



CO-MISSION CHURCHES TRUST

# CO-MISSION CHURCHES TRUST SAFEGUARDING POLICY

*(V4 February 2024)*

# 1 CONTENTS

1 Contents.....	2
2 Context.....	4
2.1 The Co-Mission Churches Trust.....	4
2.2 The Policy.....	5
3 Glossary.....	7
4 Biblical Mandate for Safeguarding.....	8
5 Safeguarding Responsibilities.....	9
5.1 Trustees.....	9
5.2 Safeguarding Coordinator.....	9
5.3 Deputy Safeguarding Coordinator.....	9
5.4 Lead Recruiter.....	9
5.5 Safer Recruitment Administrators.....	10
5.6 Complaints.....	10
6 Responding to and Reporting Safeguarding Concerns and Disclosures.....	11
6.1 Managing Immediate Risk.....	11
6.2 Reporting Concerns to the Coordinator.....	11
6.3 Managing the Risk: the Role of the Coordinator.....	11
7 Safer Recruitment Process.....	15
7.1 Management of our Safer Recruitment Process.....	15
7.2 Outline of our Safer Recruitment Process.....	15
7.3 Which Workers Will Be Required to Complete the Safer Recruitment Process?.....	17
7.4 Repeat Checks/ Renewals.....	19
8 Management of Past Offenders or Those Who Pose a Risk to Others.....	20
8.1 Supporting Those Affected by Abuse.....	20
8.2 Our Duties in Respect of Those Who Pose a Risk.....	20
8.3 Working With Those Who Pose a Risk.....	20
8.4 Contract of Care Team.....	22
9 Dealing with Allegations Against our Workers.....	23
9.1 Responsibility.....	23
9.2 Summary of Procedures.....	23
9.3 External Reporting and Liaison.....	24
9.4 Dealing with a Worker who Faces Allegations.....	26
Appendix 1: Key Contacts.....	27
A1.1 Contact Details for Statutory Services for Children.....	28
A1.2 Local Authority Safeguarding Adults Teams (L.A.D.O).....	29
Appendix 2: Legal Framework for Policies and Procedures.....	30
Appendix 3: Safeguarding Statement.....	31

Appendix 4: Relevant Groups in our Churches .....	32
A4.1 Children’s / Youth Ministries .....	32
A4.2 Other Ministries Covered by the Policy.....	34
Appendix 5: Safeguarding Adults at Risk.....	35
A5.1 The Care Act 2014 .....	35
A5.2 Definition of “Adult at Risk” .....	35
A5.3 Definition of Abuse .....	35
A5.4 Examples of Adults at Risk.....	35
A5.5 The Categories of Abuse in Adults (and Key Indicators) .....	36
A5.6 Other Forms of Adult Abuse.....	41
A5.7 How to Respond to an Adult Wanting to Talk About Abuse or Concerns of Abuse .....	42
A5.8 How to Deal With a Disclosure from an Adult .....	43
A5.9 Procedures Where There Is Concern For An Adult At Risk .....	44
Appendix 6: Safeguarding Children and Young People.....	45
A6.1 Definition of a Child .....	45
A6.2 The Four Categories of Statutory Child Abuse.....	45
A6.3 Children Who May Be Particularly Vulnerable To Abuse .....	46
A6.4 Harm Outside the Home.....	47
A6.5 Recognising Signs of Child Abuse.....	50
A6.6 How to Respond to a Child Wanting to Talk About Abuse .....	51
A6.7 Visitors and visiting speakers .....	53
A6.8 Missing children.....	53
Appendix 7: Gender Identity .....	55
A7.1 Summary of the Main Issues for Children and Young People .....	55
A7.2 Practical Issues.....	55
A7.3 Pastoral Issues.....	56
A7.4 Safeguarding Matters to Keep in Mind Regarding Gender Identity .....	56
Appendix 8: Safe Practice Code of Conduct for Work with Children and Young People .....	57
A8.1 Supervision of Children’s Activities .....	57
A8.2 Managing Toileting within Pre-School Sunday School Classes.....	58
A8.3 Behaviour Management: General Principles for Sunday School Teachers.....	59
A8.4 Youth 1:1 Mentoring and Communications Policy .....	61
Appendix 9: Safe Practice Code of Conduct for Work with Adults.....	65
Appendix 10: Safeguarding Incident/ Concern Form .....	66

*This policy has been developed by The Co-Mission Churches Trust in conjunction with Christian Safeguarding Services - and must not be reproduced by other churches/organisations without the written agreement of both The Co-Mission Churches Trust and Christian Safeguarding Services.*

## 2 CONTEXT

### 2.1 THE CO-MISSION CHURCHES TRUST

#### 2.1.1 THE CHARITY

The Co-Mission Churches Trust (**the Charity**) is a limited company, number 7496944, and is a charity registered with the Charity Commission of England and Wales under Charity number 1139922 and whose registered address is at 577 Kingston Road, London SW20 8SA.

**The Charity** seeks to advance the Christian faith through a number of local churches (**the Churches**). As **the Churches** serve their local communities by providing wide-ranging ministries involving children, young people, and adults of all ages, **the Charity** treats safeguarding as an urgent priority.

#### 2.1.2 THE TRUSTEES

The **Trustees** of **the Charity** are currently:

Philip Cooper	attends Cornerstone Church Kingston
Gregor Ferguson	attends Hope Church Sutton
John Marland	attends Dundonald Church
Robert Turner	attends Christ Church at All Saints Wandsworth
Rosie Dunn	attends Dundonald Church

#### 2.1.3 OUR CHURCHES

**The Charity's** churches (**the Churches**) are currently:

CONGREGATION NAME	LOCATION	MINISTER IN CHARGE
Boathouse Church	Putney	David Lee
Christ Church Balham	Balham (Lambeth)	Andrew Palmer
Christ Church at All Saints Wandsworth	Wandsworth	Andy O'Brien
Cornerstone Church	Kingston	Pete Woodcock
Dundonald Church	Raynes Park	Richard Coekin
Grace Church Worcester Park	Worcester Park	Sam Williamson
Hope Church Sutton	Sutton	Tim Saunders
Kings Church Walton	Walton (Elmbridge)	Simon Martin

## 2.1.4 OUR INSURERS

The Charity has a Faith Combined Insurance policy (no. 011231) with QUnderwriting. This policy has been arranged for us by Kingdom Bank.

See *Appendix 1* for key contact details.

## 2.2 THE POLICY

This Safeguarding Policy (the Policy) was last revised in January 2024 and will be reviewed annually. The Policy is the responsibility of the **Trustees** and is managed by our **Safeguarding Coordinator**.

### 2.2.1 PURPOSE

The Policy with its appendices outlines how we will:

- Ensure that we provide a healthy, nurturing and protective environment for everyone who comes into contact with **the Charity**
- Ensure that every member of **the Charity** is protected from harm and abuse and that if abuse is identified, it is handled effectively, promptly, and proportionately
- Ensure that our trustees, staff, and volunteers are clear about their responsibilities and duties and are supported to competently and confidently fulfil them
- Support the development of an open and transparent culture that listens to the views and wishes of every member of **the Charity** and supports the raising of concerns and complaints
- Provide leadership and accountability for every member of **the Charity** in relation to safeguarding.

### 2.2.2 SCOPE

The Policy applies to everyone who works on behalf of **the Charity** including **the Charity's** trustees, senior leaders, group/ministry leaders, paid staff, volunteers, and others working on our behalf.

**Charity Commission guidance** shows how wide the scope of safeguarding is for charities:

“Protecting people and safeguarding responsibilities should be a governance priority for all charities. It is a fundamental part of operating as a charity for the public benefit. As part of fulfilling your trustee duties, whether working online or in person, **you must take reasonable steps to protect from harm people who come into contact with your charity.**”

This includes:

- people who benefit from your charity's work
- staff
- volunteers
- other people who come into contact with your charity through its work

The Charity Commission will hold trustees to account if things go wrong and will check that trustees followed this guidance and the law. Trustees are expected to take responsibility for putting things right.

The Commission will refer concerns to relevant safeguarding agencies where needed to take further action as it is not a nominated body with the power to implement safeguarding legislation.

Trustees should promote an open and positive culture and ensure all involved feel able to report concerns, confident that they will be heard and responded to.

We expect all trustees to make sure their charity:

- has appropriate policies and procedures in place, which are followed by all trustees, volunteers and beneficiaries
- checks that people are suitable to act in their roles
- knows how to spot and handle concerns in a full and open manner
- has a clear system of referring or reporting to relevant agencies as soon as concerns are suspected or identified
- sets out risks and how they will be managed in a risk register which is regularly reviewed
- follows statutory guidance, good practice guidance and legislation relevant to their charity: this guidance links to the main sources of information
- is quick to respond to concerns and carry out appropriate investigations
- does not ignore harm or downplays failures
- has a balanced trustee board and does not let one trustee dominate its work – trustees should work together
- makes sure protecting people from harm is central to its culture
- has enough resources, including trained staff/volunteers/trustees for safeguarding and protecting people
- conducts periodic reviews of safeguarding policies, procedures and practice”

(<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>)

## 2.2.3 BASIS OF POLICY AND LEGAL FRAMEWORK

This policy is consistent with:

- current legislation
- national guidance
- local arrangements
- our charitable objectives, governing documents and doctrinal statements

*Further details are provided in **Appendix 2** to this Policy.*

## 2.2.4 POLICY HISTORY

Version 2	March 2022 after full review and update
Version 3	November 2022, after minor review and revision to reflect latest guidance and appointment of a Deputy Safeguarding Coordinator
This Version 4	February 2024, only minor updates to reflect latest guidance
Next review due	February 2025

A copy of the Policy is held at **the Charity's** offices at 577 Kingston Road, London SW20 8SA. Everyone working with children and young people or adults at risk shall have an electronic copy of the Safeguarding Policy made available to them. We are committed to a rolling training programme for all such workers on the content of this Policy. Training is provided either by the **Coordinator** or by external specialists.

### 3 GLOSSARY

Throughout the Policy, we commonly refer to the following:

“The Charity” or “We”	means The Co-Mission Churches Trust
“Churches” or “our Churches”	means the local churches resourced by the Charity and whose ministries and activities are the responsibility of the Charity (see 2.1.3)
“Coordinator”	means the Safeguarding Coordinator appointed by the Trustees (see 5.2)
“CSS”	means Christian Safeguarding Services, an external advisory organisation ( <a href="https://thecss.co.uk/">https://thecss.co.uk/</a> )
“DBS”	means the Disclosure and Barring Service which helps to prevent unsuitable people from working with vulnerable groups ( <a href="https://www.gov.uk/government/organisations/disclosure-and-barring-service">https://www.gov.uk/government/organisations/disclosure-and-barring-service</a> )
“DBS check”	means the criminal records check carried out by the DBS that results in DBS certificates being issued to an individual
“Deputy Coordinator”	means the Deputy Safeguarding Coordinator appointed by the Trustees (see 5.3 below)
“Regulated Activity”	the term used to describe specified job functions carried out by an employee/volunteer as defined by the DBS. These activities are broken down into two groups, ‘Activity with children’ and ‘Activity with adults’
“Safer Recruitment Administrators”	means the individuals appointed by our Churches to help them to comply with the Safer Recruitment Process outlined in this Policy (see 5.4 below)
“Safer Recruitment Process”	means the process that we have put in place to minimise the risk of unsuitable people being approved to work with vulnerable groups within our Churches
“Trustees”	means the trustees from time to time of The Co-Mission Churches Trust (see 2.1.2)
“Young Helpers”	means those who help with children’s ministry at one of <b>our Churches</b> who are under the age of 18 years but are in Year 9 or above at school (see 7.3.5)

## 4 BIBLICAL MANDATE FOR SAFEGUARDING

In His Word, God has made it very plain that the welfare of children, young people and adults at risk is of great importance to Him.

Our approach to safeguarding is shaped by our belief as Christians that:

- We are to honour those that God has set in authority over us and to live as responsible and good citizens in the time and place that God has set us in. Therefore, we must willingly submit to, and comply with, the legal requirements relating to safeguarding
- Every human life, including that of the unborn, is valuable to God and each person bears His image
- We live in a fallen and sinful world, where there are many risks and dangers and we must seek to protect everyone, but particularly the vulnerable in our midst, from those dangers. Protecting people does not mean covering-up wrongdoing and we recognise that doing so would be dishonouring to God, may be unlawful and may lead to further harm
- God cares for the widow, the orphan, and the stranger; He calls us to protect and care for those who are vulnerable in our society and to oppose exploitation
- Jesus' example was one of valuing, accepting and caring about everyone
- We are to love those around us as God loves them and to seek to bring healing, restoration and reconciliation to broken and damaged lives by the manifestation of the love of God through us
- The church is not a gathering of sinless and perfect people, but rather a community of grace where we seek to encourage one another to grow in faith and obedience to God
- We are called to encourage and challenge each other lovingly and to spur one another on to greater holiness and obedience to God in an attitude of humility, grace and forgiveness



# 5 SAFEGUARDING RESPONSIBILITIES

For contact details, see *Appendix 1*

## 5.1 TRUSTEES

The **Trustees** have ultimate responsibility for safeguarding on behalf of **the Charity**. The Charity Commission has provided detailed guidance on these responsibilities and a summary is shown above at 2.2.2.

## 5.2 SAFEGUARDING COORDINATOR

The **Trustees** have appointed Kristine Dryden to be **the Charity's** Safeguarding Coordinator ("the **Coordinator**") to help them to fulfil their safeguarding obligations. Within **the Charity**, the **Coordinator's** line manager is the Director of Charity Services (Stephen Hatherall).

Where there are any safeguarding concerns and/or allegations, the **Coordinator** is responsible for collating and clarifying the precise details of the allegation or suspicion and, if appropriate, for passing this information on to the statutory agencies who have a legal duty to investigate.

Under the authority of the **Trustees**, the **Coordinator** will also work to

- act as advocate for children, young people and adults at risk
- ensure the Policy is followed
- provide training and offer advice across all **our Churches**
- partner with statutory agencies as appropriate
- ensure the Policy is regularly reviewed and updated
- advise the **Trustees** and **our Churches** on issues of good practice
- ensure that, across **our Churches**, appropriate pastoral care is provided to all those who have been affected by recent or non-recent abuse
- ensure that each of **our Churches** prominently displays our *Safeguarding Statement* (see **Appendix 3**) within their buildings, service venues and on their church websites.

## 5.3 DEPUTY SAFEGUARDING COORDINATOR

The Trustees have appointed Rachel Allord to be the Charity's Deputy Safeguarding Coordinator ("the **Deputy Coordinator**") to help the **Coordinator** on a part-time, flexible basis. The **Deputy Coordinator** will be fully trained as a safeguarding lead and will provide cover for when the **Coordinator** is unavailable.

## 5.4 LEAD RECRUITER

The **Coordinator** will also act as **the Charity's** Lead Recruiter and is responsible for dealing with and processing applications for posts where **DBS checks** are required. The Lead Recruiter will maintain a 'Single Central Record' for **the Charity** of all those who have **DBS** clearances, and of all safeguarding training received by individuals across **the Churches**.

## 5.5 SAFER RECRUITMENT ADMINISTRATORS

The **Coordinator** will ensure that each of **the Churches** appoints one or more **Safer Recruitment Administrator** to carry out the following responsibilities:

- To regularly provide the **Coordinator** with details of ministries and activities that involve children and adults at risk run by their Church and the name of the person who is responsible for each one.
- To register with **CSS** as a Recruiter for their Church and to check and submit **DBS** forms for their church.
- To complete, with the support of the **Coordinator**, the steps outlined below in *section 7.2* of this Policy (the **Safer Recruitment** Process) for all relevant workers within their church.
- To ensure that all those within their church who need a **DBS check** obtain the required disclosure certificate(s) and receive appropriate training on the Policy and safe practice.

## 5.6 COMPLAINTS

*If you wish to make an allegation against one of our workers, please see section 9.2 below.*

The Charity distinguishes between two different types of complaints: safeguarding complaints and non-safeguarding complaints. However, we are aware that this distinction is not always clear and our staff and **Trustees** will take all complaints seriously.

### 5.6.1 SAFEGUARDING COMPLAINTS

Any complaints regarding the handling of safeguarding matters should be sent either by special delivery (registered mail) to:

**The Safeguarding Coordinator**  
Co-Mission Churches Trust  
577 Kingston Road  
London  
SW20 8SA

Or by email to:

[safeguarding@co-mission.org](mailto:safeguarding@co-mission.org)

Alternatively, complaints may be sent by mail to the **Trustees** at the above address or by email to: [cmct-trustees@co-mission.org](mailto:cmct-trustees@co-mission.org)

### 5.6.2 COMPLAINTS RELATING TO OTHER MATTERS

Other (unrelated to safeguarding) complaints or concerns should be reported using **the Charity's** separate complaints procedure, details of which should be requested from the Director of Charity Services, by emailing [stephen.hatherall@co-mission.org](mailto:stephen.hatherall@co-mission.org)

### 5.6.3 PROCESS

Complaints will be dealt with within a reasonable time period and the complainant will receive a written response to their complaint from either the **Coordinator** and/or the **Trustees**.

# 6 RESPONDING TO AND REPORTING SAFEGUARDING CONCERNS AND DISCLOSURES

(See **flowcharts** below on pages 13 and 14)

## 6.1 MANAGING IMMEDIATE RISK

Upon identification of a concern or receipt of a disclosure, the worker involved should make an assessment as to whether any immediate action is necessary to protect the individual. The worker may seek advice from their team leader or from the **Coordinator** or the **Deputy Coordinator**, however, the seeking of advice should not unnecessarily delay, or prevent the protective action, or place the individual at risk of further or increased harm.

In such urgent situations, and neither the **Coordinator** nor the **Deputy Coordinator** can be immediately contacted, the worker should contact either the police on 999 or children's social care (*see contact details in **Appendix 1***) to obtain support. Under such circumstances, the **Coordinator** or **Deputy Coordinator** should be notified at the earliest possible opportunity.

The **Coordinator** or **Deputy Coordinator** will notify the **Trustees** where they believe the matter may amount to a **Serious Incident** (see **section 9.3.3** below). The **Trustees** may also need to inform the **Charity's** insurers and/or the Charity Commission. In such circumstances, the **Coordinator** and/or the Director of Charity Services will notify the **Trustees** and it will be the decision of the **Trustees** as to whether or not the report is made to the insurers or to the Charity Commission.

## 6.2 REPORTING CONCERNS TO THE COORDINATOR

Once it has been established that the individual is not, or is no longer, in imminent danger, the concern must be reported as a matter of urgency to the **Coordinator** or, where she is unavailable, to the **Deputy Coordinator** (by phone call or by email).

Workers may wish to file the report using our webform ([co-mission.org/make-safeguarding-report](http://co-mission.org/make-safeguarding-report)) or by using the **Incidents and Concerns Reporting Form** (*see **Appendix 10***) and any notes taken should be passed on accordingly.

## 6.3 MANAGING THE RISK: THE ROLE OF THE COORDINATOR

*In respect of the following, where the **Coordinator** is unavailable, the **Deputy Coordinator** will fulfil these responsibilities and actions in place of the **Coordinator**.*

1. In discussion with the worker reporting the concern, the **Coordinator** will review any immediate actions taken and will be responsible for a follow-up or further actions that may be required.
2. Upon receipt of the completed **Incidents and Concerns Reporting Form** (webform or paper version) or any other form of communication, the **Coordinator** will establish a Confidential File in relation to the person at risk, and:
  - a. A chronology will be established and inserted at the front of the Confidential File;
  - b. The Confidential File will be updated with any further discussion or actions, including any advice sought or referrals made and updating will continue on an ongoing basis;

- c. The **Coordinator** will confirm to the person raising the concern that the matter has been actioned. The **Coordinator** will not provide any unnecessary information and information will only be shared on a 'need to know' basis.
3. Where the concern appears to meet the statutory threshold, the **Coordinator** will notify the parent or the carer (subject to para (a) below) of the individual concerned, or the individual if they are an adult, that a referral is being made to social care.
  - a. **Information will not be shared with the parent/carer in situations where:**
    - i. to do so would place a child at increased risk of harm or neglect
    - ii. to do so would place an adult at increased risk of harm or abuse
    - iii. the concern relates to fabricated or induced illness
  - b. The referral will be made to the appropriate Social Care service (*see Appendix 1 for contact details*)
  - c. If the referral has not been acknowledged within 3 working days, the **Coordinator** will follow up with Children's Social Care
  - d. The **Coordinator** will work with the Local Authority and other partners on behalf of **the Charity** to ensure that we fully participate in the safeguarding process.
  - e. All conversations, correspondence, and documentation will be placed into the Confidential File and the 'Record of Action' and chronology will be maintained on an ongoing basis.
4. Confidential Files will be stored securely in the **Charity's** office.
5. The **Coordinator** will share information as necessary with the **Trustees**, other individuals within the **Charity**, and where appropriate, the relevant church, in order to facilitate effective safeguarding.
6. At all times, the **Coordinator** and **Trustees** will make the appropriate pastoral care of victims their primary concern, whether abuse is recent or non-recent.

It is the right of any individual to make a direct referral to the Police or to other statutory agencies or to seek advice from **CSS**, although we hope that members of the **Churches** will use the procedure outlined in this Policy. If an individual believes that the **Coordinator** has not responded appropriately, they are entitled to contact an outside agency directly and/or contact the **Trustees**.

# REPORT CONCERNING AN ADULT AT RISK

## WHERE THERE IS NO EMERGENCY

You (whether a volunteer or staff) should:

1. Write down the conversation as accurately as possible. You may wish to use our Safeguarding Incident/Concern form (Appendix 10)
2. Contact the Safeguarding Coordinator within 24 hours (phone/email/in person)
3. Save and forward any/all records to the Safeguarding Coordinator
4. Never approach the alleged abuser
5. Consider your own feelings, seek pastoral support if needed. (See 6.2 and Appendix 5)

## WHERE THERE IS AN EMERGENCY

And you (whether a volunteer or staff) are concerned for an adult's immediate well-being/safety, you should:

1. Contact the Police or Adult Safeguarding Board (Emergency Duty Team out of office hours – see Appendix 1 for contact details); AND
2. Contact the Safeguarding Coordinator

The Safeguarding Coordinator will then consider whether the adult has care and support needs that warrant an immediate official referral. Where that is unclear, she will seek advice from either the Adult Safeguarding Board or from Christian Safeguarding Services.

No immediate referral is required and the adult appears to have sufficient mental capacity.

An immediate referral is required and the adult does not appear to have sufficient mental capacity.

The Safeguarding Coordinator will:

1. Discuss the concerns with the individual and support them to contact Adult Social Services for further support (Section 6) ; and
2. Consider if the church needs to develop a strategy/seek advice to address the concerns
3. Support the adult to contact the Adult Safeguarding Board or police (with their consent) if required.

The Safeguarding Coordinator will:

Contact the Adult Safeguarding Board and/or the Police; and follow up with a written referral within 48 hours.

The Safeguarding Coordinator will then:

1. Create a Confidential File and a 'Record of Action' and Chronology including all notes, correspondence and documentation. (Section 6.3)
2. Work with the Local Authority and other partners on behalf of the Charity to ensure that we fully participate in the safeguarding process.
3. Inform, as necessary, other individuals within the Charity, the Trustees and the relevant church to facilitate effective safeguarding (Section 6.3)
4. Continue to observe and review concerns where possible, ensuring that accurate records have been maintained, and reactivate the process where concerns remain
5. If the alleged abuser is a worker for the Charity, follow the procedures set out in Section 9.

## REPORT OF A CHILD BEING ABUSED OR AT RISK OF BEING ABUSED

### WHERE THERE IS NO EMERGENCY

You (whether a volunteer or staff) should:

1. Write down the conversation as accurately as possible. You may wish to use our Safeguarding Incident/Concern form (Appendix 10)
2. Contact the Safeguarding Coordinator within 24 hours (phone/email/in person)
3. Save and forward any/all records to the Safeguarding Coordinator
4. Never approach the alleged abuser
5. Consider your own feelings, seek pastoral support if needed. (See 6.2 and Appendix 6)

### WHERE THERE IS AN EMERGENCY

And you (whether a volunteer or staff) are concerned for a child's immediate well-being/safety, you should:

1. Contact the Police or local MASH team (child services out of hours- see Appendix 1 for contact details); AND
2. Contact the Safeguarding Coordinator

On receipt of any report or concern, the Safeguarding Coordinator will then consider whether the child is or isn't at risk of significant harm.

The child does not appear to be at risk of significant harm.

The child does appear to be at risk of significant harm.

The Safeguarding Coordinator will consider the various support options available (e.g. counselling, health visitor, children's services and child and adolescent mental health services) and take reasonable efforts to help the child / family access them, as appropriate.

The Safeguarding Coordinator will contact the local MASH team to make a referral. The initial phone call will be followed up with a written confirmation within 48 hours.

The Safeguarding Coordinator will then:

1. Create a Confidential File and a 'Record of Action' and Chronology including all notes, correspondence and documentation. (Section 6.3)
2. Work with the Local Authority and other partners on behalf of the Charity to ensure that we fully participate in the safeguarding process.
3. Inform, as necessary, other individuals within the Charity, the Trustees and the relevant church to facilitate effective safeguarding (Section 6.3)
4. Continue to observe and review concerns where possible, ensuring that accurate records have been maintained, and reactivate the process where concerns remain
5. If the alleged abuser is a worker for the Charity, follow the procedures set out in Section 9.

## 7 SAFER RECRUITMENT PROCESS

Our **Safer Recruitment Process** has been introduced to minimise the risk of unsuitable people being approved to work with vulnerable groups within **our Churches**. Subject to any exceptions specified below, until this process has been completed in respect of a person, and a satisfactory **DBS** certificate has been issued to that person, he or she will not be allowed to serve in any **Regulated Activity** role with either children or adults at risk.

In addition, and, unless there are clear and justifiable reasons, we require that any person working with any group involving children must be an active member of one of **our Churches'** small groups (e.g. home group, growth group or Knowing God group). The **Trustees** consider this to be important because such workers should be relationally connected within their church family and be subject to meaningful spiritual and personal accountability within their church.

### 7.1 MANAGEMENT OF OUR SAFER RECRUITMENT PROCESS

The **Coordinator** will manage and oversee our **Safer Recruitment Process**. This includes maintaining a 'single central record' of recruitment checks and a training log. **The Charity** utilises online recruitment documents and these are confidential and encrypted and are safely stored on an indefinite basis by the **Coordinator**. Only the **Coordinator** and the relevant **Safer Recruitment Administrator** can view the confidential online recruitment forms.

### 7.2 OUTLINE OF OUR SAFER RECRUITMENT PROCESS

The **Coordinator** will oversee and monitor the **Safer Recruitment Process** and liaise with the appropriate **Safer Recruitment Administrator** in respect of each worker until the process has been completed.

Where a person ("the Applicant") wishes to serve in a role or roles which are specified below in *section 7.3* at one of **our Churches** as either a paid employee or as a volunteer, we will carry out the following process in respect of the Applicant:

1. The **Safer Recruitment Administrator** or the rota leader will speak to the Applicant (who must be 18 years or older) about what the role entails, confirm their small-group involvement and explain the importance of safeguarding. The **Safer Recruitment Administrator** will provide the Applicant with a job description, briefly explain our **Safer Recruitment Process** and the Applicant will be provided with the web links they need in order to begin that process. If for a legitimate reason (work, distance from church to home, etc.) it is not possible for the Applicant to be an active member of a small group within their church, they must have written approval from their pastor. This must be obtained by the **Safer Recruitment Administrator** and be submitted to the **Coordinator** before the Applicant is allowed to serve.
2. The Applicant will submit an online Application form and give us their consent to proceed with a **DBS check** in their name.
3. The Applicant will submit an online Self-Declaration form and be encouraged to provide details of any criminal record and/or other reasons which may make them unsuitable to work with either children or adults at risk.
4. The **Safer Recruitment Administrator** will contact the Applicant's two referees (who must not be family members) and submit the Online Reference form. If either referee has any concerns, the **Safer Recruitment Administrator** will note them electronically or in writing and report them to the **Coordinator**.
5. The **Safer Recruitment Administrator** will initiate an electronic **DBS application** on the **CSS** ebulk system for the Applicant and once the Applicant has filled in their personal details the **Coordinator** will be notified and will in turn notify the **Safer Recruitment Administrator** to

complete their part of the application. Where the Applicant already has a **DBS** certificate that is on the **DBS Update Service**, which was received in a different context, the **Coordinator** is required to see the original paper certificate in order to verify the certificate is “acceptable” in accordance with the latest guidance from the **DBS**.

6. The Applicant will sign and submit the online Code of Conduct for working with Children (**Appendix 8**) and/or the online Code of Conduct for working with Adults at Risk (**Appendix 9**) as appropriate.
7. If the **DBS check** is completed and the **DBS** notify the **Coordinator** that their checks have come back “clean”, then:
  - a. The **Coordinator** will record the details of the **DBS** certificate which has been granted;
  - b. The **Coordinator** will notify the **Safer Recruitment Administrator** that the Applicant may now serve in the agreed **Regulated Activity** role.
  - c. The **Coordinator** will invite the Applicant to attend a safeguarding training session as soon as possible. Whilst the Applicant will be able to start serving on the agreed rota from this time forward, they will be required to attend a training session within six months. If the Applicant does not attend the training within 6 months, they will be required to temporarily stop serving in their **Regulated Activity** role until they have been able to attend the training. All workers are required to attend the **Charity's** Safeguarding Training in order to ensure knowledge and understanding of the **Policy** and processes specific to the **Charity** and **our Churches**.
  - d. The **Coordinator** will request that the Applicant sign-up to the **DBS Update Service** within 30 days of the **DBS** being issued.
8. However, if the **DBS check** is completed and the **DBS** notify the **Coordinator** that their checks have come back “blemished”, then the **Coordinator** will invite the Applicant to a meeting and will ask them to bring their original **DBS** certificate and to explain what is noted there. The **Coordinator** may subsequently need to carry out further enquiries and/or seek additional advice and will conduct a written risk assessment which will be retained indefinitely in a secure place by the **Coordinator**.
9. Only if the **Coordinator** is then satisfied that the information recorded on the **DBS** certificate and the incident/s to which it relates does not make the Applicant an unsuitable person to work in the **Regulated Activity** role, will steps 7 a) to d) above be carried out and the Applicant will be allowed to serve in the agreed **Regulated Activity** role.

An individual who has committed an offence against a child or who, for any other reason is considered by the **Coordinator** to be unsuitable to work with children or adults at risk, **will not be appointed** to a role with children and young people or with adults at risk (as appropriate).

Neither the **Coordinator** nor the **Safer Recruitment Administrators** are permitted to keep records of the results of a **DBS check** (whether it is blemished or not, nor the facts pertaining to the blemish) for more than 6 months. The **Coordinator** will maintain a “Single Central Record” of recruitment checks and a training log. No physical copies of any **DBS** certificate will be retained by us.



## 7.3 WHICH WORKERS WILL BE REQUIRED TO COMPLETE THE SAFER RECRUITMENT PROCESS?

### 7.3.1 REGULATED ACTIVITY

All persons who are aged 18 years or over and who apply for **Regulated Activity** roles with children (including those who help in the crèche), young people or with adults at risk will be required to go through our **Safer Recruitment Process** and to apply for an Enhanced **DBS** certificate through the **DBS** where it is legal to do so.

Applicable **Regulated Activity** roles include, but are not limited to:

- **Child workforce:** crèche, Sunday school teacher/assistant, children and youth activities, leader of children's/youth work, driver of children/youth, leader of a ministry which has under 18 year olds serving.
- **Adult workforce:** leader of ministry to adults, adults at risk worker, driver of adults at risk, befriender, Christians Against Poverty (CAP) worker.
- **Adult and Child workforce:** minister, ministry trainee, elder, trustee, care team leader or any combination from the above areas.

### 7.3.2 NON-REGULATED ACTIVITY

Where a person is not working in a **Regulated Activity** with children or young adults, but they supervise, teach, train, instruct and/or care for children, or provide advice and/or guidance on wellbeing or drive a vehicle only for children on more than one occasion then they are eligible for an Enhanced **DBS check** but without a search of the barred lists. Such workers will have to complete the **Safer Recruitment Process**.

### 7.3.3 INFREQUENT CONTACT

Those workers who have 'infrequent contact' with children (like those helping out with children at events like the annual Co-Mission Revive Bible Festival, holiday clubs or those who give children lifts to church events from time to time) are now required to complete our **Safer Recruitment Process** and to obtain an Enhanced **DBS check** (without the barred lists being searched). If such workers already have an Enhanced **DBS** which is on the **DBS** update service (which is less than 3 years old) then further checks may not be required.

### 7.3.4 THIRD-PARTY ORGANISATIONS

If any worker has been sent to serve with us by a third-party organisation (such as Reach Global or London City Mission), it may be that the third party has already required its workers to undergo a thorough vetting process that includes police checks and references. If such a person will be working with children or adults at risk at any of **our Churches**, the **Coordinator** will need to check with the third party that they have done all the proper checks and, in addition, the **Coordinator** will require the worker to complete our **Safer Recruitment Process** and to attend relevant safeguarding training.

### 7.3.5 OTHER INFORMATION

#### YOUNG HELPERS

Individuals under the age of 18 but in Year 9 or above at school (this may include children seeking to volunteer for the Duke of Edinburgh scheme or for work experience) may be allowed, if invited by the group or ministry team leader, to help out with children at one of **our Churches** (under adult supervision). They cannot be counted into the adult/child ratios or bear any responsibilities.

**Young Helpers** will be required to go through a reduced **Safer Recruitment Process** to include:

- i. Application form (including references)
- ii. Reference checks
- iii. Reading and signing the Safe Practice Code of Conduct

They will also be invited to attend safeguarding training, but their attendance will not be compulsory.

**Young Helpers** will

- be under the care of an adult Worker at all times
- not be given responsibility for other people
- not be left alone with other people
- not be asked to take other people to the toilet
- be given training suitable to enable them to carry out their role

## TRUSTEES

The **Trustees** are required to complete the full **Safer Recruitment Process**, obtain child and adult workforce enhanced **DBS** certificates (without the barred lists) in their capacity as **Trustees** and to attend regular safeguarding training.

## PASTORS, ELDERS AND WIVES

The **Churches'** Pastors and their wives together with the **Churches'** elders and their wives will also be required to complete the **Safer Recruitments Process**, including the acquisition of a **DBS** certificate as a Pastor, Assistant Pastor, Sunday School Teacher, Youth Worker, Driver of Adults at Risk (in certain circumstances only) or something similar and will be required to attend regular safeguarding training. This is so that if needed they can serve if there is an urgent or unexpected need.

The only individuals that are exempted from our **Safer Recruitment Process** are those whose contact with children will always be under the supervision of the child's parents/carers (e.g. during a parent and toddler group). However, we will require the overall leaders of such groups to complete the **Safer Recruitment Process** and to attend safeguarding training.

Advice can be sought from the **Coordinator** or from **CSS** regarding whether **DBS checks** can/must be sought for a specific role.

## 7.3.6 ADDITIONAL CHECKS FOR WORKERS WHO HAVE LIVED OVERSEAS

### 7.3.6.1 EMPLOYEES RECRUITED FROM OVERSEAS

When recruiting workers from overseas, we will follow the **Safer Recruitment Process**.

If a Church is considering an applicant with substantial or sole overseas residency, a **DBS** Check in this country may have little value because it is unlikely to pick up charges or convictions relating to offences committed overseas.

Therefore, in addition to requiring such employees (or potential employees) to complete the **Safer Recruitment Process**, we will also need to make additional efforts to minimise the risk that the worker may be an unsuitable person to work with children, young people and/or adults at risk. In such circumstances, even if the employee has obtained a satisfactory Enhanced **DBS**, the **Coordinator** will:

- Require the employee to obtain either a criminal record check or a 'Certificate of Good Conduct' from all countries where the worker has resided in the past five years; or
- Where the criminal record check or Certificate of Good Conduct cannot be obtained, or has not been supplied by the country or countries concerned within 90 days of the request having been made, seek two additional references from the Pastor of their overseas church and from another senior leader of that church. Once those references have been received, the **Coordinator** will carry out a written risk assessment before making a formal recommendation to the **Trustees**. The **Trustees** will then decide whether to allow the employee to serve in the **Regulated Activity** role.

### 7.3.6.2 OTHER WORKERS WHO HAVE LIVED OR WORKED OVERSEAS

Likewise, all other Applicants for roles which require an Enhanced **DBS** certificate to work with children and/or adults at risk who have previously lived or worked outside the UK for over three months within the previous five years must undergo the same rigorous checks. If any of the applicant's addresses disclosed in their **DBS** application are overseas, even if the worker has obtained a satisfactory Enhanced **DBS**, the **Coordinator** will:

- Require the applicant to obtain either a criminal record check or a 'Certificate of Good Conduct' from all countries where the applicant has resided in the past five years; or
- Where the criminal record check or Certificate of Good Conduct cannot be obtained, or has not been supplied by the country or countries concerned within 90 days of the request having been made, seek two additional references from the Pastor of their overseas church and from another senior leader of that church. Once those references have been received, the **Coordinator** will carry out a written risk assessment before deciding whether or not the applicant should be permitted to serve in the **Regulated Activity** role.
- Where the **Coordinator** has any ongoing concerns, she will ask the **Trustees** to make the final decision.

## 7.4 REPEAT CHECKS/ RENEWALS

Subsequent **DBS checks** will be obtained for all relevant workers every three years or sooner.

- Where the worker has already signed up to the **DBS Update Service** and has granted us consent to use that information, we will check the worker's online **DBS** certificate every 18 months.
- Where the worker has not signed up to the **DBS Update Service** the **Safer Recruitment Administrator** will initiate an electronic **DBS** application for the Applicant on the **CSS** ebulk system and once the Applicant has filled in their personal details the **Coordinator** will be notified and will in turn notify the **Safer Recruitment Administrator** to complete their part of the application

Every three years, all workers will be notified by their **Safer Recruitment Administrator** that the three-year period is expiring and that they will need to complete a further revised **Safer Recruitment Process** as a way of determining their desire and continued eligibility to serve. Workers will be required to:

- Fill out a Renewal Application form;
- Sign the Code of Conduct; and
- Attend safeguarding training within 6 months of expiry.

Workers will also be urged to utilise the **DBS Update service** and to consent to having their **DBS** certificate checked on the Update Service every 18 months.

# 8 MANAGEMENT OF PAST OFFENDERS OR THOSE WHO POSE A RISK TO OTHERS

## 8.1 SUPPORTING THOSE AFFECTED BY ABUSE

We are committed to offering pastoral care and support to all those in **the Churches** who have been affected by recent and/or non-recent abuse.

Pastoral care will be offered without prejudice to all those who require it, including known sex offenders. Where pastoral care is offered to both the person affected by abuse and to the known offender, this will be offered by different people who are able to support those concerned impartially and effectively.

## 8.2 OUR DUTIES IN RESPECT OF THOSE WHO POSE A RISK

It is the nature of Christian outreach and ministry that some people who come to church and seek to participate in church activities will be past offenders. Whatever our pastoral concerns for such people, our priority will always be the safety of the children and the adults at risk within **our Churches**. Where it is known or suspected that a person of concern is attending one of **our Churches** and/or their activities, we have a duty to discuss this with the local police, probation and/or social services (as appropriate). This will help us to ensure that we are doing everything possible to keep children and adults at risk safe within **our Churches**.

Due to the addictive and persistent nature of abusive behaviour, we recognise that those attending **our Churches** who are known to pose a risk (having committed, or being the subject of an allegation of sexual or other crimes against children, young people or adults at risk), will need robust measures put in place to ensure that children and adults at risk are safeguarded.

## 8.3 WORKING WITH THOSE WHO POSE A RISK

We undertake to treat all applicants for positions within **our Churches** fairly and not to discriminate unfairly against the subject of a **DBS** disclosure on the basis of conviction information revealed. Having a criminal record will not necessarily bar an individual from working or volunteering in positions within **our Churches**.

### 8.3.1 STAFF RECRUITMENT

We operate a fair recruitment policy that ensures individuals have the opportunity to disclose any convictions or conviction information in a way that allows us to carry out a clear risk assessment in order to determine whether or not the conviction information is relevant to the position applied for. This will take account of:

- The nature of the conviction and the seriousness of the offence revealed
- The length of time since the offence took place
- Whether the applicant has a pattern of offending behaviour
- Whether the applicant's circumstances have changed since the offence took place.

As part of our recruitment policy, we will request the appropriate level of **DBS check** (if this is a requirement of the position) at the final part of the recruitment stage, when a position has been offered. Should we then decide that the information disclosed is relevant to the post applied for, we will withdraw the offer of employment and notify the applicant accordingly.

It is an offence for an individual who is barred to undertake the type of regulated work from which they are barred. It is also an offence to make an application to be considered for such work.

It is an offence for an organisation to offer regulated work (paid or voluntary) with children and/or adults at risk to someone who is barred or to fail to remove a person from regulated work if the organisation has been notified that they are barred.

### 8.3.2 CHURCH PARTICIPATION AND CONTRACTS OF CARE

When someone attending one of **our Churches** is known to have abused children, or may pose a danger to adults at risk, we will ensure that the individual has appropriate supervision and is offered pastoral care. In addition, we will set boundaries for that person which they will be required to keep and we will make use of risk assessment and/or Contract of Care agreements. Where required, the **Coordinator** will seek advice from legal counsel and/or **CSS** and/or the Police and Probation Service.

When it is known or suspected that a serious offender is attending any of **our Churches**, ministries or activities, we will take the following steps:

- If the offender self-discloses their offending past or the church is notified of the offences by other agencies the **Coordinator** will notify the **Trustees** and, where required, seek additional advice.
- If the suspected offender has not self-disclosed, the **Coordinator** should meet with them together with one or two members of the church's leadership.
- Where it is confirmed that the person is a sex offender or other serious offender, the **Coordinator** will make it clear to the offender that, in everyone's interests, the **Coordinator** will contact the police and social work department of criminal justice to ensure appropriate arrangements are put in place.
- The **Coordinator** will communicate with the other agencies and will prepare a suitable risk assessment, addressing how the offender can be properly supported to enable them to participate safely in the activities of the church. Where appropriate, the responsible agencies will share with the **Coordinator** relevant details of the Multi Agency Public Protection Arrangements (MAPPA) risk assessment for the offender.
- A bespoke Contract of Care will be drafted by the **Coordinator** or our legal advisers outlining the proposed arrangements for the management and support of the offender.
- The **Coordinator** will arrange for the relevant church's Senior Pastor to establish a "Contract of Care team" which will comprise the Senior Pastor, another senior leader from the offender's church and, usually, one leader from one of our other **Churches** (see section 8.4 below). The **Coordinator** and the Contract of Care team will then meet with the offender to seek their agreement to the proposed contract. This contract will then be signed and dated by all parties (i.e. the offender, the **Coordinator** and the Contract of Care team).
- If the offender refuses to sign the Contract of Care, the Church's Senior Pastor and the **Coordinator** will inform the offender that they can no longer attend any of **our Churches** or activities.
- Following the signature of the Contract of Care, the Contract of Care team will monitor the offender's compliance and any breaches will be notified to the **Coordinator** and be reported under the terms of MAPPA.
- If the individual under one of our Contracts of Care wishes to attend a Co-Mission event where children and/or adults at risk are present (such as the Revive Bible Festival), then the Contract of Care team should notify the **Coordinator** who will liaise with the event organisers without identifying the individual concerned. A bespoke Contract of Care will be created for that event by the **Safeguarding Coordinator** responsible for the event or by appropriate legal counsel and it will be signed in advance by the individual concerned and other relevant parties. Where necessary, a "chaperone rota" for the individual concerned will also be created in advance by the church where the individual attends. The chaperone rota will last for the duration of the

event (or for whatever portion of the event the offender attends) and will ensure that the individual is properly chaperoned at all times.

- If the individual fails to abide by the boundaries set out within the Contract of Care, the **Coordinator** will contact the police for advice and the Senior Pastor and the **Coordinator** will together inform them that they can no longer attend any of **our Churches** or activities.
- If the individual stops attending their church, the Contract of Care team will notify the **Coordinator** and the **Coordinator** will inform the Police Child Protection team and, where relevant Probation services. The **Coordinator** may also notify the senior pastors of **our Churches** that this individual may be looking for another local church and that the **Coordinator** should be informed if he or she starts to attend (without sharing any details of the individual other than their name).
- Information regarding the individual and their offence/s, details of the members of the Contract of Care team and the contents and existence of a Contract of Care are to be kept confidential by the **Coordinator** and **Trustees**. The information must not be shared with other staff or church leaders unless the **Coordinator** and/or the **Trustees** have agreed (in advance) that there are sound safeguarding reasons for the confidential information to be securely disclosed to one or more staff or church leaders for the protection of children and/or adults at risk.

## 8.4 CONTRACT OF CARE TEAM

- It is best practice that one member of the Contract of Care team attends a different church from the one that the offender attends. If it proves difficult to include a leader from another church, the Senior Pastor may seek permission from the **Trustees** to only include leaders from the church which the offender attends. However, the **Trustees** will only provide their consent where the request can be properly justified and they are satisfied that the proposed participants are appropriate.
- The Contract of Care team will function in liaison with the Police and, where relevant, Probation services.
- The Contract of Care team will undertake a regular review of the contract at intervals.
- The Contract of Care team will send an annual report on the offender to the **Coordinator**.

# 9 DEALING WITH ALLEGATIONS AGAINST OUR WORKERS

## 9.1 RESPONSIBILITY

The **Charity** takes allegations against our staff and volunteers very seriously and will ensure that they are investigated thoroughly, via a transparent process that expedites the matter in a timely manner. We recognise that we have the responsibility to take the allegations seriously, to manage the situation effectively while the investigation takes place and to support the person accused throughout the process. In all cases of potential misconduct, the **Trustees** will make the appropriate pastoral care of victims their primary concern, and in this regard, will seek external advice from professionals such as **CSS**.

## 9.2 SUMMARY OF PROCEDURES

Safeguarding allegations against staff or volunteers within **the Charity** and/or its Churches should be reported to the **Coordinator** (or, in her absence, to the **Deputy Coordinator**) and/or to the **Trustees** (cmct-trustees@co-mission.org). Other complaints or concerns should be reported using **the Charity's** separate complaints procedure – see section 5.5 above.

1. On receipt of an allegation, the **Trustees** and the **Coordinator** (or, in her absence, the **Deputy Coordinator**) will urgently assess whether any immediate action is required to ensure the safety of everyone involved.
  - a. Dependent upon circumstances, and the immediate action required, it may be necessary to notify the individual that an allegation has been received.
  - b. If so, care will be taken not to compromise the gathering of evidence.
  - c. If it is necessary to notify the individual at this stage, details of the allegation will not be divulged.
2. The **Trustees** will ensure that support is offered to both the worker who is the subject of the allegation and to any potential victims.
3. At the earliest opportunity, the LADO (Local Authority Designated Officer) should be consulted. If the LADO is unavailable, initial advice can be sought from **CSS**.
4. If the allegation meets the threshold for LADO, the **Coordinator** will notify the **Trustees** and together with leaders of the church (where applicable) will work with LADO to ensure that the allegation is thoroughly investigated, and all issues raised are addressed.
5. If the allegation does not meet the threshold for LADO, the **Coordinator** will consult with **CSS**, who will provide independent support and advice to ensure transparency.
6. Where an allegation is made against a volunteer, and is reported to LADO the **Trustees** should temporarily require the volunteer to discontinue their involvement in the **Regulated Activity** pending enquiries. This would certainly be the case where there is evidence that further harm may come to children or adults if they are not removed from duties. The **Trustees** may recommend or require that the volunteer temporarily ceases all forms of service and ministry for their church.
7. Where an allegation is made against an employee, the best course of proportionate action (for example, suspension or change of duties) will be decided by the **Trustees** in liaison with the **Coordinator** and after consultation with **CSS**, the **Charity's** legal advisers and/or other relevant outside agencies. Serious consideration will be given to suspending the worker where there is evidence that further harm may come to children or adults if they are not removed from duties (albeit temporarily). However, the **Trustees** will need to follow the **Charity's** employment policies and disciplinary/dismissal process (see the **Charity's** employment contracts and Staff Handbook) and will not suspend a worker unless that is considered to be both proportionate

and necessary. Where the **Trustees** choose not to suspend the employee, they may instead decide to revise the employee's job responsibilities so that they are removed from the activities involving children and young people or adults at risk whilst the allegation is investigated. During such situations, the **Trustees** will arrange for the worker to be closely supervised without raising suspicion during the period between the matter coming to **the Charity's** attention and the authorities being informed.

8. Cases of serious harm will be reported to the Charity Commission by the **Trustees**.
9. We understand that some allegations may be made maliciously but are committed to taking all claims seriously and to properly investigating them.

## 9.3 EXTERNAL REPORTING AND LIAISON

The nature of the allegation may well dictate the response, particularly if it is of a serious nature that requires the involvement of the local Children's Social Services (M.A.S.H Team), the local Adult Services (L.A.D.O) and the Police.

### 9.3.1 INFORMING THE LOCAL STATUTORY AGENCIES

Where the allegations are serious (in the opinion of the **Coordinator**) and involve children, the **Coordinator** will notify the local M.A.S.H Team. The M.A.S.H team will have a Designated Officer or team of officers who will have responsibility to ensure that all allegations of abuse against people working with children are dealt with fairly and efficiently.

Where the allegations are serious (in the opinion of the **Coordinator**) and involve adults, the **Coordinator** will contact the LADO. Their Safeguarding Adult Boards (SAB) may provide specific local advice.

The **Coordinator** will appropriately involve the Designated Officer, the SAB and/or the Police where necessary in dealing with allegations against workers. In addition, where allegations have been substantiated or there is sufficient cause for ongoing concern regarding a workers' conduct with children, young people or adults at risk, the **Coordinator** will also need to liaise with the **Trustees** to determine whether a report should be sent to the **DBS**, the Charity Commission and/or **the Charity's** insurers.

### 9.3.2 REFERRING TO THE DISCLOSURE AND BARRING SERVICE

We have a legal duty under the Safeguarding Vulnerable Groups Act 2006 to make a referral to the **DBS** when:

- allegations have been substantiated or there is sufficient cause for ongoing concern regarding a workers' conduct with children, young people or adults at risk; and/or
- we take the decision to 'dismiss or remove' a worker from working with vulnerable people. This would generally apply at the point at which the worker is cautioned or convicted for a 'relevant offence' or where they are believed to have engaged in 'relevant conduct' with a child or adult at risk.

Where the **DBS** determines that there is sufficient evidence, they have the power to place the worker on the list of those barred from working with children. Similarly, where there is concern about the conduct of someone who has worked with adults at risk, it will be appropriate that the worker is referred to the **DBS** for consideration to be added to the Barred List.

### 9.3.3 REPORTING TO THE CHARITY COMMISSION

As we are a Charity, our **Trustees** are required to inform the Charity Commission when a '**Serious Incident**' has occurred and to make that report as soon as possible. Under Charity Commission guidance, a **Serious Incident** occurs where a result has, or could, entail '...a significant loss of funds or a significant risk to **the Charity's** property, work, beneficiaries or reputation.' A safeguarding incident or allegation



may amount to a **Serious Incident** because of the significant impact which it may have upon **the Charity**, our reputation and upon those whom we seek to serve.

Charity Commission guidance (<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>) states:

“You need to make a report to the Commission if a serious safeguarding risk materialises. This will usually be if any of the following occur:

- incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults or children) which have resulted in or risk significant harm to them and:
  - this happened while they were under the care of the charity
  - someone connected with the charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual)
- other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity’s activities
- breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children and/or adults at risk

The above may include incidents in the workplace that have resulted in or risk significant harm to trustees, staff or volunteers. This does not mean that the Commission expects charities to report every internal staffing incident - charities need to make a judgement call about which incidents either individually, or as a collection, are serious in the context of the charity.

However, a report should always be made where the level of harm to the victims and/or the likely damage to the reputation of or public trust in the charity is particularly high (for example, sexual misconduct by the charity’s Chief Executive or another person in a senior position or position of specific responsibility, such as the head of safeguarding). The Commission would also expect to receive a report if the number and nature of staffing incidents indicate there are widespread or systematic issues connected to sexual harassment, abuse and/or other misconduct in a charity.”

If the **Coordinator** believes that a report may be required, the **Coordinator** will discuss the matter with the Director of Charity Services (if possible) and together they will consult with the **Trustees** and, where appropriate, seek legal advice. The decision as to whether or not to make the report to the Charity Commission will be made by the **Trustees**.

### 9.3.4 INFORMING THE INSURERS

Our Insurers may also need to be advised of a serious safeguarding incident in accordance with the terms and requirements of our policy. The **Coordinator** will discuss the matter with the Director of Charity Services (if possible) and together they will consult with the **Trustees** and, where appropriate, seek legal advice. The decision as to whether or not to make the report to our Insurers will be made by the **Trustees**.

## 9.4 DEALING WITH A WORKER WHO FACES ALLEGATIONS

### 9.4.1 SUSPENSION OF A WORKER

Where an allegation of abuse is made against a worker, depending on the nature of the allegation and any advice received from the local authority and/or the police, the **Trustees** will consider whether the worker ought to be suspended 'without prejudice', in other words without passing judgement on the validity of the allegation. The act of removing a worker (employees or volunteers) temporarily from their role or part of their role is not necessarily an assumption of guilt but may simply be a wise precaution.

This action protects the worker from further allegations of abuse, **the Charity** from allegations of not dealing with the situation appropriately and, perhaps most importantly, the child, young person or vulnerable adult from further abuse or intimidation. However, such a step would only be taken in consultation with our legal advisers and/or the statutory agencies.

### 9.4.2 SUPPORT FOR THE WORKER

During any investigation, we will allow the worker to have someone to support them and represent their interests throughout the process.

If it turns out the allegation is a conduct or relational issue rather than abuse, we will observe good personnel practices and properly support the worker as well as the person(s) making the allegation.

### 9.4.3 CONCERNS ABOUT PRACTICE AND WHISTLEBLOWING

We follow the principles contained in the Public Interest Disclosure Act 1998 and expect that all workers (paid or voluntary) will report improper actions and omissions. Further details can be found in **the Charity's** Staff Handbook. Whilst all malpractice and acts of discrimination will be investigated, it is especially important that suspicions of abuse are immediately reported to the **Coordinator**.

### 9.4.4 DISCIPLINARY PROCEDURES

**The Charity's** disciplinary and grievance procedures are set out in **the Charity's** Staff Handbook.

Where allegations and concerns are being dealt with that may lead to suspension or which warrant further investigation, a thorough and robust disciplinary investigation will be undertaken to establish 'on the balance of probabilities' what occurred and how this may impact the suitability of the worker to remain in or return to post. This will be undertaken by the **Trustees** with support from the Director of Charity Services and in liaison with the **Coordinator** and in consultation with our legal advisers and/or the local authority or Police (as appropriate). We will not reinstate the suspended worker until satisfactory conclusions have been reached.

Even if the person against whom an allegation is made resigns to avoid action being taken, we will still report the matter appropriately, complete an investigation into the allegations of abuse and take further action as necessary.

# APPENDIX 1: KEY CONTACTS

<b>Safeguarding Coordinator</b> (Day to day lead for all safeguarding matters)	Kris Dryden (e) safeguarding@co-mission.org (m) 07778 533 463
<b>Deputy Safeguarding Coordinator</b> (Fully trained cover and support for the Coordinator, part-time)	Rachel Allord (e) rachel.allord@co-mission.org
<b>Director of Charity Services</b> (Manages the <b>Safeguarding Coordinator</b> and advises/supports the <b>Trustees</b> )	Stephen Hatherall (e) stephen.hatherall@co-mission.org (t) 020 8181 5299
<b>Trustees</b> (Ultimately responsible for safeguarding)  By email: <a href="mailto:cmct-trustees@co-mission.org">cmct-trustees@co-mission.org</a>	Philip Cooper Gregor Ferguson John Marland Robert Turner Rosie Dunn
<b>Advisers</b> Helpline available 7 days a week from 7am -10pm	Christian Safeguarding Services 39 Gracedieu Road Loughborough Leics LE11 4QF (t) 0116 218 4420 (e)contact@theccss.co.uk
<b>Charity Commission</b> Helpline available Monday to Friday 9am to midday	The Charity Commission PO Box 211 Bootle L20 7YX (t) Helpline 0300 066 9197 24-hour voicemail service 0300 065 2199
<b>Insurance brokers</b>	Alison Maiden or David Ellison at Kingdom Bank (e) Alison.Maiden@kingdombank.co.uk (t) 0115 921 7270
<b>Legal advisers</b>	Ben Collingwood at Moore Barlow LLP (t) 01483 543 210 (e) ben.collingwood@moorebarlow.com

## A1.1 CONTACT DETAILS FOR STATUTORY SERVICES FOR CHILDREN

LOCAL COUNCIL	RELEVANT AGENCY	TELEPHONE
	Multi Agency Safeguarding Hub	020 8545 4226 or 4227
<b>Merton</b>	out of hours	020 8770 5000
	Police Child Protection Team	020 8687 4508
	Single Point of Access Team for Children	020 8547 5008
<b>Kingston</b>	out of hours	020 8770 5000
	Police Child Protection Team	020 8687 4508
	Multi Agency Safeguarding Hub	0208 770 6001
<b>Sutton</b>	out of hours	020 8770 5000
	Police Child Protection Team	020 8687 4508
	Multi Agency Safeguarding Hub	020 8871 7899
<b>Wandsworth</b>	out of hours	020 8871 6000
	Police Child Protection Team	020 8247 7827
	Children's Social Care	020 7926 3100
<b>Lambeth</b>	out of hours	020 7926 1000
	Children's Services	0300 470 9100
<b>Elmbridge</b>	out of hours	01483 517898
	Police Child Protection Team	101

## A1.2 LOCAL AUTHORITY SAFEGUARDING ADULTS TEAMS (L.A.D.O)

LOCAL COUNCIL	TELEPHONE	EMAIL
Merton	0208 545 3187 07814 642 728	LADO@merton.gov.uk
Kingston	020 8891 7370 020 8547 5008	LADO@achievingforchildren.org.uk
Wandsworth	020 8871 6622 07974 586 461	LADO>wandsworth.gov.uk
Sutton	020 8770 4776 020 8770 5000	LADO@sutton.gov.uk
Lambeth	020 7926 4679 07720 828 700	LADO@lambeth.gov.uk
Elmbridge	0300 123 1650	LADO@surreycc.gov.uk

# APPENDIX 2: LEGAL FRAMEWORK FOR POLICIES AND PROCEDURES

SAFEGUARDING CHILDREN	SAFEGUARDING ADULTS
<p>National legislation and guidance</p> <ul style="list-style-type: none"> <li>● Children Acts (1989 and 2004)</li> <li>● Children and Families Act 2014</li> <li>● Children and Social Work Act 2017</li> <li>● Working together to safeguard children (2018)</li> <li>● What to do if you're worried a child is being abused: advice for practitioners (Department for Education, 2015)</li> <li>● Protection of Children Act 1999</li> <li>● Safeguarding vulnerable groups act 2006</li> <li>● Protection of freedoms Act 2012</li> <li>● Disqualification under the childcare act 2006 (2018 amended)</li> <li>● Prevent duty guidance 2016</li> <li>● Sexual Offences Act 2003</li> <li>● The Safe Network Standards (available from the NSPCC website)</li> <li>● Keeping Children Safe in Community Activities 2020</li> <li>● Keeping Children Safe in After-school Clubs, community activities and tuition: Safeguarding guidance for providers 2023</li> <li>● The policy also takes account of the principles outlined in: <ul style="list-style-type: none"> <li>○ Keeping Children Safe in Education 2023</li> <li>○ FGM duty guidance</li> </ul> </li> </ul>	<p>National legislation and guidance</p> <ul style="list-style-type: none"> <li>● The Care Act 2014</li> <li>● Human Rights Acts 1998</li> <li>● Care Standards Act 2000</li> <li>● Mental Capacity Act 2005</li> <li>● Deprivation of Liberty Safeguards 2007</li> <li>● Sexual Offences Act 2003</li> <li>● Police and Criminal Evidence Act 1984</li> <li>● Fraud Act 2006</li> <li>● Public Interest Disclosure Act 1998</li> <li>● Health and Social Care Act 2008</li> <li>● Disclosure and Barring Service (DBS)</li> <li>● Multi-Agency Public Protection Arrangements (MAPPA)</li> <li>● Multi-Agency Risk Assessment Conference (MARAC)</li> <li>● LSAB Multiagency Policy and Procedures</li> </ul>
<p>Local guidance and procedures</p> <ul style="list-style-type: none"> <li>● Local Safeguarding Children Board procedures</li> <li>● Local authority guidance</li> </ul>	<p>Local guidance and procedures</p> <ul style="list-style-type: none"> <li>● Local Safeguarding Adults Board procedures</li> <li>● Local authority guidance</li> </ul>

# APPENDIX 3: SAFEGUARDING STATEMENT

*[To be prominently displayed in the Charity's church buildings and service venues (where possible, both in public areas and within rooms used for kids' and youth work) and on church websites.]*

The Co-Mission Churches Trust (CMCT) and the leaders of all our Churches recognise the importance of our ministries with children and young people and adults at risk. We recognise the need to provide a safe and caring environment and are committed to protecting and promoting the welfare of those entrusted to our care.

We are committed to:

- Following the requirements of UK legislation in relation to safeguarding children and adults at risk and good practice recommendations.
- Exercising proper care in the appointment and selection of all those who will work with children and adults at risk, and ensuring that workers adhere to the agreed procedures of our Safeguarding Policy.
- Supporting our Safeguarding Coordinator in her work and in any action she may need to take in order to protect children or adults at risk.
- Listening to, and supporting all those affected by abuse.

We recognise:

- Safeguarding is everyone's responsibility.
- That all safeguarding concerns and allegations must be reported to our Safeguarding Coordinator.
- Children's Social Services has lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about a child; and Adult Safeguarding services have lead responsibility for investigating all allegations or suspicions of abuse where there are concerns about an adult at risk.
- Where an allegation suggests that a criminal offence may have been committed then the police should be contacted as a matter of urgency.

We will review this statement and our Safeguarding Policy and procedures annually. Our Safeguarding Policy has been approved by our advisers, Christian Safeguarding Services and a copy is available from the church office.

If you have any concerns for a child or adult at risk, please contact the CMCT Safeguarding Coordinator:

**Kristine Dryden**

**(e) [safeguarding@co-mission.org](mailto:safeguarding@co-mission.org)**

**(m) 07778 533 463**

# APPENDIX 4: RELEVANT GROUPS IN OUR CHURCHES

## A4.1 CHILDREN'S / YOUTH MINISTRIES

CHURCH	GROUP	PERSON RESPONSIBLE	
Dundonald	6 months-11yrs	Natasha Small Rupert Cowan	
	11-18yrs	Pete Teeuwen-Greene	
	Mums and Tots	Genevieve Johnston	
Grace Church Worcester Park	Crèche 0-2 years	Anna Lane	
	Sunday school 3-11 years	Anna Lane	
	Ignite 11-14 years	Anna Lane	
	Roots 14-18 years	Anna Lane	
	Xplode	Anna Lane Tim Guest	
	Men Behaving Dadly Toddler Group (Saturdays monthly)	Tim Guest	
Christ Church at All Saints Wandsworth	Crèche 0-3yrs	n/a	
	Flames (Reception - Yr 2)	Rachel Allord	
	Sparks (Yr 3 - Yr 6)	Rachel Allord	
	Youth Groups	Linda Trevitt	
Christ Church Balham	Crawlers 0 - 18 months	Fiona Harman	
	Climbers 18 months - 3yrs	Bea Bennett	
	Adventurers 3yrs - Reception	Laura Ratcliffe	
	Hikers Year 1 - Year 3	Sarah Wilmot	
	Mountaineers Year 3 - Year 6	Sarah Wilmot	
	Balham Boppers Toddler Group (Under 5s, Fridays)	Bea Bennett	
	Balham Blazers Yr 1 - Yr 3 (Fridays)	Bea Bennett	
	Dangerous Club Yr 4 - Yr 6 (Fridays)	Bea Bennett	
	Creche to enable women's bible study groups		Hannah Gately (Mon) Fiona Harman (Weds)



Cornerstone Kingston	Crèche 0-2 years	Lauren Collins
	Sunday School 2yrs-11yrs	Rory Bell
	Soul (Sunday am and Friday pm)	Phil Smith Rory Kinnaird
	Rooted (Sunday am and Friday pm)	Rory Kinnaird
	Monday Tots	Dean Dryden
	Men Behaving Dadly (Saturdays Monthly)	Dean Dryden
	Hub Club	Dean Dryden
	Breakfast Church	Dean Dryden
King's Church Walton	Jesters under 3yrs	Nina Woodward
	Archers 3yrs-5 yrs	Laurelle Wellinger
	Falconers 5yrs-7yrs	Debbie Green
	Nobles 7yrs-10yrs	Nicola Martin
	Citizens 10yrs-14 years	Naseem Allan
	Youth 10yrs-18yrs	Pete Matthew
Hope Church Sutton	Hope Tots 0-4yrs	Lizzie Holmes
	Hope Kids -Reception to Yr 2	Lizzie Holmes
	Hope Juniors Yr 3-Yr 6	Lizzie Holmes
	Ignite 7yrs -9yrs	Lizzie Holmes
	Epic 10yrs-13yrs	Lizzie Holmes
The Boathouse Church Putney	Tiny Tots Birth - Reception	Toni Edmonds-Smith
	Bible Discoverers Years 1 - 4	Rueben Fromow
	Bible Explorers Years 5 - 6	Rueben Fromow
	Ignite Year 6+	Rueben Fromow
	Junior Jivers (weekday mums and tots)	Catrin Lee

## A4.2 OTHER MINISTRIES COVERED BY THE POLICY

CHURCH	GROUP	PERSON RESPONSIBLE
Dundonald Church	Outreach to seniors	Louise Wootton
	Senior Citizens Afternoon Teas	Michaela Janks
	Sheltered Homes	Benita & Jonathan Mathews (Naomi Watts House) Sophie Fountain & Paul Simpkin (The Pantiles, Wimbledon)
	Nursing homes	Moira Kirkpatrick Jonathan Mathews
	Senior Seekers	Libby Leadbeater Benita Mathews
	Holiday at Home	Louise Wootton
	Care team for adults	tbc
	Cornerstone Church Kingston	International Cafe
Hub Crafts (Monthly)		Anne Woodcock

When children or young people are present at meetings that are primarily aimed at adults and childcare is not provided and their parents are present (e.g. homegroups, special events etc.):

- During these times, children remain the responsibility of their parents who are responsible for their safety and care
- Any concerns or support needs identified will be recorded and reported to the **Coordinator** in the usual way

When young people are present at meetings that are primarily aimed at adults and participate in those meetings in their own right (men's/women's events, special events etc.):

- Although there are not specific procedures for such meetings, the normal principles of safeguarding will apply
- If the young person is not believed to be competent to consent to attendance, consent will be sought from their parents / carers
- If the young person is believed to be competent to consent to attendance, they will be encouraged to be open and transparent with their parents / carers and consent will be sought for the church to contact the parents and establish open communication and transparency
- Leaders of the church or of the meeting in question will be vigilant to ensure that the young person is adequately protected
- Any concerns or support needs identified will be recorded and reported to the **Coordinator** in the usual way.

# APPENDIX 5: SAFEGUARDING ADULTS AT RISK

## A5.1 THE CARE ACT 2014

The Care Act 2014 (Care Act) came into effect in April 2015. The Care Act puts much greater responsibility upon local authorities to assess needs and investigate concerns. Whilst the term “vulnerable” adults was previously used, Government guidance now directs us to use the safeguarding term more broadly by way of thinking about ‘adults who are at risk of harm’.

## A5.2 DEFINITION OF “ADULT AT RISK”

*“An adult at risk of abuse or neglect is defined as any person who is aged 18 years or over who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves.” (Care Act)*

It should be noted that reaching a certain age or having a particular disability does not in itself mean that a person is at risk or vulnerable, any more than we are all at risk in certain situations.

## A5.3 DEFINITION OF ABUSE

Abuse is a “violation of an individual’s human rights and civil rights by another person or persons”.

Essentially an “adult at risk” is someone who has care and support needs, whether or not those care or support needs are being met and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

## A5.4 EXAMPLES OF ADULTS AT RISK

Some adults might be more at risk than others, and there are some times in life when risks may increase. All people may be vulnerable/at risk at some time or times of their lives. Vulnerability can be permanent or temporary (an example of temporary vulnerabilities might be a woman with post-natal depression who seeks medical help and other support and recovers after a period of time) and can be of a greater or lesser degree. It can be increased by various factors including any of the following:

- Learning, sensory or physical disability
- Old age and frailty (especially if it creates a dependency on or needing help from others)
- Mental health problems
- Dementia or confusion
- Illness
- Addiction or dependence on alcohol, drugs or medication
- Bereavement
- Past abuse or trauma
- English is not their first language
- Being detained in lawful custody

## A5.5 THE CATEGORIES OF ABUSE IN ADULTS (AND KEY INDICATORS)

The Care Act provides guidance on the following categories of abuse as regards adults in the United Kingdom. They are as follows:

### A5.5.1 PHYSICAL

**Definition:** To inflict pain or physical injury, which is either caused deliberately or through lack of care.

Includes:

- Hitting, slapping and beating
- Shaking, pinching and pushing
- Kicking, burning and hair pulling
- Squeezing, suffocating, poisoning and using inappropriate restraint
- Giving inappropriate medication

Key indicators

- Cuts, lacerations, puncture wounds, open wounds, welts
- Bruising and discolouration- particularly if there is a lot of bruising of different ages
- Black eyes, burns, broken bones and skull fractures
- If the person is seen to have injuries that recur or are in the same place on more than one occasion or are without plausible explanation
- Any injury that has not been properly cared for
- Poor skin condition or poor skin hygiene
- Loss of hair, loss of weight and change of appetite
- Insomnia or unexplained paranoia, anxiety
- Person flinches at physical contact and/or keeps fully covered, even in hot weather
- Person appears frightened or subdued in the presence of a particular person or people

### A5.5.2 SEXUAL

**Definition:** the involvement in sexual activities to which the person has not consented, or does not truly comprehend and so cannot give informed consent. It may occur where the other party is in a position of trust, power or authority and uses it for sexual purposes.

Includes

- Rape, sexual assault or sexual acts to which the person has not consented, could not consent or was pressured into consenting
- Indecent assault, incest, being forced to touch another person in a sexual manner without consent
- Making sexual remarks, suggestions and teasing
- Indecent exposure, being forced to watch pornographic material or sexual acts
- Enforced or coerced nakedness or inappropriate photography of a person in sexually explicit ways
- Being spied upon while a person is undertaking personal care activities

Key indicators

- Emotional distress
- Mood changes
- Expressions of feelings of guilt or shame
- Itching, soreness or lacerations
- Bruises around the breast or genital areas

- Difficulty in walking or sitting
- Unexplained vaginal or anal bleeding
- Unexplained venereal disease or genital infections
- Disturbed sleep patterns
- Torn, stained or bloody underclothing
- Significant changes in sexual behaviour or outlook
- Preoccupation with anything sexual
- A woman who lacks the mental capacity to consent to sexual intercourse becomes pregnant

### A5.5.3 DOMESTIC VIOLENCE/ABUSE

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

Key indicators

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

### A5.5.4 PSYCHOLOGICAL OR EMOTIONAL

**Definition:** Acts or behaviour which causes mental distress or anguish or negates the wishes of the adult. It is also behaviour that has a harmful effect on the adult's emotional health and development or any other form of mental cruelty.

Includes

- Verbal abuse, mocking, coercing, threatening or controlling behaviour
- Bullying, intimidation, harassment or humiliation
- The lack of privacy or choice, denial of dignity, deprivation of social contact or deliberate isolation
- Making someone feel worthless, a lack of love or affection, or ignoring the person.
- Preventing someone from receiving services or support

Key indicators

- Changes in mood, attitude and behaviour
- Becoming quiet or withdrawn or conversely becoming aggressive or angry for no apparent reason
- Denial and hesitation to talk openly
- Excessive fear or anxiety
- Changes in sleep pattern
- Loss of appetite
- Helplessness or passivity
- Confusion or disorientation
- Implausible stories
- Low self-esteem
- Unclear or confused feelings towards an individual

## A5.5.5 FINANCIAL OR MATERIAL

**Definition:** The inappropriate use, misappropriation, embezzlement or theft of money, property or possessions.

Includes

- Theft, fraud or embezzlement of monies, benefits or goods
- Exploitation or profiteering
- Applying pressure in connection with wills, property, inheritance, or financial transactions
- The abuse of influence, power or friendship to persuade a person to make gifts or change their will
- Being charged excessive amounts for services (such as minor building works on a property)

Key indicators

- Unexplained loss of money
- Missing personal belongings such as art, jewellery and silverware
- Deterioration in standard of living, not having as much money as usual to pay for shopping or regular outings
- Inability to pay bills, getting into debt
- Sudden changes in a person's finances
- Person unable to access their own money or check their own accounts
- Cheques being signed or cashed by other people without someone's consent
- Recent acquaintances expressing sudden or disproportionate interest in the person or their money
- Reluctance on the part of the family, friends or the person controlling the person's funds to pay for necessary food, clothes or other items
- Recent changes of deeds/title of home
- Inappropriate granting and/or use of Power of Attorney
- Sudden change or creation of a will to benefit an individual significantly

## A5.5.6 MODERN SLAVERY

**Definition:** Modern slavery is the practice of treating people as property; it includes slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Includes

- labour exploitation - a person is forced to work for little or no wages, or through violence and intimidation
- domestic servitude- a person is forced to work in private households, perhaps cooking, cleaning and looking after children, with little freedom or pay
- sexual exploitation / human trafficking
- criminal exploitation - a person is forced into crime such as carrying drugs, theft, or fraud; forced begging
- forced/early marriage

Key indicators

- appear to be under the control of someone else and reluctant to interact with others
- not have personal identification on them
- few personal belongings, wear the same clothes every day or wear unsuitable work clothes
- not be able to move around freely
- be reluctant to talk to strangers or the authorities
- appear frightened, withdrawn, or show signs of physical or psychological abuse
- dropped off and collected for work always in the same way, especially at unusual times

## A5.5.7 DISCRIMINATORY

**Definition:** Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)

Includes

- Misuse of power that denies opportunity to some groups or individuals
- Ageist, racist, sexist, or abusive behaviour based on a person's disability
- Abuse linked to a person's sexuality
- Harassment, slurs or similar treatment
- Withholding services without the proper justification, or lack of disabled access to services and activities.

Key indicators

- Low self-esteem
- Withdrawn
- Anger
- Person puts themselves down in terms their gender, sexuality or disability
- Abuse may be observed in conversations or reports by the person of how they perceive themselves

## A5.5.8 ORGANISATIONAL/INSTITUTIONAL

**Definition:** The mistreatment or abuse of an adult by an organisation or individuals within an institution. It can occur through repeated acts of poor or inadequate care and neglect, or poor professional practice or ill-treatment.

Includes

- 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 home.
- The inability of an institution to safeguard people from emotional or even physical harm and neglect
- Having fixed rules and routines by which people are controlled
- People prevented from doing things that are their rights
- No access to personal possessions or personal allowance.

Key indicators

- Being routinely referred to in a condescending fashion
- Disrespectful language and attitudes
- Being spoken to or treated like a child
- A person's privacy and dignity is routinely compromised
- Failure to recognise the individuality of people and applying a 'one size fits all' approach to support
- No evidence of support services' care plans that focus on the individual's needs
- Premises that are regularly understaffed

## A5.5.9 NEGLECT OR ACTS OF OMISSION

**Definition:** the repeated deprivation of help that an adult needs which, if withdrawn, will cause them to suffer. Neglect can be deliberate or can occur as a result of not understanding what someone's needs are.

Includes

- Failing to provide access to appropriate health, social care or education services
- Ignoring medical or physical care needs, including not giving someone proper food or assistance with eating or drinking
- Failing to intervene in behaviour which is dangerous to the adult (particularly when the person lacks the mental capacity to assess the risks to themselves and others)
- Failing to provide safe, warm and comfortable environment
- Deliberately withholding aids, such as walking sticks or hearing aids
- Denying social, religious or cultural contacts
- Denying contact with the family
- Leaving alone or unsupervised

Key Indicators

- Person looking unkempt or dirty and had poor personal hygiene
- Person is malnourished, has sudden or continuous weight loss and is dehydrated
- Person is dressed inappropriately for the weather conditions
- Dirt, urine or faecal smells in a person's environment
- Home environment does not meet basic needs (e.g. no heating or lighting)
- Health and safety hazards in the living environment
- Untreated medical conditions, pressure sores, rashes, lice on the person
- Depression
- Person and/or carer have inconsistent or reluctant contact with Health and Social Services
- Callers/visitors are refused access to the person
- Prolonged isolation or lack of stimulation
- Person who is not able to look after themselves is left unattended and so put at risk
- Not being helped to the toilet when assistance is requested

### A5.5.10 SELF-NEGLECT

**Definition:** Self-neglect includes a wide range of behaviour neglecting one's personal hygiene, health or surrounding and includes behaviour such as hoarding.

Includes

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Key Indicators

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury



## A5.6 OTHER FORMS OF ADULT ABUSE

### A5.6.1 CYBER ABUSE (CYBER-BULLYING OR CYBER-STALKING)

The use of information technology (email, mobile phones, websites, social media, instant messaging, chat rooms, etc.) to repeatedly harm or harass other people in a deliberate manner.

### A5.6.2 SELF HARM

Self-harm is the intentional damage or injury to a person's own body. It is used as a way of coping with or expressing overwhelming emotional distress. An adult at risk may also be neglecting themselves, which can result in harm to themselves.

### A5.6.3 MATE CRIME

'Mate Crime' is when people (particularly those with learning disabilities) are befriended by members of the community, who go on to exploit and take advantage of them.

### A5.6.4 RADICALISATION AND EXTREMISM

The radicalisation of individuals is the process by which people come to support terrorism and forms of extremism and, in some cases, join terrorist groups. Some adults are more vulnerable to the risk of being groomed into terrorism than others. The process of radicalisation can involve:

- Exposure to upsetting images
- Isolation from friends and family
- Psychological manipulation
- Sexual exploitation
- The risk of personal physical harm or death

### A5.6.5 HONOUR MARRIAGE/FORCED MARRIAGE

An honour marriage/ forced marriage is one where one or both of the spouses do not, or cannot, consent to the marriage. There may be physical, psychological, financial, sexual and emotional pressure exerted in order to make the marriage go ahead. The motivation may include the desire to control unwanted behaviour or sexuality.

### A5.6.6 NON-RECENT ABUSE

Non-recent abuse is the term used to describe disclosures of abuse that were perpetrated in the past. Many people who have experienced abuse don't tell anyone what happened until years later, with around one third of people abused in childhood waiting until adulthood before they share their experience.

### A5.6.7 SPRITUAL ABUSE

The **Trustees** share the view of the Evangelical Alliance, **CSS**, and many other specialist agencies that the term "Spiritual Abuse", sometimes suggested as an additional category of abuse, can be opaque and misleading and that it may be more helpful to speak of "emotional and psychological abuse in religious contexts" or of "spiritual coercion and pastoral malpractice". However, the **Trustees** are deeply concerned by the apparent prevalence of such abuse in churches across this country and overseas.

This abuse within a spiritual context may include: manipulation and exploitation, enforced accountability, censorship of decision-making, requirements for secrecy and silence, pressure to conform, misuse of scripture and/or the pulpit to control behaviour, requiring obedience to the abuser, the suggestion that the abuser has a "divine" position and isolation from others. The **Trustees** recognise that spiritual coercion, pastoral malpractice and abuse in all its forms is offensive to God and deeply damaging to the victims.

Where there are allegations of illegal activity, the **Trustees** and/or the **Coordinator**, will report these to the Police or to other appropriate statutory authorities. Recent high-profile cases have also reminded us that church leaders, or others in the local church involved in leadership and pastoral care, can behave in ways that, whilst not illegal, still fall short of the standards expected of a person with pastoral responsibility. This behaviour may range from serious misconduct (including coercion or control) to simply being unwise in relating to others.

The Bible is very clear in the standards of behaviour and character expected by church leaders. Church leaders are given harsh warnings about being overbearing or lording their positions over those entrusted to their care. The **Trustees** will not condone such abuse within **the Charity** or **our Churches** and are committed to taking steps to prevent it. These measures include training and the conduct of annual reviews (preferably “360 reviews”) for the pastors of **our Churches**. Where allegations or concerns are shared with the **Coordinator** or **Trustees**, they will be taken very seriously and will be properly investigated. Where those investigations appear to reveal culpable behaviour, the **Coordinator** and **Trustees** will seek advice and support from external bodies such as the **Charity’s** legal advisers and **CSS** and will not delay in making reports to the Police or to other statutory bodies.

In all cases of potential misconduct, the **Trustees** will make the appropriate pastoral care of victims their primary concern, and in this regard, will seek external advice from professionals such as **CSS**.

We would actively encourage anybody with any concerns or complaints to report them either to the **Coordinator** or via **the Charity’s** separate complaints procedure by emailing [stephen.hatherall@co-mission.org](mailto:stephen.hatherall@co-mission.org)

Abuse does not have to fit solely into any one of the categories, and often more than one type of abuse may be taking place. If you are concerned about an adult at risk experiencing any of these forms of abuse, please contact the **Coordinator**, who will follow the necessary safeguarding procedures.

## A5.7 HOW TO RESPOND TO AN ADULT WANTING TO TALK ABOUT ABUSE OR CONCERNS OF ABUSE

Please see **flowchart** on page 13 above.

Do not delay if you:

- Have a general concern about someone’s well-being (changes in behaviour or living patterns);
- See or hear something which could be abusive;
- Are told that something has happened or is happening to them, or to an adult at risk, which could be abusive

Please pass on all concerns to the **Coordinator** within 24 hours. If they are not available or are implicated in the concern, speak to the **Deputy Coordinator**, Director of Charity Services and/or any of the **Trustees**. If an adult is in imminent danger of harm, contact the police or emergency services without delay and then inform the **Coordinator** or **Deputy Coordinator**.

## A5.8 HOW TO DEAL WITH A DISCLOSURE FROM AN ADULT

If someone discloses abuse directly, remember to:

- **Listen:** Take what is said seriously;
- **Reassure:** Tell them that they have done the right thing by telling you, and that you believe them;
- **Remain calm:** No matter how difficult it is to listen to what is being disclosed. You have been chosen because the person feels able to talk with you. Do not show shock, alarm, disbelief or disapproval;
- **Be honest:** Do not promise full confidentiality or offer false reassurance;
- **Be open:** Do not ask leading questions, such as 'Did she hit you?'. It is not your role to investigate. **Do** ask when the last episode of abuse happened. As soon as you have enough information to concern you, stop probing.
- **Ask:** Request their consent to share information and seek help;
- **Explain:** Tell them that you are going to tell the **Coordinator** (our safeguarding lead) and give them a timescale;
- **Write:** Document everything that the adult at risk has told you, in their own words. You will need to record questions you asked as well as the answers or information given. This should be done as soon as possible after the disclosure and should include the time, date, place and your name and signature. The original document (handwritten and/or typed) must be passed on to and safely and securely retained by the **Coordinator**; You can also use the Safeguarding Incident/Concern Form (*see Appendix 10*) or use our webform: [co-mission.org/make-safeguarding-report](https://co-mission.org/make-safeguarding-report)
- **Report:** Contact the **Coordinator** urgently and always within 24 hours (or, if she is unavailable, the **Deputy Coordinator**) and report the disclosure.  
A safeguarding alert or concern is **not a pastoral issue** in the first instance. All concerns need to be directly reported to the **Coordinator** who in turn may discuss the matter with the relevant church leaders and/or the **Trustees** at an appropriate time.
- **Keep Confidentiality:** The concerns you have should be kept confidential between you, the adult concerned and the **Coordinator**. Based on the nature of the information disclosed, the **Coordinator** may need to inform the **Trustees**, the statutory authorities (such as Adult Social Care Services), the Police, the NHS etc.
- **Never approach the alleged abuser:** Under no circumstances should you carry out your own investigation into the allegation or suspicion of abuse.
- **Seek Support:** The concerns that have been brought to your attention may be deeply upsetting or disturbing, please seek support from a trusted person. It is possible to share your distress while maintaining a level of confidentiality.

### A5.8.1 COMMUNICATION DIFFICULTIES

Be aware that the person's ability to recount their concern or allegation will depend on age, culture, language, communication skills and disability. You may need to ask the person to repeat themselves or to check that you have understood what they said.

### A5.8.2 MENTAL CAPACITY

Within safeguarding, mental capacity is whether or not someone has the capacity or ability to make decisions about themselves and their safety and well-being. There is a fine balance between the individual's rights to autonomy and their need for protection.

Capacity is not a universal concept. It must be applied in a specific context: is the person able to make this specific decision at this particular time? Adults are presumed to have capacity to make all decisions about themselves. Those who work with them should use every endeavour to obtain the decision from the adult. Where an adult lacks capacity or may lack capacity, advice can be obtained from local Adult Social Services if there is uncertainty about an important decision or a situation where harm may occur.

If urgent, the **Coordinator** can make an immediate referral to the relevant local council's Adult Social Care Services for advice.

In terms of the Mental Capacity Act 2005 and the Mental Health Act 2007, adults should be asked for their consent and their wishes and feelings should be ascertained before we take any action. To give consent, they should be able to understand and retain relevant information that is being given to them, believe it to be true and weigh it in the balance, and be able to make a choice. All actions should be based on a presumption of mental capacity and on the consequent right of an adult to make their own choices in relation to their own lives.

### A5.8.3 WHAT IF THE ADULT DOES NOT WANT HELP?

The mental capacity of the adult at risk is vital in deciding what should be done. All actions should be based on the assumption that the individual has capacity and the right to make their own choices in relation to their personal safety and well-being. This includes upholding their right to follow a course of action which others may deem unwise or eccentric, including staying in a situation of abuse.

If the adult at risk does not want help it may still be necessary for the **Coordinator** to inform the police or Adult Social Care Services, who can put a safeguarding plan in place so that, as far as possible, the adult continues to be protected. This is particularly important:

- When the person lacks the mental capacity to make such a choice;
- When there is the risk of harm to others;
- In order to prevent a crime.

It is important that the individual knows where to get the appropriate help and support if they should change their mind.

## A5.9 PROCEDURES WHERE THERE IS CONCERN FOR AN ADULT AT RISK

The **Coordinator** (or, in her absence, the **Deputy Coordinator**) will:

- Discuss any concerns with the individual themselves giving due regard to their autonomy, privacy and rights to lead an independent life.
- If the adult at risk is in immediate danger or has sustained a serious injury, contact the Emergency Services (by phoning 999), informing them of any suspicions.
- Contact the local Adult Social Care Team, who has a statutory responsibility to investigate allegations of abuse, for advice. Alternatively, seek advice from **CSS**.
- Notify as necessary, the responsible church leaders and the Director of Charity Services and/or the **Trustees**.

# APPENDIX 6: SAFEGUARDING CHILDREN AND YOUNG PEOPLE

## A6.1 DEFINITION OF A CHILD

A child is defined as anyone under the age of 18.

## A6.2 THE FOUR CATEGORIES OF STATUTORY CHILD ABUSE

There are four categories of statutory child abuse in the United Kingdom. They are as follows:

### A6.2.1 PHYSICAL ABUSE

Physical abuse 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.

### A6.2.2 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.

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

### A6.2.3 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 s5 Sexual Offences Act 2003.

## A6.2.4 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, maternal 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, medical and educational needs.

## A6.3 CHILDREN WHO MAY BE PARTICULARLY VULNERABLE TO ABUSE

The following categories of children are especially vulnerable. Those who are:

- Disabled or have special educational needs
- Young carers
- Living in a domestic abuse situation
- Affected by parental substance abuse situation
- Affected by mental health issues
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying including online, homophobic, racist bullying
- Living in temporary accommodation
- Live transient lifestyles
- Missing education
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- Vulnerable to extremism or radicalisation
- Involved directly or indirectly in sexual exploitation or trafficking
- At risk of female genital mutilation or forced marriage
- Not English speakers

## A6.4 HARM OUTSIDE THE HOME

As children move from childhood into adolescence they spend increasing amounts of time socialising independently of their families. During this time the nature of young people's relationships that they form in these settings, inform the extent to which they encounter protection or abuse. Here are some examples:

### A6.4.1 ONLINE CRIMES

Children are particularly vulnerable to abuse online. E-safety risks to children include cyber-bullying, the invasion of privacy, accessing inappropriate materials such as pornography, and communicating with strangers (online grooming).

### A6.4.2 CHILD SEXUAL EXPLOITATION

This is a form of child abuse. It occurs where anyone under the age of 18 is persuaded, coerced or forced into sexual activity in exchange for (amongst other things) money, drugs, alcohol, gifts, affection or status. Consent is irrelevant, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and may occur online.

Possible indicators of Child Sexual Exploitation

- Bruising consistent with physical or sexual assault
- Reports from reliable sources that a child has been seen in localities (hot spots) where those involved in harbouring, grooming and abusing children frequent
- Being contacted by unknown adults (male or female) in person, by mobile phone, text, social media, chat rooms or email
- Development of relationships, usually with someone older, who encourages dependence, loyalty and isolation from safe relationships and controls the relationship by manipulation, violence and threats
- Persistent absconding or late return with no plausible explanation
- Being picked up by unauthorised adults in cars
- Returning from absconding looking well cared for, despite having no known base
- Estranged from family
- Acquisition of money or possessions without plausible explanation
- An adult loitering outside the home to meet the child
- Self-harming/offending behaviour
- Alcohol and other drug misuse
- Persistent truanting from schools
- A young person spending long periods of time in 'chat rooms'/given access to inappropriate websites
- Sexually transmitted diseases and/or unplanned pregnancy
- Low self-esteem/self-worth
- Young gay/bisexual male exploring sexuality in an unsupported way

### A6.4.3 DOMESTIC ABUSE

This is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those ages 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial or emotional abuse.

**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 pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

#### A6.4.4 SPIRITUAL ABUSE

The **Trustees** share the view of the Evangelical Alliance, **CSS**, and many other specialist agencies that the term "Spiritual Abuse", sometimes suggested as an additional category of abuse, can be opaque and misleading and that it may be more helpful to speak of "emotional and psychological abuse in religious contexts" or of "spiritual coercion and pastoral malpractice". However, the **Trustees** are deeply concerned by the apparent prevalence of such abuse in churches across this country and overseas.

This abuse within a spiritual context may include: manipulation and exploitation, enforced accountability, censorship of decision-making, requirements for secrecy and silence, pressure to conform, misuse of scripture and/or the pulpit to control behaviour, requiring obedience to the abuser, the suggestion that the abuser has a "divine" position and isolation from others. The **Trustees** recognise that spiritual coercion, pastoral malpractice and abuse in all its forms is offensive to God and deeply damaging to the victims.

Where there are allegations of illegal activity, the **Trustees** and/or the **Coordinator**, will report these to the Police or to other appropriate statutory authorities. Recent high-profile cases have also reminded us that church leaders, or others in the local church involved in leadership and pastoral care, can behave in ways that, whilst not illegal, still fall short of the standards expected of a person with pastoral responsibility. This behaviour may range from serious misconduct (including coercion or control) to simply being unwise in relating to others.

The Bible is very clear in the standards of behaviour and character expected by church leaders. Church leaders are given harsh warnings about being overbearing or lording their positions over those entrusted to their care. The **Trustees** will not condone such abuse within the **Charity** or **our Churches** and are committed to taking steps to prevent it.

*See also A5.6.7 above.*

#### A6.4.5 RADICALISATION AND EXTREMISM

Protecting children from the risk of radicalisation should be seen as part of an organisation's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

In July 2015, the Prevent Duty of the Counter Terrorism and Security Act 2015, came into force. The Prevent Duty places a duty on a wide variety of public bodies (including organisations and childcare settings) to have due regard to the need to prevent people from being drawn into terrorism.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways or settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.



As with other safeguarding risks, staff and volunteers should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Workers should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme. Radicalisation is an increasing concern in relation to security issues and the welfare of children and young people who become involved.

The process of radicalising children and young people frequently involves:

- Exposure to upsetting images
- Isolation from friends and family
- Psychological manipulation
- Sexual exploitation
- The risk of personal physical harm or death.

#### A6.4.6 CHILD ABUSE LINKED TO FAITH OR BELIEF (WITCHCRAFT AND SPIRIT POSSESSION)

The death of Victoria Climbié in London brought to the forefront this deeply ritualistic practice and theology, whereby in some churches it is commonplace to believe that children and sometimes adults are demon possessed. Children and adults who behave differently to the expected norm can quickly become victims of this type of abuse. In many cases there is a lack of understanding or a cultural unacceptance of disabilities. In these cases, it is often wrongly assumed that if someone has a disability that they are demon possessed and the belief is that you can do anything to try to get the demon out even if it causes significant harm. This practice is dangerous and abusive.

#### A6.4.7 FEMALE GENITAL MUTILATION (FGM)

Female genital mutilation is also known as female circumcision or female genital cutting, and in practising communities by local terms as 'tahor' or 'sunna'. It is a form of child abuse which can have devastating physical and psychological consequences for girls and women. Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. In 2003, the Female Genital Mutilation Act tightened this law to criminalise FGM being carried out on UK citizens overseas.

Girls from the Somali, Kenyan, Sudanese, Sierra Leonean, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish and Indonesian communities are at most risk of FGM.

Risk factors and Signs to be aware of;

- Coming from a community that is known to practice FGM;
- Having a mother, sister or member of the extended family who has been subjected to FGM;
- A child being taken back to her family's country of origin at the beginning of the summer holiday. This allows time for her to heal from the procedure before returning to the UK;
- An older female relative visiting from the country of origin who may perform FGM;
- Girls who spend unusually long periods of time in the bathroom.

#### A6.4.8 FORCED MARRIAGE

A person has the right to choose who they marry, when they marry or if they marry at all. Forced marriage is when a person faces physical pressure to marry (for example, threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if they are made to feel like they are bringing shame on their family). Forced marriage is illegal in England and Wales. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place).

- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not).

## A6.5 RECOGNISING SIGNS OF CHILD ABUSE

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered:

### A6.5.1 POSSIBLE SIGNS OF PHYSICAL ABUSE

- Injuries which occur to the body in places which are not normally exposed to falls, rough games, etc.
- Injuries which have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Repeated urinary infections or unexplained tummy pains
- Bruises, bites, burns, fractures, scalds etc. which do not have an accidental explanation
- Aggression towards others
- Fear of parents being contacted
- Improbable and conflicting explanations for injuries
- Fear of returning home
- Withdrawal from physical contact

### A6.5.2 POSSIBLE SIGNS OF SEXUAL ABUSE

- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play
- Sexual activity is documented through words, play, drawing, testimonials or writing
- Use of sexual language
- Knowledge of sex and sex acts beyond their years
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders – anorexia, bulimia
- Poor self-image
- Suicide attempts
- Presenting with STDS
- Presenting with underage pregnancy
- Self-harming
- Victim of child sexual exploitation gangs (grooming)

### A6.5.3 POSSIBLE SIGNS OF EMOTIONAL ABUSE

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging. Also depression/aggression, extreme anxiety.
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/stealing/lying
- Low self-esteem

- Depression
- Poor peer relationships &/or does not join in/has few friends
- Self-harming
- Fear of parents being contacted

#### A6.5.4 POSSIBLE SIGNS OF NEGLECT

- Dirty, unkempt appearance
- Frequent hunger
- Frequent accidents or injuries
- Underweight
- Untreated medical problems
- Sparse hair
- Inadequate clothing
- Child is self-harming/using drugs/alcohol
- Child is angry and aggressive
- Home is dirty and unsafe

### A6.6 HOW TO RESPOND TO A CHILD WANTING TO TALK ABOUT ABUSE

Please see **flowchart** above on page 14.

#### A6.6.1 GENERAL POINTS

- Listen
- Show acceptance of what the child says
- Give reassuring nods or words of comfort ('This is not your fault', 'You are doing the right thing talking to me', 'You are very brave')
- Keep calm - do not overreact
- Do not be afraid of silences
- Clarify or repeat back to check what you have heard, if needed.
- Look at the child directly
- Be honest
- Tell the child you will need to let someone else know. **Never promise confidentiality**
- Explain what you intend to do and don't delay in taking action
- Even when a child has broken a rule, they are not to blame for the abuse
- Be aware that the child may have been threatened or bribed not to tell
- Never push for information (no leading/investigative questions). If the child decides not to tell you after all, then accept that and let them know that you are always ready to listen
- **Do ask when was the last time that the abuse happened**
- **Do not speak to the (alleged) abuser** about what has been disclosed

## A6.6.2 HELPFUL THINGS YOU MAY SAY OR SHOW

- I believe you (or showing acceptance of what the child says)
- Thank you for telling me
- It's not your fault
- I will help you

### DON'T SAY

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure this is true?
- Why? How? When? Who? Where?
- I am shocked, don't tell anyone else!

### CONCLUDING

- Reassure the child that they were right to tell you and show acceptance.
- Let the child know what you are going to do next and that you will let them know what happens.
- Contact the **Coordinator** (or in her absence, the **Deputy Coordinator**) for advice immediately.
- If the child is in immediate danger/at risk (deliberate injury is suspected, there is concern for a child's safety, the child is afraid to return home or they say that they intend to take their own life), then the police/ambulance service/local Children's Social Service (M.A.S.H Team) need to be contacted straight away by the staff member, volunteer or **Coordinator** and the child should be kept with the staff member or volunteer until help arrives.
- Child protection issues warrant a high level of confidentiality, not only out of respect for the child, but also to ensure that information is not released into the public domain, in order to prevent evidence becoming compromised (as the disclosure may become a legal matter in due course). Staff and volunteers should only discuss their concerns with the **Coordinator**, and should report those concerns to the **Coordinator** as a matter of urgency. If the **Coordinator** cannot be contacted the staff member or volunteer may contact the Director of Charity Services or the **Trustees** directly. The person contacted will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.
- Consider your own feelings and seek pastoral support if needed. Dealing with a disclosure from a child can be distressing. Staff and volunteers should recognise their own emotions and seek pastoral support from pastors and/or church counsellors.

## A6.6.3 RECORDING DISCLOSURES BY A CHILD AND REPORTING CONCERNS

All those who work with children in **our Churches** should know how to keep accurate, appropriate written records. All workers (staff or volunteers) should always keep an open mind when recording an observation or a disclosure and distinguish between fact and opinion, considering carefully which details to include or omit. The Safeguarding Incident/Concern Form (**Appendix 10**) may be used as a helpful guide to recording the necessary details and workers can also use our webform to report to the **Coordinator** – see [co-mission.org/make-safeguarding-report](http://co-mission.org/make-safeguarding-report)

Written accounts of the observation or disclosure should be made as soon as possible (within the hour) after the event/concern is raised. They should contain the date, time, place, people present, anything said (verbatim if possible), what borough the child lives in (their home address if possible), what school they go to (if possible) and any action taken. The physical appearance or behaviour of a child at the time of the disclosure or observation should be recorded as factually and accurately as possible. The written record can include observations regarding parents and carers and details of family circumstances, where

possible. Professional opinion should be set apart from factual observations and labelled as such. Judgemental language should be avoided. The written account of the disclosure or observation should be signed by the author. Handwritten and/or typed accounts of the disclosure or observation should be quickly passed to the **Coordinator** for safekeeping as soon as possible.

An immediate (if possible) discussion should then take place between the person with the concern and the **Coordinator** (in person, by telephone, via e-mail or mobile phone text) to reduce the chances of something being missed and/or misinterpreted. Details to be shared with the **Coordinator** will include: all relevant observations, concerns, any action taken already and what action they think should be taken next.

It is important that child protection concerns raised are handled sensitively and only shared with others on a need to know basis. Once the concern is shared with the **Coordinator**, they may seek advice from the local Child Social Services (M.A.S.H Team)/NSPCC Helpline/ **CSS** as to whether a referral is necessary to protect the child.

The **Coordinator** (or, in her absence, the **Deputy Coordinator**) is the first point of contact should a staff member or volunteer become concerned about a child at risk. The **Coordinator** has both special expertise and experience and it is their role to decide whether a referral is necessary to protect the child. They may ask for further information or for the staff member or volunteer to continue monitoring the child to help them make this decision. The **Coordinator** will then inform the **Trustees** and relevant church leaders of a serious safeguarding alert as soon as is practicable.

## A6.7 VISITORS AND VISITING SPEAKERS

The children's group leader should ensure that any adult who is not a ministry team member is never alone with a child in their care.

When booking visiting speakers, leaders should assess any risks and put in place policies and procedures to protect the children in their care. Visiting speakers are not exempt from the **Policy** and procedures that all the **Charity's** staff and volunteers must follow. For example, no child should ever be left unsupervised with a visiting speaker.

We should not have people who are not a part of our organisation at our settings while children are present. If other people will be present besides the leaders or other children's parents, they need to be included on the register for the session (including time in/time out).

*ID should be shown where applicable.*

## A6.8 MISSING CHILDREN

If a worker discovers that a child is missing, they should immediately alert one of the senior workers\* (whether staff or volunteer) on site.

- The senior worker should search inside and outside the building.
- Depending on the child's age, if there is no sign of the child, then the senior worker should contact their parents or carer to establish whether they have returned home.

**If the missing child is agreed 5 years or under, contact the police immediately!**

Once these checks have been made, if the child is still missing the senior worker should discuss with the parents or carer whether it is appropriate to contact the police. In most cases, parents and carers know the child best and will be able to assess whether their child is likely to return of their own accord or whether there are significant concerns for their safety.

The parents or carer are responsible for contacting the police, but the senior worker can contact the police on their behalf if they agree. If the police are called, wait for them to arrive and follow their instructions.

The senior worker must continue to search while waiting for the police to arrive.

If the parents do not want to contact the police, the senior worker should only contact them if they consider the parent's decision to be unreasonable and the child is at significant risk of harm.

**Report to the Coordinator as soon as possible once the concern has been dealt with accordingly.**

\*If the **Coordinator** is on site they should also be alerted.

# APPENDIX 7: GENDER IDENTITY

The following is Safeguarding practice guidance on issues that relate to gender and sexuality in children, young people and adults with care and support needs. This is not a statement on our theological position on this subject but an acknowledgement of our legal and pastoral obligations.

## A7.1 SUMMARY OF THE MAIN ISSUES FOR CHILDREN AND YOUNG PEOPLE

Regardless of our stance on gender identity, our workers may well encounter children or young people who are experiencing what is known as Gender Dysphoria (the condition of feeling one's emotional and psychological identity as male or female to be opposite to one's biological sex). In doing so, they may be at different stages of a journey that may or may not end up with them transitioning from their birth gender to the gender they most identify with.

Children cannot undergo a physical transition until they are at least 18, however, they may be undergoing treatment that is both psychological and hormonal, normally from the age of 16, depending on the diagnosis or pending a diagnosis. Younger children can be prescribed 'hormone blockers' which prevent the onset of puberty. This can only be done with a parent's consent. Most treatments offered at this stage are psychological, rather than medical or surgical. This is because the majority of children with suspected gender dysphoria don't have the condition once they reach puberty. Psychological support offers young people and their families a chance to discuss their thoughts and receive support to help them cope with the emotional distress of the condition, without rushing into more drastic treatments.

Therefore, any child or young person who is experiencing Gender Dysphoria will not have gone through a physical change except for some cases where before the age of 16 they are given hormone drugs to prevent the onset of their birth gender development in puberty. During this time there are both practical issues that can present in church groups and organisations and also pastoral care issues which need to be thought through in order to fulfil our mandate to good safeguarding.

## A7.2 PRACTICAL ISSUES

### A7.2.1 TOILET AND CHANGING FACILITIES

It would be inappropriate for someone who has not undergone gender reassignment surgery to use changing rooms of the opposite sex to their birth gender where there is an open area for dressing/undressing. Where possible individual rooms/cubicles should be provided. For example, many swimming facilities now have mixed gender changing areas with individual lockable cubicles. If you are planning sports activities that require changing, it may be helpful to plan this in advance to avoid the need for changing in church facilities which are not designed for individual privacy. Where a church provides toilets that have a specific male/female designation, it would be useful to make sure that an individual unisex accessible toilet is available too. If a smaller church has individual toilets, then making them unisex is also a positive idea to remove any issues that may arise.

### A7.2.2 RESIDENTIAL TRIPS

As with changing facilities, there are often concerns as to how to arrange accommodation when organising residential trips which include a child or young person with Gender Dysphoria. The sleeping arrangements will need to be thought about before a trip is undertaken. It is possible that the child would, for example, prefer to have a separate room. Each individual case and trip needs to be thought of separately and in depth discussions should happen well in advance with any and all appropriate bodies. A risk assessment will need to be done in advance which takes into account the fact that you are dealing with someone experiencing Gender Dysphoria. Again, it would not be suitable to place someone in a position where they are physically exposing themselves to peers of the opposite physical gender.

## A7.3 PASTORAL ISSUES

It is evident that the struggle for children and young people experiencing Gender Dysphoria can highly impact their emotional health. In some cases, there are also issues such as social withdrawal, anxiety, low mood, self-harm and suicidal thoughts.

During this time, it is essential that the child or young person receive pastoral support without it having an agenda to change or promote their choices either way.

- Confidentiality is paramount. We must not encourage discrimination by making it known that a child or young person is experiencing Gender Dysphoria.
- Keep a record of your conversation with a child and any advice given.
- Encourage them to speak to their parents, if they haven't already done so.
- If their parents are aware, make contact to share with them that their child has confided in you.

Think about the practical advice detailed above to help minimise any social anxiety around activities.

Pastoral care is mainly about giving time and a safe space to listen. Expressing personal views, for or against, should only ever be done at the invitation of the young person whilst always encouraging them to seek parental support.

Should they express thoughts of self-harm or suicide, make urgent contact with the **Coordinator**.

## A7.4 SAFEGUARDING MATTERS TO KEEP IN MIND REGARDING GENDER IDENTITY

### A7.4.1 BULLYING

Bullying is never acceptable regardless of beliefs or values. Should a child or young person with Gender Dysphoria experience bullying it should be dealt with in accordance with our guidelines on behaviour management included in our Code of Conduct (see **Appendix 8, A8.3 Behaviour Management**).

### A7.4.2 PARENTAL PRESSURE

Where a child discloses that their parent/s are becoming abusive in their attitude toward their gender identity we must follow our safeguarding procedures to report their concern.

### A7.4.3 LEGISLATION

The legislation that underpins this topic is the Equality Act 2010.



# APPENDIX 8: SAFE PRACTICE CODE OF CONDUCT FOR WORK WITH CHILDREN AND YOUNG PEOPLE

This code of conduct supports our Safeguarding Policy. References to the **Coordinator** in this code refer to the **Safeguarding Coordinator**, or the **Deputy Safeguarding Coordinator**, for The Co-Mission Churches Trust.

This document covers areas of safe practice in relation to work with children and young people. All workers, whether paid staff members or volunteers, are expected to sign and adhere to the standards of safe practice outlined within this document. These guidelines have been established with advice from Christian Safeguarding Services and reflect current best practice.

Groups not governed by this code are crèches within daytime Bible study groups, where childcare is arranged privately by parents attending the group, who remain responsible for their own children.

## A8.1 SUPERVISION OF CHILDREN'S ACTIVITIES

### A8.1.1 KEY PRINCIPLES

Attempts will be made wherever possible to keep to the following ratio of adults to children, using as a guide the ratios required in regulations governing day-care for under 8's:

CHILD'S AGE	ADULT: CHILD RATIO
0 to 2 years	1:3
2 to 3 years	1:4
4 to 8 years	1:6
9 to 12 years	1:8 (not mandatory)
13 to 18 years	1:10 (not mandatory)

*\*18 year old in full time education*

- No adult will be a lone worker with a child or group of children, except as part of a church's youth mentoring or discipleship programme (*see section A8.2*).
- Where possible the gender of the adults should reflect that of the group.
- Adults who assist occasionally or on a one-off basis who have not been appointed formally using the safer recruitment procedures must be under the care of a worker at all times.
- If for any reason a worker is alone with a child, they should ensure that there is a second adult nearby or there are other workers or groups nearby. Workers will leave doors open when seeing a child individually.
- No person under 18 years of age will be left in charge of any children of any age.
- Children or young people attending a group will not be left alone at any time.
- A register of children or young people attending each group or activity should be kept, and a register of helpers.

- A record should be made of any unusual activity or comments by members, recording what leaders witnessed (e.g. throwaway sexual comments, or particularly difficult behaviour) and leaders may want to use the Safeguarding Incident/Concern Form (**Appendix 10**). The purpose of this is to protect both children and workers. Such records must be passed to the **Coordinator** to be kept in a secure place.
- Any accidents, injuries and/or “near misses” should be reported to the Director of Charity Services as required by the Charity’s health and safety policy. A web-form is available for such reports at: [www.co-mission.org/reportaccident](http://www.co-mission.org/reportaccident)
- When transporting children ensure that it is with the knowledge of the team/leadership and that parental approval has been attained. All drivers must have a valid driving licence, valid insurance and must ensure that seat belt laws are complied with. If it is necessary to transport a child on their own (which should only be in exceptional circumstances) they should travel in the back of the car.

### A8.1.2 YOUNG LEADERS

We are keen to support young people (in Year 11 onwards) in learning about ministry through involvement with children’s work in the church. At the same time, we recognise that young leaders must not be exposed to unreasonable levels of responsibility or risk.

With this in mind, young leaders who are in Year 11 or above will not be placed in a role that will require them to complete a **DBS check**. They cannot be counted into the worker-child ratios. They will however be asked to sign the online Safe Practice Code of Conduct for Work with Young People. Young leaders will be supported at all times in their roles by adult leaders.

### A8.1.3 TODDLER GROUPS

During toddler group sessions run by any of our Churches, parents or carers are entirely responsible at all times for the children in their care.

Any concerns about children attending these groups should be referred to the **Coordinator**.

### A8.1.4 BABYSITTING ARRANGEMENTS

If babysitting services are offered to parents by any of our Churches, e.g. for a Christianity Explored course, then the babysitters will need to have successfully obtained an Enhanced **DBS** certificate to work with children.

## A8.2 MANAGING TOILETING WITHIN PRE-SCHOOL SUNDAY SCHOOL CLASSES

Within our Churches, we are clear that for crèche-age children, leaders do not provide intimate care, such as nappy changes.

In crèche, if a child requires a nappy change, leaders contact the parent/carer (via text message) who then come to the child and provide the necessary care.

Once children move into Sunday school the procedures around providing intimate care need to be just as consistent across the entire team of leaders. Leaders need to be operating to clear guidelines in this area both to safeguard the children and protect themselves.

The following guidelines have been established with advice from Christian Safeguarding Services and reflect current best practice.

### A8.2.1 CHILDREN AGED UNDER 3 YEARS:

- The approach to managing toileting in children under 3 years will be consistent with that of crèche.
- Leaders will not provide intimate care to these children.
- Children who are not fully toilet trained should therefore attend Sunday school wearing a nappy/pull up.
- If a child in this age group requires a nappy change or to go to the toilet, a parent/carer will be contacted (via text message) and should then come and assist with taking their child to the toilet as necessary.

### A8.2.2 CHILDREN AGED 3 AND 4 YEARS:

- Any help with toileting in children aged 3 and 4 years should be provided with the knowledge and agreement of the child's parents/carers.
- When taking children to the toilet, leaders should always consider the dignity of the child and ensure that as much privacy as possible is given.
- Children should be encouraged to use their own toilet cubicle.
- Leaders should avoid doing things for the child that the child is able to do for themselves.

If a parent/carer prefers to assist their own child with toileting, they should advise the group leaders of their preference. Leaders should then contact the child's parent/carer (via text message) as necessary.

## A8.3 BEHAVIOUR MANAGEMENT: GENERAL PRINCIPLES FOR SUNDAY SCHOOL TEACHERS

### A8.3.1 BASIC PRINCIPLES

#### Discipline is a team issue

- Each member of the team has a part to play.
- Agree roles and responsibilities.
- Identify each other's strengths.
- Be consistent, loving and predictable (the same behaviour produces the same consequences).
- When disciplining a child over poor behaviour, do not do so in a way that humiliates and do not do so one to one behind closed doors.
- Never use physical discipline

#### Discipline is a planning issue

- Be aware that a poor lesson can result in poor behaviour, because the children are bored and frustrated. It does not follow that poor behaviour is always caused by a poor lesson.

#### Discipline is a gospel issue

- We work in a context of continual conversation with parents. We want to be speaking to parents about their children, irrespective of their child's behaviour. This acknowledges that we only teach because they have commissioned us to teach their children the Bible for an hour a week.
- Poor discipline prevents others from hearing God speak. That should be motivation enough to act.
- Seek to encourage with positive affirmation both the whole class and individuals, publicly and privately, whenever possible.
- Offer the child a way out by them changing their behaviour.
- Model forgiveness.

### A8.3.2 MANAGING POOR BEHAVIOUR

1. Explain to the child how their behaviour is falling below the standards you expect.
2. Warn the child that if behaviour continues to be poor, they will be asked to sit out from the class for a period of time.
3. The child should be sat in timeout for the duration of an activity or game. They may not participate in any way while they are there. They are expected to listen. Parents must be informed if this happens, as soon after the lesson as possible.
4. Warn the child that if after re-joining the class, the behaviour continues to be poor, they will return to timeout for a longer period of time.
5. If the behaviour makes it difficult to continue the lesson, then one teacher needs to collect a parent from the Church to remove the child. Explain the reasons for this as a final warning, before you take this action. Alternatively, one teacher should take the child to the children's work coordinator to talk privately to the child in an open place.
6. Exclusion from children's work for a week would be appropriate for continued disruption of the class.

### A8.3.3 GUIDELINES ON TOUCH

- Keep everything public.
- A hug in the context of a group is very different from a hug behind closed doors.
- Touch should be related to the child's needs, not the worker's.
- Touch should be age-appropriate and generally initiated by the child rather than the worker.
- Avoid any physical activity that is, or may be thought to be, sexually stimulating to the adult or the child.
- Children have the right to decide how much physical contact they have with others, except in exceptional circumstances when they need medical attention.
- Team members should monitor one another in the area of physical contact. The team should be free to help each other by pointing out anything which could be misunderstood.

## A8.4 YOUTH 1:1 MENTORING AND COMMUNICATIONS POLICY

### A8.4.1 ONE TO ONE MENTORING / PASTORAL CARE

If a worker is working with young people as part of a church mentoring and/or discipleship programme (for example, reading the Bible one to one with a young person of the same gender as part of the church's youth work) or as part of a pastoral care team:

- The parents of the young people involved are required to provide their agreement (by letter or by email) that the one to one meetings may take place.
- One to one meetings should only be held in agreed places (for example in church or in cafes), and should be in view of other people.
- A one to one meeting should have an agreed start and end time and the young person's parents should be notified that a meeting is taking place and where it is being held.
- A basic record should be kept of dates of one to one meetings and any text messages or emails.
- Appropriate boundaries should be put in place in regard to times and demand, i.e. not phoning or texting late at night, etc.
- A written record should be kept of issues/decisions discussed at meetings.
- In the event of any pastoral concerns a leader may have about an individual member, a leader should take the issue to the parents or church leaders.

### A8.4.2 COMMUNICATIONS POLICY

This policy seeks to clarify and set the boundaries for communication between the youth leaders and members at our Churches. All communication between youth leaders and members occurs on a strictly same sex basis – i.e. male leaders to male members and female leaders to female members (except where mass communication e.g. group emails/Facebook messages sent out).

The context for all communication with members is that parents are responsible for their children rather than the youth leaders. At the beginning of each term a letter is sent to all parents explaining dates of events and parental consent is requested. All communication in this policy is assumed to be between leaders and members only.

To prevent relationships being misunderstood by a member or an outsider, leaders will not send more than five texts, emails or Facebook messages to one individual in any given week. All communication between leaders and members is to occur between the hours of 8:00am and 8:00pm. In circumstances where leaders are texted or contacted by members outside of these times, the leader will not reply until the following morning except in cases of emergency. The only exception would be in the evening of a youth event (for example a social, which may not finish until 10pm) where communication asking for practical details can be replied to.

In all communication, leaders are encouraged to be above reproach and exercise wisdom to protect both themselves and the members from accusation or incrimination of any kind. Rather than hinder communication, this policy is intended to encourage youth leaders to communicate appropriately.

The table below outlines the current methods of communication:

	GROUPS FOR AGES 11-14 EG. PATHFINDERS	GROUPS FOR AGES 15-18 EG. CYFA
Text Messaging/ WhatsApp	None	<ul style="list-style-type: none"> <li>Used to confirm details of attendance at social events and meeting one to one with members</li> <li>Occasionally used to send birthday messages, encourage with Bible verses. Same gender only.</li> <li>Not used for conversations or discussions of any nature.</li> <li>If using WhatsApp, use group messaging where possible</li> </ul>
Mobile Phone Calls	None	<ul style="list-style-type: none"> <li>Used only to confirm expected attendance at an event or a one-to-one meeting.</li> <li>e.g. If leaders and members are at a venue waiting for another member's arrival, the leader may call to ask where they are.</li> <li>Not used for any other communication or personal/pastoral work.</li> </ul>
Landlines	None	<ul style="list-style-type: none"> <li>Used to confirm attendance at events or arrange meetings for one to ones where members do not have a mobile phone.</li> </ul>
Facebook Instagram	<p>None</p> <p>Leaders are asked not to be Facebook friends with members of groups in this age bracket.</p>	<ul style="list-style-type: none"> <li>Groups created to communicate details of events, confirm details of and attendance at events.</li> <li>Only group members are allowed to be members of the group. The youth leader is the sole administrator of the group. The Facebook group is closed, meaning that no-one outside the group has access to information or communication contained within the group.</li> <li>Leaders will occasionally communicate via personal message on Facebook or via the members Facebook wall to confirm details of meeting for one to ones or to encourage with Bible verses etc. Same gender only.</li> <li>If leaders and members are friends on Facebook, members will have access to the whole of the leader's Facebook profile. The leader has to be above reproach in their Facebook behaviour. The member will have access to some content of the leader's other Facebook friends.</li> <li>Facebook communication has proven to be the best form of communication with members and allows insight into one another's lives.</li> </ul>

Twitter	None	<ul style="list-style-type: none"> <li>• Twitter accounts are generally not used by teenagers. However, where deemed beneficial, Twitter may be used as further aid for communicating information to members mid-week.</li> <li>• All leaders have access to username and password for Twitter account but the lead use of this Twitter account will be the overall group leader. Other leaders wishing to tweet may do so from time to time.</li> <li>• The Twitter account will be set to Private so that only approved people can follow the account.</li> <li>• Users should be aware that tweets are stored indefinitely on multiple online search engines and that they are publicly available to members of the Press or anyone referred to.</li> </ul>
Other Social Networking e.g. Snapchat, Tiktok, etc	None	<p>None.</p> <p>NB. If leader profiles are public, then the content must be above reproach at all times.</p>
Email	<ul style="list-style-type: none"> <li>• May be used to confirm 1:1s only if parents are cc'd. Copies of emails are kept.</li> <li>• Parents are informed in emails about details of advertised events.</li> <li>• Where details change or new events are arranged, parents will be informed via email.</li> </ul>	<ul style="list-style-type: none"> <li>• Email is used for administrative purposes only, e.g. to confirm details of and attendance at events.</li> <li>• Copies of emails are kept.</li> <li>• No pastoral issues are discussed via email.</li> <li>• Parents will be copied into group youth emails sent by leaders.</li> </ul>
Chat Rooms and Online Gaming	None	None

### A8.4.3 YOUTH: SOLVENTS AND ILLEGAL SUBSTANCES.

- Workers should be alert to possession and use of illegal substances.
- If a worker becomes aware a child or young person may be abusing solvents, they should be encouraged to seek professional help from their doctor or a counsellor specialising in this area.
- It is a criminal offence to allow anyone attending an activity run by our Churches to supply illegal drugs or use them on the premises.
- We have a zero tolerance policy on all illegal substances.
- All youth attending any of our services and events must be made aware of our zero tolerance approach to illegal substances.

For the child involved:

- Ask them to stop, warning them of the consequences if they do not (e.g. ban from the group).
- Inform parents/carers if the young person is under 16 years.
- Inform the parents/carers if the young person is over 16 years (with the young person's permission).
- Discuss with the young person the proposed course of action, particularly if they re-offend (e.g. possibly informing the police).
- Write down the content of any discussion with the young person, including the action taken and keep this in a secure place and inform the **Coordinator**, if they have not already been informed.

### A8.4.4 YOUTH: TOBACCO AND ALCOHOL

- There is a smoking ban in all enclosed public spaces throughout the UK and a no-smoking policy should therefore be enforced within any buildings used by our Churches.
- From October 2014, the ban on smoking was extended to smoking in a vehicle with children present (in England and Wales).
- It is also illegal for anyone under the age of 18 in England and Wales to be sold cigarettes (or other products like roll-up tobacco and cigars) over the counter or at a vending machine.
- There are also strict regulations on the sale and consumption of alcohol where children and young people are concerned. No alcohol will be sold at our events to any person under 18 years. Proof of age will be requested if a worker is unsure whether it is legal to sell an individual an alcoholic beverage.
- Workers do not have the right to confiscate alcohol found in a young person's possession but they can enforce a no-alcohol policy.
- There may be occasions where it is felt necessary to inform parents /carers that a child/young person has been drinking, particularly if they are under the influence or that there are concerns for their health or safety. This should be discussed with the Safeguarding Lead at the event and/or the **Coordinator**.

*An electronic copy of this Code of Conduct must be signed, dated and submitted to (and retained by) the Coordinator by all staff and volunteers who work (via 'Regulated Activity' or via 'infrequent contact') with children throughout our Churches and who possess a valid DBS certificate to do so.*



# APPENDIX 9: SAFE PRACTICE CODE OF CONDUCT FOR WORK WITH ADULTS

Those working within **the Charity** who work with adults in any context, including adults at risk of abuse, will:

1. Ensure that they understand the policies, procedures, systems, guidelines and risk assessments etc. that are provided and will ensure that they are implemented
2. Attend safeguarding training on the frequency stipulated in the CMCT Safeguarding Policy
3. Work in a transparent and responsible manner that ensures that they are accountable to the church leaders and **the Trustees** and that they are open to challenge
4. Ensure that their conduct embraces their responsibility for the safety, and the prevention from harm, of those with whom they are working, training and/or serving
5. Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about people who may pose a risk to them
6. Refrain from any abuse of their power or position and will always seek to act in the best interest of the individual
7. Be mindful both of the spiritual context in which they work and that they may have spiritual authority (whether by role, age, position or experience etc.) over those they are training, serving or working with and therefore take particular care to refrain from any coercion, bullying, pastoral manipulation or pressure to conform
8. Treat them as individuals and with respect and dignity
9. Ensure that support is other person-led and that their views, wishes and choices are respected
10. Promote and seek to ensure appropriate behaviour towards one-another
11. Ensure that situation and person appropriate boundaries are maintained
12. If working in groups, seek to ensure that necessary behavioural and interpersonal boundaries are clearly explained and consistently implemented
13. Ensure that any physical contact is other person-led
14. Ensure that proportionate physical intervention is only used as a last resort to ensure the safety of an individual or the group
15. Not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory (etc.) language or behaviour with them
16. Act with fairness and treat each person equitably; avoiding discrimination or favouritism
17. Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding
18. Report any concerns to the **Coordinator**
19. Report any wrongdoing by other workers (whether paid or unpaid), including behaviour and/or words which may appear "odd" or concerning, to **the Coordinator** or to **the Trustees**.

# APPENDIX 10: SAFEGUARDING INCIDENT/ CONCERN FORM

*This form may also be completed online at [co-mission.org/make-safeguarding-report](http://co-mission.org/make-safeguarding-report)*

Church		
<b>About this form and the person completing it</b>		
Your Name	Your Mobile Number	Your Email
Department/Group/Ministry Area		Date completed
<b>About the person / people we are concerned about / involved in the incident</b> If an allegation, the details of the person making the allegation		
Their Name(s)	Their DOB	Their Address
Are you reporting an Incident/Disclosure/Concern (delete as appropriate)		
<b>If an allegation, details of the person accused</b> Please provide as much information as possible or necessary to identify them		
<b>Details of the incident / disclosure / concern</b> What happened / what was said / what you noticed etc.		

Context of the incident / disclosure / concern Where / when / who else was present etc.	
Date of incident / disclosure	Time of incident / disclosure
Immediate action taken to ensure immediate safety	
Other action taken or advice sought	
Your signature	

**Send this to the CMCT Safeguarding Coordinator**

The Co-Mission Churches Trust,  
577 Kingston Road,  
London  
SW20 8SA

Email: [safeguarding@co-mission.org](mailto:safeguarding@co-mission.org)

Phone: 07778 533463