raising about domestic abuse, use appropriate language and say clearly that domestic abuse is wrong
- inappropriate behaviour is challenged. This needs to be done extremely carefully, in a way that does not place any individual including a victim at increased risk
- clergy and clergy spouses have the same access to support and resources as others who are experiencing domestic abuse. In addition, the Diocesan Bishop will appoint a Bishop's Visitor whose role is to support the clergy or clergy spouse at

the time of the breakdown of the relationship, and for as long as possible after, as required.

It is committed to all church bodies:

- adopting and publishing a local policy on domestic abuse, including whom to contact if there are concerns
- having clear procedures in place to respond to concerns about domestic abuse in line with *Responding Well to Domestic Abuse: Policy and Practice Guidance* and *Practice Guidance: Responding to, Assessing and Managing Safeguarding Concerns or Allegations against Church Officers*: <http://bit.ly/CofEConcerns>
- ensuring that signage is in place in local venues to demonstrate that a church or setting is willing to talk with everyone about domestic abuse and how to access support
- appointing a named individual who has responsibility for domestic abuse and violence and who is a point of contact for any advice and support. This may be the DSA, Parish Safeguarding Officer (PSO) or the nominated safeguarding lead
- training those in leadership positions, safeguarding roles and with pastoral roles on domestic abuse
- discussing domestic abuse and violence in appropriate contexts such as marriage preparation, youth groups, ordinand training and in church settings
- organising and promoting training and awareness-raising sessions
- working with statutory agencies and other support bodies; supporting and publicising their work.

Children can be affected by seeing, hearing and living with domestic violence and abuse as well as being caught up in any incidents directly, whether to protect someone or as a target. Recent studies have also found 16 and 17-year-olds to be increasingly affected by domestic violence in their peer relationships.

The Home Office definition of domestic violence and abuse was updated in March 2013 as:

*'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence and abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender and sexuality. This can encompass, but is not limited to, the following types of abuse:*

- *Psychological*
- *Physical*
- *Sexual*
- *Financial*
- *Emotional*

**Controlling behaviour** *is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape, and regulating their everyday behaviour.*

**Coercive behaviour** *is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.'*



**All forms of domestic abuse are wrong and must stop. We are committed to promoting and supporting environments which:**

- ensure that all people feel welcomed, respected and safe from abuse
- work to protect those experiencing domestic abuse from actual or potential harm
- recognise equality among people and within relationships
- refuse to condone any form of abuse
- enable and encourage concerns to be raised and responded to openly and consistently.

We recognise that:

- all forms of domestic abuse cause damage to the survivor and express an imbalance of power in the relationship
- all survivors (regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity) have the right to equal protection from all types of harm or abuse
- domestic abuse can occur in all communities
- domestic abuse may be a single incident, but is usually a systematic, repeated pattern which escalates in severity and frequency
- domestic abuse, if witnessed or overheard by a child, is a form of child abuse by the perpetrator of the abusive behaviour
- working in partnership with children, adults and other agencies is essential in promoting the welfare of any child or adult suffering abuse.

We will respond to domestic abuse by, in all our activities:

- valuing, listening to and respecting both survivors and alleged or known perpetrators of domestic abuse, whilst refusing to condone the perpetration or continuation of any form of abuse in our publicity:
- raising awareness about other agencies, support services, resources and expertise, through providing information in public areas of relevance to survivors, children and alleged or known perpetrators of domestic abuse when concerns are raised:
  - o ensuring that those who have experienced abuse can find safety and informed help
  - o working with the appropriate statutory bodies during an investigation into domestic abuse, including when allegations are made against a member of the church community in our care:
  - o ensuring that informed and appropriate pastoral care is offered to any child, young person or adult who has suffered abuse
  - o identifying and outlining the appropriate relationship of those with pastoral care responsibilities with both survivors and perpetrators of domestic abuse.

### **C3 Responding when a disclosure is being made**

In your work with children or vulnerable adults, they may disclose information relating to present or past abuse. During the conversation:

- Above all else: listen!

- Keep calm, and show acceptance of what the child says, however unlikely it seems
- Let them know you will need to tell someone else - don't promise confidentiality
- Be aware the child may have been threatened
- Never push for more information. If the child decides not to tell you after all, then accept that and let the child know that you are always ready to listen. Do not "investigate" further
- Avoid leading the child. Ask only what is necessary to ensure a clear understanding of what has been said (you might put something into their mind that was not there). If the case were to end up in court, the case could be thrown out if it is thought that the child had been led.

Helpful things you might say or convey:

- "I am glad you have told me"
- "It's not your fault"
- "I will help you"

Concluding:

- Reassure the child that they were right to tell you and that you believe them
- Let the child know what you are going to do next and that you will let them know what happens (you might have to consider referring to Social Services or the Police to prevent the child returning home if you consider them to be seriously at risk of further abuse)
- Make notes as soon as possible (preferably within one hour of the child talking to you, but always within 24 hours), writing down exactly what the child said and when they said it, what you said in reply and what was happening immediately beforehand (e.g. a description of the activity). Record dates and times, including when you made the record. Keep all hand-written notes even if subsequently typed. Such records should be kept for an indefinite period in a secure place. A copy of these notes must be passed onto the CSO.

## C4 Actions following a disclosure

After a disclosure of abuse, the following actions must be taken:

1. If a child/vulnerable person is in immediate danger or emergency medical attention is necessary then this should, of course, be sought immediately (e.g. calling 999).
2. Report all concerns to the Church Safeguarding Officer (CSO) as soon as possible. If the allegation is against the CSO, contact the Vicar.
3. If the CSO or Vicar are not contactable, advice can be sought from the Diocesan Safeguarding Team
4. At all stages in the reporting process, you retain the right to report serious matters directly to Social Services or the police. Even so, as soon as possible (and within 24 hours), you must also contact the CSO.
5. Under no circumstances should a church volunteer or employee investigate concerns of abuse themselves. Our responsibility is (in consultation with the Diocesan Safeguarding Team) to refer concerns to statutory authorities who will do the investigating required.
6. Apart from telling your CSO, this information must be treated as confidential. Do not inform/confront any alleged perpetrator under any circumstances.

7. You should also consider your own feelings and ask your Vicar, CSO or Ministry Area Leader for pastoral support if needed.

Even if you may feel the child's story is unlikely, this must not prevent the above action being taken. For example, a child may say that they have been abused by a younger person. In reality, the perpetrator could be a parent or a close relative, but naming another person may be the only way in which this child can seek help.

## **C5 Record-keeping, data protection and information sharing**

### **Opening a church safeguarding case file**

Good record-keeping is an important part of the safeguarding task. A record, called a case file, should be opened whenever a safeguarding concern or allegation occurs in a church. The record should include key contact details, dates of when the information became known and the nature of the concerns.

The record should include ongoing actions with dates, other key documents on the case file (for example, observation notes, reports, consent forms etc) and the case closure date. Records should use straightforward language and be concise and accurate so that they can be understood by anyone not familiar with the case. They should clearly differentiate between facts, opinion, judgements and hypothesis.

Safeguarding records are needed in order to:

- ensure that what happened and when it happened is recorded
- provide a history of events so that patterns can be identified
- record and justify the action(s) of advisers and church workers
- promote the exercise of accountability
- provide a basis of evidence for future safeguarding activity
- allow for continuity when there is a change of personnel.

### **Who should record**

Anyone who receives information, whether first- or second-hand, or takes any action, should keep their own record. Incumbents and/or CSOs may also keep a parish record.

### **How to record**

The following approach is helpful in considering what should be recorded.

- A written record of the event or conversation should be made as soon as practicable after the event or conversation but always within 24 hours. If brief notes are made at the time and then written up in detail later, again this should be as soon as practicable. The original notes must not be destroyed.
- Record the names of all key people including any actual/potential witnesses and include contact details.
- Keep your recording factual and an accurate account of what you have observed and what has been disclosed.
- When recording what potential victims/witnesses/alleged perpetrators have said to you or within your hearing use exact quotes where possible, and make this clear using quotation marks.

- When recording the circumstances of the concern or event, add the explanations offered by the people involved and make it clear who has given you that information.
- Record all your actions and decisions – for instance, with whom information was shared, from whom you took advice and any other action you took. If in doubt, record it.
- Record the date and time of all events, in other words when the concern arose and was made known to you or when you observed the concern or allegation, and all subsequent actions and decisions, including to whom and when you passed on the concern. Always sign each entry if a hard copy or make clear on an electrical record who has made that entry.
- Pass this record onto the CSO
- Record who knows about the information — for instance, the subject, their parents or carers, and other church leaders.
- Record what should happen next, for example what action will follow and who is going to do what. If there is subsequent action to take, make a note in a diary of the date by when this should happen.
- Include the views/perspective of the victim or vulnerable child or adult.
- If the person about whom you have made a record is unaware of the record's existence, make it clear in your recording why you have not told them.
- If it is necessary to record professional judgements and opinion, it must be clear that this is not fact and should be distinguished as such.
- All records must be respectful to the subjects and always bear in mind that they may be read by the subjects who have a right of access to their files.

### **Record retention and security**

The safeguarding case files, whether electronic or paper, must be stored securely by the Incumbent and CSO (via a folder on our server, where only the CSO and incumbent have access to it). This should include identifying who should have access to them. Records in relation to safeguarding issues, even if they have not been proven, should be maintained in accordance with the church's retention guidance. If the Incumbent moves from the church, the records should be passed to the new Incumbent.

In addition:

- no case work material should be stored on home computers or in home offices
- keep paper records in chronological order, and in a secure folder or file
- keep all electronic recorded information in password-protected or encrypted documents, with sole access to the author
- electronic files should be regularly backed up and systems virus-protected. Data must not be stored on external drives or removable media unless encrypted or password-protected
- safeguarding records should be seen only by those who need to have proper access to them
- sending information via e-mail is quick and easy but is open to the risk that someone other than the intended recipient can intercept it. Assume that it could be read by anyone. This will help to ensure that you take appropriate care both in the content of the e-mail and any attachments. Take care to check the address to which you are sending it

- e-mails containing safeguarding personal information should ideally be in an approved encrypted format, but if this is not available e-mail file attachments should always be protected by a password-protected method
- no letter containing confidential information and identifying details should be sent other than by special delivery. Always use the double envelope safeguard: the relevant information should be contained within an inner envelope marked confidential but no classification details shown on the outer envelope.

### **How long should records be kept?**

A safeguarding records retention fact sheet is available via the Church of England website: <http://bit.ly/RetentionRecruitmentRecords>. The fact sheet gives guidelines for the retention of safeguarding records in response to the Independent Inquiry into Child Sexual Abuse

The guidance outlines what type of records to keep and how long to keep them. Some of the retention periods in this guidance may differ from guidance previously issued. They reflect the changing requirements in the light of non-current abuse cases and plans are progressing to update and align them.

Records should be updated regularly to ensure that personal details are accurate and relevant.

### **Where should records be stored, and who should have access to them?**

- Sensitive personal data should never be left where others, who have no right to access it, may find it.
- Paper records should be kept in a locked cabinet or room with keys available only to those who have a legitimate need to access the information.
- Electronic records should be password-protected or encrypted.
- Personal details related to specific activities, for example registration forms for a youth club, should be available to leaders of the activities at all times that the activity is operating.
- All sensitive personal data about leaders, and sensitive personal data relating to allegations of abuse against members of the congregation, and concerns about specific children or young people, should be stored in a locked filing cabinet, with access limited to the CSO and the Incumbent.

### **Data protection and information sharing**

In May 2018, the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 replaced the Data Protection Act 1998. The GDPR contains the principles governing the use of personal data. It should be noted that the GDPR and the Data Protection Act 2018 place greater significance on organisations being accountable and transparent in relation to their use of personal data. Parishes handling personal data need to have the proper arrangements for collecting, storing and sharing information.<sup>2</sup>

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<sup>2</sup> More information for parishes about the new data protection regime can be found at <https://www.parishresources.org.uk/gdpr>

Personal information in relation to safeguarding will often be sensitive and is likely to be classed as what is called 'special categories of personal data' under the GDPR, which means extra care will need to be taken when handling such data. Nevertheless, it is important to be aware that the Data Protection Act 2018 includes specific reference to processing data in relation to the 'safeguarding of children and individuals at risk' and allows individuals to share, in certain situations, personal data without consent (see below).<sup>3</sup> "The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe" and this can equally be said to apply to vulnerable adults.<sup>4</sup>

### **Sharing without consent**

Information can be shared legally without consent if a person is unable to or cannot reasonably be expected to gain consent from the individual concerned; or if to gain consent could place somebody at risk. Relevant personal data can be shared lawfully without consent if it is to keep a child or vulnerable adult safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental or emotional well-being.

Never make these decisions on your own. If you are going to share personal data, this should always be discussed with the DSA. Of course, you may be able to share data, at least initially, without identifying the individual concerned both within the church and with the statutory services.

Ultimately, the most important consideration is whether the sharing of information is likely to support the safeguarding of a child, young person or vulnerable adult.

## **C6 Responding to a disclosure of historic abuse**

In the course of their work ministers and those offering pastoral support may hear disclosure from adults regarding abuse that happened to them when they were children, or from children regarding abuse that happened to them when they were younger. Historical abuse must be treated as seriously as recent abuse, and each individual must be treated with great pastoral sensitivity.

The Church is required to take advice from the Diocese and may need to report allegations or disclosures of criminal acts to the Police.

When someone tells you they have been abused, or have committed abuse, whether recently or many years ago:

- Listen to them
- Keep calm, and show understanding/acceptance of what is said, however unlikely it seems. Reassure the individual that they were right to tell you
- Never push for information. Avoid leading questions and ask only what is necessary to ensure a clear understanding of what has been said

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<sup>3</sup> There are also provisions that allow the sharing of personal data without consent for the prevention or detection of unlawful acts or to protect members of the public from dishonesty, malpractice or seriously improper conduct. However, you should always seek legal advice before relying on these provisions.

<sup>4</sup>Information sharing – advice for practitioners providing safeguarding services to children, young people, parents and carers': <http://bit.ly/InformationSharingSafeguarding> (July 2018)

- Let the individual know what you are going to do next and that you will keep them informed. Let them know that you will need to tell someone else - don't promise confidentiality
- Follow the same steps (as described previously) following a disclosure of abuse