

*The*  
**United  
Reformed  
Church**

# GOOD PRACTICE 6

**Safeguarding  
for everyone**



# Safeguarding in the URC

The URC is committed to safeguarding in every area of its life and ministry.

## WHAT?

Policy Statement (General Assembly 2021)

- Create and maintain a safe environment for everyone
- Respond promptly to any form of abuse or neglect
- Seek to prevent abuse from occurring.

## WHY?

- Theology, beliefs and values
  - God's concern for justice and care for the vulnerable
  - The Church's call to live out a 'ministry of caring, forgiving and healing love'
- Legal, regulatory and Charity Commission requirements.

## WHO?

- Safeguarding is everyone's responsibility
- Local churches, synods and General Assembly working together
- People in specific roles will have additional responsibilities.

## HOW?

- Safeguarding Strategic Plan
- Good Practice 6
- Training
- Templates for policies / forms
- Links to additional and specialist resources
- Giving a voice to those who have experienced abuse.





# Letter from the General Secretary

As the resurrected Jesus stood before his disciples, his words were: 'Peace be with you'.

Peace is a foundational Christian practice. Peace is not the absence of violence or oppression. It is about living well with one another; it is about integrity and honesty; it is about seeking the common good; it is about seeking the thriving of all as beloved creatures of God. This is all contained within the sense of the biblical word 'Shalom' – peace. This is what Jesus desires for his disciples. This is what Jesus still desires for his disciples – and for all creation.

It is easy to think of safeguarding as 'yet another thing to do', or as 'yet more compliance'. It is not. It is foundational to what it is to be followers of Jesus. It is about seeking the flourishing of all. It is about taking an active stand against that which degrades, dehumanises, and leads to the opposite of peace and fullness of life. Safeguarding is an expression of the gospel of Christ's resurrection.

In the United Reformed Church, no individual congregation is an Island. We are all interconnected and interdependent upon one another as valued parts of the body of Christ. Taking the promotion of resurrection peace through safeguarding seriously can feel demanding. It is vital to remember that this is something we do together, as Christ's body. There is always someone to turn to for help, guidance, and support. If you are feeling unsure about how best to approach something, please pick up the phone or drop a line to your Synod Safeguarding Officer – they will only be too glad to help.

As something gospel shaped, safeguarding is a labour of love. It has been for those who have worked hard to prepare *Good Practice 6*, and it is for the many of you who through your engagement with safeguarding are promoting peace and flourishing. I want to say thank you to you all for the vital work you do – it is appreciated by many, far more than you will realise.

As the Body of Christ, the promotion of peace and flourishing is part of our fundamental call to discipleship. Safeguarding is therefore something that each one of us is called to take responsibility for. My prayer is that the wisdom *Good Practice 6* contains, and our faithfulness to our call to discipleship, will lead us to becoming an ever safer Church, in which peace and flourishing becomes a reality all experience.

Yours in Christ,

**John Bradbury**  
General Secretary of the United Reformed Church

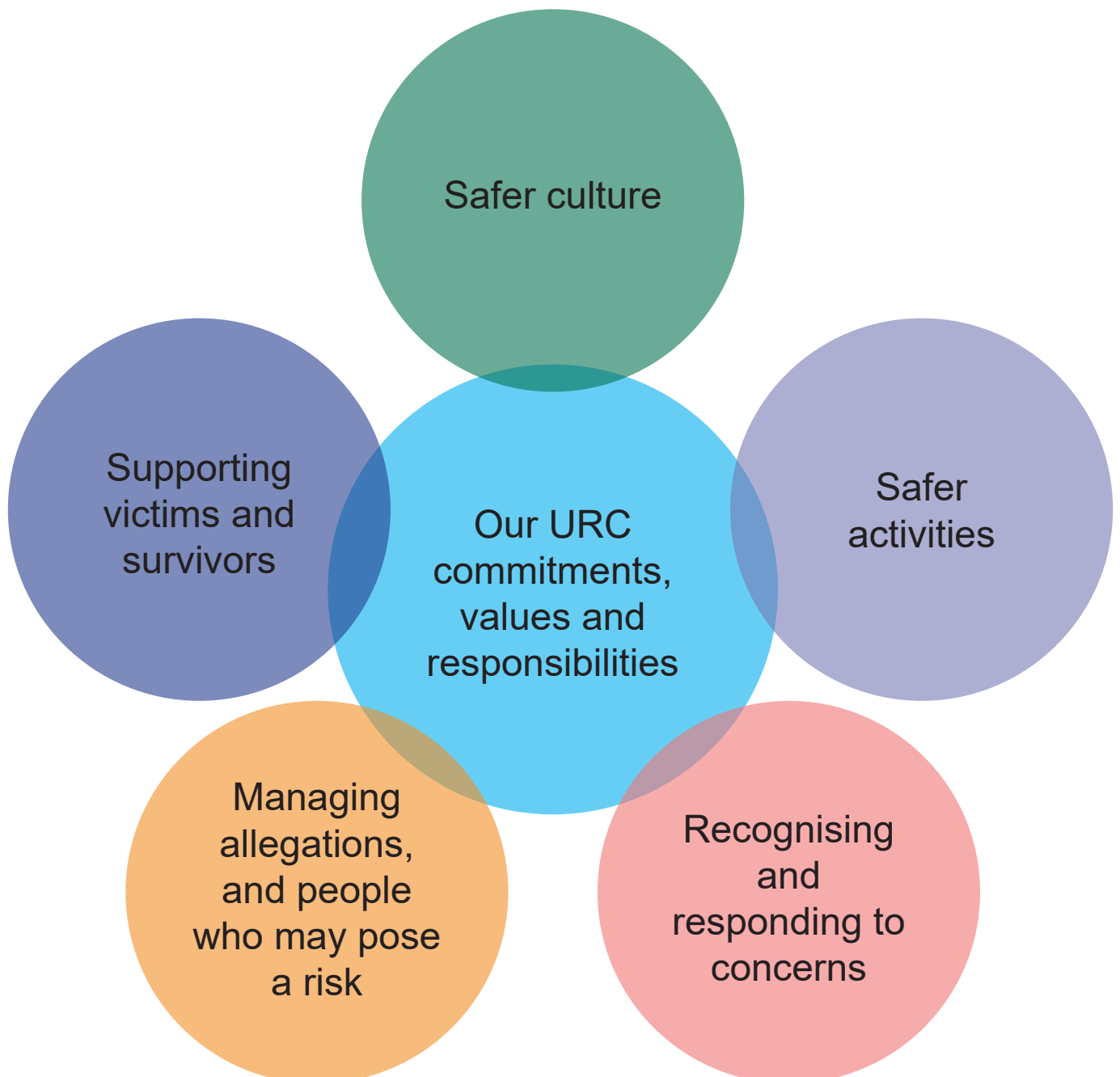




# Finding your way around the guidance

Good Practice 6 is structured around this model:

## Safeguarding in the URC



## Chapters 1-6

### Chapter 1

'Our URC commitments, values and responsibilities' outlines the foundations underpinning all URC safeguarding practice.

### Chapter 2-3

Chapter 2 'Safer Culture' and Chapter 3 'Safer activities' outline practices and procedures which can help to reduce the likelihood of harm occurring.

### Chapters 4-5

These chapters provide guidance on responding appropriately when safeguarding concerns and allegations occur.

### Chapter 6

Chapter 6 considers the needs of victims and survivors, including creating a supportive culture and responding to the individual experiences of those who have experienced abuse.

## Resources

There are links throughout the guidance to further resources. These provide a range of materials including additional guidance on some topics, forms, templates, and links to external resources.

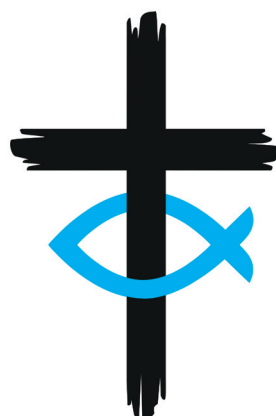
## Who the guidance is for

*Good Practice 6 (GP6)* provides information relevant to people with many different roles in the URC. Some material will only apply to certain roles but even if a section does not directly apply to your role it can still be helpful to know what other people are doing. *GP6* is not just there for when things 'go wrong' but is more of a handbook for all to use to help build a safer culture across the URC.

## How to use the guidance

Think about how the following questions could apply to your particular setting and role:

- How can we use *GP6* to help embed good practice in the regular routines of our church life / our work to help prevent harm occurring?
- How can we use *GP6* to improve the way we respond to safeguarding concerns, to both comply with our legal responsibilities and provide meaningful pastoral care for those involved?
- How can we use *GP6* to better support those who have experienced harm or abuse?



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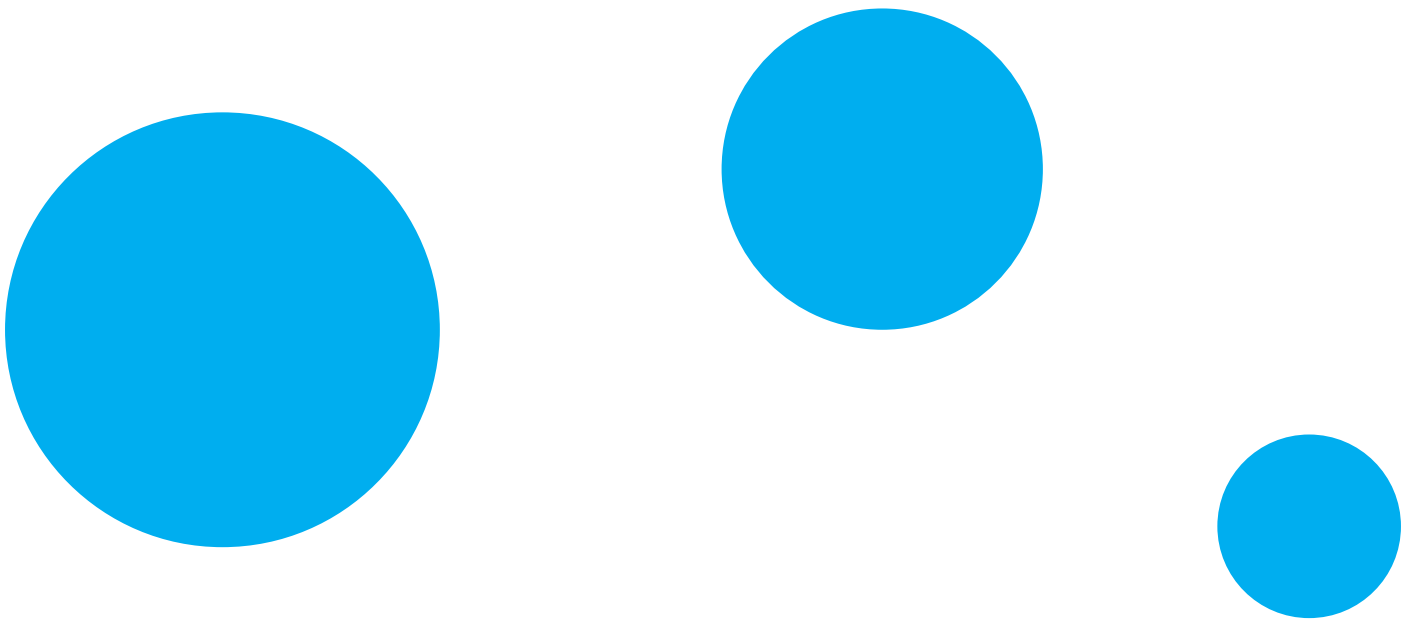
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# Chapter one

## Our URC commitments, values and responsibilities

# 1.1 URC Safeguarding Policy Statement (General Assembly 2021)

The United Reformed Church (URC) is committed to safeguarding in every area of its life and ministry. Safeguarding is the action taken to promote and protect the wellbeing and human rights of individuals. This means we will:

- Do all we can to create and maintain a safe and caring environment for all people
- Respond promptly and effectively to any form of abuse and neglect, including reporting abuse to statutory agencies as necessary
- Seek to prevent abuse in any form from occurring.

We will seek to identify individuals who may pose a risk to others and take necessary actions to minimise risk while supporting these individuals in our communities when safe to do so. The URC confirms that safeguarding is the responsibility of everyone: to prevent abuse and neglect of children, young people and adults; to act upon concerns of abuse; and to support the wellbeing of each person within all communities in which the Church is placed. Safeguarding is a requirement and a duty in all Councils of the Church. Safeguarding in the URC is supported with relevant policies, practice, guidance and training. The Church acknowledges that the wellbeing of the child or adult who is experiencing or is at risk of experiencing abuse, harm and neglect is paramount, and it will always act in their best interests, in line with national legislation, relevant statutory guidelines and good practice guidance. The United Reformed Church believes that all people have the right to be and feel part of this community, regardless of age, disability, gender reassignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation. We will operate in line with the Human Rights Act 1988, the 1989 United Nations Convention on the Rights of the Child, and the Equality Act 2010.

**The United Reformed Church (URC) is committed to safeguarding in every area of its life ...**

## Commitments

The URC will adhere to the policy statement above by committing to:

- Promote safe and healthy cultures in which good practice standards in safeguarding are updated and disseminated
- Ensure everyone in a position of trust is carefully recruited / selected / appointed / elected and trained in safeguarding children and adults at risk
- Respond promptly and appropriately to any safeguarding allegation or concern (including reporting any allegations to statutory agencies), including those who may pose a risk to children, young people or adults at risk
- Care pastorally for all children and adults at risk, and all those who have experienced abuse in the past
- Ensure that all those who pose a risk to children, young people or adults at risk, and those who are the subject of allegations, receive appropriate pastoral care and supervision
- Exercise informed vigilance about risks in all forms of abuse and neglect
- Work together with other denominations, statutory agencies and voluntary organisations.

The full statement (paper T4) and further details can be found at: [www.bit.ly/urcbor2021](http://www.bit.ly/urcbor2021)

## 1.2 Why safeguarding matters

Safeguarding is part of the URC's mission. Churches and places of worship reflect society, with children and adults sharing together in the activities taking place in and around them. We journey alongside those who have been abused and those who have abused, and we all go forward together as one body. The challenge for the URC is to foster a community of care where everyone – children, adults and, especially, those in greater need – finds in the Church a place where they feel safe and respected and can seek pastoral care and support when needed.

### URC theology of safeguarding

Safeguarding involves all of us. Safeguarding is integral to the mission of the United Reformed Church and a part of its response and witness to the love of God in Jesus Christ. Safeguarding is underpinned by Jesus' command to his followers to "love one another as I have loved you" (John 13:34-35). Because Jesus' ministry is continued in and through the Church, the whole people of God called and committed to his service and equipped by him for it, it is our call to "to live out, in joyful and sacrificial service to all ... that ministry of caring, forgiving and healing love which Jesus Christ brought to all whom he met" (*The Manual A 11*). As such, we, the Church, aspire to be a loving community, offering a welcoming environment in which people can flourish, safe from harm.

Safeguarding is a theme which runs throughout the whole Bible, where God commends to his people those who are of special concern: widows, orphans and strangers. With over 2,000 references concerning matters of justice and injustice in the Bible, God shows Godself as one who cares for the vulnerable: in Psalm 46 God provides safety and security and stands against domination, exploitation and abusive power; in Psalm 121, God is the keeper, the 'safeguarder' of Israel. God wants the very best for all his people. The theological imperative of God, then, is the safety of all his children.

Jesus, too, had a very clear message about the most vulnerable people. The Good News is about human flourishing in its deepest sense. It matters so much to God that human beings should flourish that God sent Jesus to die for us. Safeguarding is affirmed in the theological idea of the word 'Salvation', where the root of the word is safekeeping. We believe that God wants human beings to flourish and grow in loving relationship with one another and with God. John's Gospel uses the image of abundant life for this: "I am come that they may have life and have it abundantly" (John 10:10). Jesus says that abuse in all its forms at its heart denies people that opportunity to flourish.

Therefore, the ways in which Christians relate to one another and others are vital for both human flourishing and the witness of the Church. In Matthew 18, when the disciples ask who is the greatest in the kingdom of heaven and Jesus places a child in the middle of them, his reply about change and becoming like little children shows us the strength of his teaching about the most vulnerable in our midst. Jesus teaches that, in the Kingdom, we are judged by what is in our hearts and how we put our faith into action, rather than knowing what we should do, like the Pharisees who knew the Law but failed to put it into practice. Power over others does not play a part in the Kingdom. As Christians, we are called to imitate that radical hospitality which Jesus showed through his incarnation by affirming the dignity and worth of all people in our Church structures, policies, processes and patterns of relating. Safeguarding is one aspect of this. Matthew 18 also reminds us that we will need to challenge bad behaviours and abuse which prevent flourishing and have the confidence to report those we have concerns about, knowing that we do so in a safe environment.

**"love one another  
as I have loved you"  
John 13:34-35**

We have a wealth of skills and experience in our Designated Safeguarding Lead, our Synod Safeguarding Officers and the URC Safeguarding Committee, whose professional advice we do well to heed as they guide us. We are called as witnesses to the God who offers healing, hope and life in all its fullness through the Good Shepherd who seeks to protect us and helps us to protect others.

Another aspect of our witness is advocacy. Throughout the Bible, God is attentive to the cries and needs of those who are vulnerable and commands that his people are similarly attentive. This must always lead to action. Advocacy is about giving voice to others and their concerns. One way we do this is by making good use of our opportunities and using our own voice to speak up on behalf of others. Proverbs 31: 8 gives us the imperative to do this: “Speak out for those who cannot speak, for the rights of all the powerless.”

Another way is to give a platform to others to enable and empower their voice to be heard because it deserves to be heard. Victims and survivors have their own unique and personal experience, which can be effective in advocacy for others as well as pursuers of justice in their own right, if they are empowered to communicate this. With this intergenerational understanding from Proverbs, safeguarding becomes a partnership: not something done to people who are vulnerable, or about them, but with them. Therefore, speaking up for them and alongside them is a deeply Biblical principle as well as God’s wish for the Church; not only that we are safe, but we all work together for safety for all people.

## **Legal and regulatory requirements**

In addition to legislation relating specifically to protection of children and adults at risk, other legal requirements in areas such as data protection, human rights and equality must also be considered. Relevant legislation and statutory guidance will be highlighted in each of the following chapters.

### **The Charity Commission**

Within England and Wales, every local church falls under the regulatory direction of the Charity Commission regardless of whether or not they are registered with the Charity Commission. Synod Trust companies and the URC Trust are also subject to regulation by the Charity Commission.

All charities must undertake these five actions<sup>1</sup>:

1. Identify and manage risks
2. Have suitable policies and practices in place
3. Carry out necessary checks
4. Protect volunteers and staff
5. Handle and report incidents appropriately.

The Charity Commission makes clear that having safeguards in place not only protects and promotes the welfare of children and adults at risk, but also enhances the confidence of trustees, staff, volunteers, parents / carers and the general public in the Church, protecting its reputation and helping it to fulfil its mission of encouraging all in their journey of faith.

1 [www.bit.ly/safeguardingforcharities](http://www.bit.ly/safeguardingforcharities)

## **The Scottish Charity Regulator (OSCR)**

For churches in Scotland, OSCR places a similar emphasis on safeguarding. Guidance states that ‘charities should have the appropriate mechanisms in place to make sure that a safe environment is created for staff, beneficiaries and volunteers’.<sup>2</sup>

## **Charity regulation for the Channel Islands and the Isle of Man (Crown Dependencies)**

While the legal and regulatory framework is defined slightly differently in these jurisdictions, the same general principles as in Scotland and in England and Wales apply.<sup>3</sup>

## **Insurance**

Failure to follow relevant legislation, policies and guidance may invalidate a church or synod insurance policy if a significant incident occurs.

# **1.3 The challenge of safeguarding**

We cannot avoid these issues just because they are difficult. In our current social context, failure to take care over safeguarding can cause real reputational damage not only to the church but also to the Gospel message of love and acceptance. This guidance sets out some of the ways churches large and small can ensure they are seen to proclaim the Gospel message and protect and promote human dignity and also protect the reputation of the whole church.

It is recognised that small churches in particular can find it difficult to manage expectations regarding safeguarding practice. Mutual support and partnerships between churches are one way to help overcome some of these challenges; further guidance in this area will be made available.

# **1.4 Division of responsibilities**

Who is responsible for safeguarding in the URC? Safeguarding is everyone’s responsibility.

The different parts of the Church are interrelated and co-dependent: Assembly and its staff, Synods and local churches. The URC is a small denomination, where it is common to find people who are related to one another, who have other strong non-familial connections, and where individuals may hold more than one position of responsibility. Therefore, the risks and likelihood of conflicts of interest are potentially high, and the need for clarity of responsibilities is essential.

Additions to URC Structure and Rules of Procedure (sections B and C of the Manual) were approved by General Assembly 2021 to “make explicit where various responsibilities lie”.<sup>4</sup> These are listed below and further guidance on how this applies in practice is provided in the ‘Safer Culture’ section.

## **Local churches**

Primary responsibility for safeguarding in local churches is exercised through Church Meetings and Elders’ Meetings.

2 [www.bit.ly/3QdfOjq](http://www.bit.ly/3QdfOjq)

3 Isle of Man [www.gov.im/charities](http://www.gov.im/charities); Guernsey: [www.guernseyregistry.com/charities](http://www.guernseyregistry.com/charities); Jersey [www.charitycommissioner.je/for-charities/guidance-and-legislation/](http://www.charitycommissioner.je/for-charities/guidance-and-legislation/)

4 Paper T2: [www.urc.org.uk/wp-content/uploads/2022/01/book-of-reports-2021.pdf](http://www.urc.org.uk/wp-content/uploads/2022/01/book-of-reports-2021.pdf)

Additions to the Structure agreed in 2021	
Functions of Church Meeting:	Functions of Elders' Meeting:
a) To appoint a Church Safeguarding Coordinator. b) To adopt and promote implementation of safeguarding policy in line with General Assembly recommendations. c) To receive regular safeguarding reports from the church Safeguarding Coordinator.	a) To satisfy themselves that all necessary procedures are in place to achieve the aims of the church's safeguarding policy. b) To adopt best safeguarding practice for all church activities. c) To report to Church Meeting and to Synod. d) To report to the building trustees, charity regulators and insurers when advised to do so by the Synod Safeguarding Officer.

## Synods

Synods support local churches with their safeguarding responsibilities. They do so by:

- Assisting with the development of safeguarding policy
- Assisting with the appointment of, and offering support to, Church Safeguarding Coordinators
- Arranging and delivering training in accordance with the Safeguarding Training Framework
- Monitoring safeguarding implementation through the annual safeguarding return.

Additions to the Structure agreed in 2021	
Functions of Synod:	
a) To appoint a Synod Safeguarding Officer or equivalent. b) To have oversight of, and to support, monitor and report safeguarding related activities and issues within local churches, and among ministers, officers and staff of the Synod.	c) To take all necessary powers and actions positively to promote implementation of good practice in accordance with the safeguarding policy statement adopted by the General Assembly. d) To adopt best safeguarding practice for all its own activities and events.

## General Assembly

General Assembly supports synods and local churches by overseeing the development and implementation of policy and best practice in safeguarding.

Additions to the Structure agreed in 2021	
Functions of General Assembly:	
a) To appoint a Designated Safeguarding Lead. b) To have oversight of local churches and Synods, monitoring practice. c) To adopt a safeguarding policy statement and procedures for use throughout the whole United Reformed Church.	d) To advise on all matters of safeguarding throughout the Church. e) To adopt best safeguarding practice for all its own activities and events.



## Safeguarding Committee

General Assembly has appointed a Safeguarding Committee to monitor the implementation of the URC Safeguarding Policy Statement and to oversee strategic matters of safeguarding throughout the Church.<sup>5</sup> The Committee reports to the Assembly Executive and General Assembly.

## Schools associated with the URC

The URC is associated with a number of schools, in both the state and private sectors. Schools will generally deal with safeguarding matters independently of the Church, based on the requirements of their policies and procedures. State schools are bound by the policies and procedures of the relevant Local Authority (or Trust if they are part of an academy group) and are inspected by Ofsted / Estyn / Education Scotland. Independent schools will have their own safeguarding policies which must adhere to statutory requirements and reflect national guidance. They are subject to routine inspection under arrangements administered by the Independent Schools Inspectorate (ISI).

Safeguarding concerns should, in the first instance, be directed to the head teacher of the school. Where an issue identified by a school involves a member of the URC who is working there, the relevant Synod Safeguarding Officer should be notified and will liaise with the school as appropriate. If anyone becomes aware of a safeguarding issue relating to a URC member who is involved in any way in a school, they should consult their Synod Safeguarding Officer and contact the head teacher.

## 1.5 Good Practice 6 (GP6)

The URC aims to foster best practice in safeguarding as an expression of God's loving concern for all.

While formal processes are not enough on their own to protect children and adults at risk, having good procedures in place is an essential starting point.

### Scope and purpose

*Good Practice 6* constitutes the URC's only guidance document for safeguarding throughout the denomination. The guidance in this document and its associated resources applies across all levels of the URC. This includes Councils of the Church (at local, synod and Assembly level), Resource Centres for Learning, Church members, adherents, trustees, paid and volunteer staff, as well as lay and ordained ministers of Word and Sacraments and Church Related Community Workers (CRCWs).

*Good Practice 6* is not itself a policy. Its purpose is to provide information about the URC's arrangements and procedures for safeguarding, and to offer model policies, resources and templates to help apply the guidance in practice. It is the responsibility of churches, synods and General Assembly to create and implement safeguarding policies for their own context which fit with *Good Practice 6* guidance.

### Nations within the UK and the Crown Dependencies

While the core principles of good safeguarding practice apply across different settings, there are some differences in legislation and regulatory frameworks between England, Wales, Scotland, the Isle of Man and the Channel Islands. *Good Practice 6* focuses primarily on England and Wales

5 [www.bit.ly/46EXXaZ](http://www.bit.ly/46EXXaZ)

and the same principles are generally applicable to the Crown Dependencies. The National Synod of Scotland follows Church of Scotland procedures (except for issues of safeguarding concerns about ministers where the Ministerial Disciplinary Process [Section O of The Manual] would apply).

## 1.6 Key definitions

The following definitions are used throughout the guidance and additional resources:

### Child

A child is defined as anyone who is under 18.<sup>6</sup>

*Please note: even though we often refer to teenagers who are under 18 years of age as young people, legally they are defined as children (regardless of whether or not they are living independently).*

### Adult

An adult is defined as anyone who has reached their 18th birthday.

### Adult at risk

There are slight variations in the definitions used across the UK and Crown Dependencies, but the common principle is that: Adults at Risk are aged 18 or over and, by reason of mental or other disability, age, illness or other situation are permanently, or for the time being, unable to take care of themselves, or to protect themselves against actual or potential abuse or neglect.

*See Resource G2: A Guide to Adult Safeguarding for further details.*

### Minister

The term 'minister' is used to refer to both ministers of the Word and Sacraments and Church Related Community Workers (CRCWs).

### Worker

A person who is appointed by the church to work with children or adults at risk on behalf of the church, on a paid or voluntary basis. This term is used to describe ministers, youth workers, adult workers, Elders, pastoral assistants and others, including volunteers, who may be involved in regulated work and activities with children and adults at risk.<sup>7</sup>

### Charity trustees

Those responsible for the general management and administration of a charity. In the URC, this includes local church Elders<sup>8</sup> (or equivalents in Local Church Partnerships), the board of trustees for each Synod Trust Company, and trustees of the URC Trust.

6 This is in line with the UN Convention on the Rights of the Child and UK legislation. In Scotland, guidance states that where a young person between the age of 16 and 18 requires support and protection, services will need to consider which legal framework best fits that person's needs. In some circumstances, the Adult Support and Protection (Scotland) Act 2007 can be applied to over 16s when the criteria are met. [www.bit.ly/3rRZHhA](http://www.bit.ly/3rRZHhA)

7 Use of the term 'worker' does not imply or confer any employment rights for those undertaking voluntary roles

8 In most cases the charity trustees will be the serving members of the Elders' Meeting although there are some cases where the Church Meeting has set up a separate body to act as Charity Trustee. [www.bit.ly/3ZOobVK](http://www.bit.ly/3ZOobVK)

## Position of Trust

A legal term that refers to certain roles and settings where an adult has regular and direct contact with children. Changes to the law in England and Wales in 2022 extended the definition to include faith group leaders. It is illegal for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over).





# Chapter two

## Safer culture

Building a safer culture helps to reduce the likelihood of harm occurring and provides the basis for more effective responses when problems do occur.

### **Key practice points**

- Clear safeguarding policies and procedures are needed at all levels within the Church
- No-one within the URC should be in a paid or voluntary position without having undergone some form of safer recruitment or safer election process
- Disclosure and Barring Checks are a necessary part of the safer recruitment process but are not sufficient on their own
- Safeguarding training helps ensure that staff and volunteers have the knowledge and skills appropriate for their roles
- Good safeguarding practice is underpinned by compliance with other relevant policies and procedures eg data protection and confidentiality.

### **Key responsibilities**

Local church:

- Appoint a Church Safeguarding Coordinator (and deputy where appropriate) and ensure contact details are publicly available for anyone to report a concern
- Have a safeguarding policy which is reviewed annually and updated when necessary
- Practice safer recruitment/election procedures for paid and volunteer roles
- Ensure those working with children or adults at risk are given copies of the *Codes of Conduct*
- Follow the requirements of the training framework
- Comply with legal requirements in respect of data protection
- Complete the Annual Church Safeguarding Return
- Ensure safeguarding is a regular agenda item for Church and Elders' Meetings.

Synod:

- Appoint a Synod Safeguarding Officer
- Have a safeguarding policy which is reviewed annually and updated when necessary
- Oversee implementation of the training framework
- Advise local churches on safer recruitment processes
- Collate information and provide an annual report to the Designated Safeguarding Lead
- Report to synod meetings matters of a safeguarding nature.

DSL / Denomination:

- Have a safeguarding policy which is reviewed annually and updated when necessary
- Lead on the development and review of Safer Culture processes
- Manage the process for blemished disclosures
- Provide an annual safeguarding report to General Assembly
- Report to the URC Trust matters of a safeguarding nature.

## 2.1 Promoting awareness of safeguarding

Creating a safer culture includes raising awareness across the denomination that:

- Both children and adults can be at risk of harm, abuse or neglect
- Safeguarding covers responding to abuse, but also other concerns about vulnerabilities (eg due to ageing) and issues of self-harm and suicide risks
- Concerns will be responded to in a caring way, maintaining confidentiality as far as possible
- Any allegations will be taken seriously, and will be referred to and investigated by the appropriate agencies.

People may feel uncomfortable talking about painful experiences or vulnerabilities. They may at times be unaware that they have been a victim (eg of financial abuse). Examples of ways to raise awareness and make it easier for people to talk about concerns could include:

- Provide information in the church or synod buildings (eg leaflets, Feel Safe poster *Resource D3*)
- Acknowledge the impact of abuse in public prayers (in general terms, not individual experiences)
- Talk about issues of mental health and different types of vulnerabilities
- Speak out against abuse in preaching and teaching
- Build relationships with local specialist services and pray for their work (eg local charities providing support for those experiencing domestic abuse or dealing with addictions).



# Safeguarding roles, policies and reporting

## 2.2 Roles with specific safeguarding responsibilities

Within the URC there are specific roles which carry particular responsibility for promoting good safeguarding practice.

### Trustees

Trustees have oversight of all aspects of safeguarding and this applies at local church, Synod and URC Trust level. They are accountable to the relevant regulatory bodies for safeguarding in any local church and body of the URC, even if certain aspects of the work are delegated to other staff.

### Church Safeguarding Coordinator (CSC) and Deputy CSC

Each church must have a Safeguarding Coordinator. A deputy should also be appointed, if possible. See *Resource S1: The Role of a Church Safeguarding Coordinator* for a role description. It may not be possible to find one person willing and able to perform both the safeguarding children and safeguarding adult roles. In this case, separate Safeguarding Coordinators should be

## Even if a church currently has no children attending, Safeguarding Coordinators should still be appointed.

appointed for children and adults at risk. Ministers / CRCWs are not allowed to take up the role of Safeguarding Coordinators because of their overall pastoral responsibilities. It is also not advisable for their spouses or close family members to take on the role within the same church community, to prevent any conflict of interest. Churches may consider appointing one coordinator for a group of churches.

Churches must display information detailing who to contact and a list of helpful phone numbers. See *Resources D1: Model church safeguarding poster* and *D2: Suggested safeguarding wording for websites*. Churches also need to notify the Synod Safeguarding Officer of the name and contact details of their Safeguarding Coordinator(s) and deputy Safeguarding Coordinator(s), whose information will be stored on the URC database. It is advisable to have a specific email address for the CSC (eg **churchnamesafeguarding@gmail.com**) to avoid using personal accounts for safeguarding correspondence and to ensure that information is not lost when someone new takes on the role. Where a CSC has other roles in the church and may not wish to use multiple email addresses, a church email address should still be used for safeguarding correspondence, not a personal one.

Even if a church currently has no children attending, Safeguarding Coordinators should still be appointed. This is because all churches can have adults at risk in attendance, especially considering that some vulnerabilities can be hidden. Children or adults at risk could attend and / or access services of the church at any time, and good safeguarding practice needs to be in place already.

### Synod Safeguarding Officer (SSO)

Each synod should appoint a Synod Safeguarding Officer to be responsible for leading safeguarding matters in the synod, as well as advising and supporting local churches on safeguarding. They will also disseminate good safeguarding practice information and share lessons to be learnt from statutory and faith sector reviews.

### Designated Safeguarding Lead (DSL)

The Church appoints an Assembly-level Designated Safeguarding Lead (DSL) to oversee and advise on matters of safeguarding across the denomination. As part of their role, the DSL provides support to Assembly and synod staff in helping local churches with serious safeguarding situations, as well as helping them comply with Good Practice.

## 2.3 Safeguarding policies and reporting

### Local church

#### Safeguarding policies

Each church should adopt the URC's safeguarding policy, practices and procedures for safeguarding children and adults at risk. *Resource P1: Model Church safeguarding policy* provides an example safeguarding policy for local churches.

- This should be made readily available to anyone who wishes to see it
- Each policy should be reviewed and updated on an annual basis, adopted by the Church Meeting, and compliance monitored by the Elders' Meeting
- A safeguarding policy statement should be prominently displayed in the Church (and on a

Church's website), summarising the principles and intent of the policy. *Resource P2* provides examples of template policy statements which can be adapted as required.

The exceptions to this are:

- i) Churches in a Local Ecumenical Partnership (LEP)  
Under the sharing of Church Buildings Act 1969, an LEP can opt to use the safeguarding policies of any member denomination involved in the LEP. However, LEPs should avoid switching arbitrarily between denominational safeguarding policies and systems, and are not permitted to create their own policy or make a hybrid policy – it must be the policy of one of the denominations. They should also be aware that policies can interact with each other eg the Methodist Safeguarding Policy is linked with the Methodist data privacy policy. LEPs should also inform Church House and their Synod Safeguarding Officer, via the church return forms or the URC Church Update portal, which denominational policy and procedures they have decided to follow in operating all relevant business, including reporting safeguarding incidents, safer recruitment, training, and so on. See *Resource G1: Guidance on Safeguarding for Local Ecumenical Partnerships* for more information.
- ii) Churches in Scotland  
The National Synod of Scotland follows Church of Scotland policies and procedures.

### **Local church annual safeguarding returns (ASR)**

A review of safeguarding policy, practice and procedures at the church is required once a year, perhaps around the same time as the church AGM.<sup>9</sup> The Safeguarding Coordinator of each local URC should report annually to the Eldership or Church Council and the Synod Safeguarding Officer as part of the annual returns process. This report will assist the Synod Safeguarding Officer in providing appropriate support and guidance to local churches. However, the annual returns should not be the first time the Synod Safeguarding Officer finds out about any incidents or concerns. The report should include a summary of any safeguarding concerns that have arisen in the period (minus any identifying details), the action taken in each situation, any lessons learned, referrals made to statutory authorities and regulators, and any implications for the review of safeguarding policy and procedures. The annual safeguarding return can be completed online via the URC Church Update Portal or by paper copy – see *Resource F4: Annual safeguarding returns form*.

## **Synods**

### **Safeguarding policy**

Each synod should adopt policy, processes and procedures for safeguarding children and adults at risk during synod activities. These should be reviewed, updated and approved annually by the synod trustees, in accordance with *Good Practice 6*.

### **Synod annual safeguarding report**

An annual safeguarding report should be provided by the Synod Safeguarding Officer to the synod trustees summarising any safeguarding concerns which have arisen from within the synod (minus any identifying details), any actions taken in individual cases, lessons learned, and any implications for the review of safeguarding policy and procedures. In synods where a safeguarding reference group has been set up by the synod and its trustees to take primary responsibility for safeguarding, the annual report should be received by this group, with a summary going to

<sup>9</sup> LEPs following another denomination's safeguarding policy are currently still expected to complete an ASR. Guidance will be updated if this changes at some point (for example, if it becomes possible for information to be shared between denominations so that only one return is needed).



the trustees. In addition, the annual safeguarding report should give a summary of the annual safeguarding return information provided by local churches, and details of the safeguarding training and support provided by the synod.

A copy of this Annual Synod Safeguarding Report should be given to the URC Designated Safeguarding Lead. This will allow the Church as a whole to review its commitment to safeguarding children and adults at risk, and provide suitable support and guidance to synods and local churches.

## General Assembly

The 2021 General Assembly issued a safeguarding policy statement which will be reviewed and updated as needed (see [www.bit.ly/urcbor2021](http://www.bit.ly/urcbor2021)). All Synod Safeguarding Officers meet regularly to review existing safeguarding practices of the Church. The URC Designated Safeguarding Lead collates all synod safeguarding annual reports, and then reports to the Safeguarding Committee and the URC trustees.



# Safer recruitment

## 2.4 What is safer recruitment?

Safer recruitment is a framework for designing your recruitment process to deter unsuitable applicants from applying for roles with vulnerable groups, and to identify and reject them if they do. Operating a safer recruitment policy sends a powerful message to all those involved in church life, including those intent on causing harm, that safeguarding is taken seriously by the URC. Failing to carry out a safer recruitment process can put people at risk and could also invalidate insurance policies if a serious safeguarding incident occurs.

### Key stages of safer recruitment

The key principles of safer recruitment apply in all cases, but the process should be proportionate to the role eg it will be more detailed for a paid employee than for a volunteer.



All these different elements are important as information may be missed if just relying on one part of the process. For example, an individual might not have any convictions but a reference might reveal inappropriate conduct which indicates that they would be unsuitable for a particular role.

All checks and references must be received before an individual takes up their role. This will reduce the risk of exposing people to potential harm, as well as the embarrassment of having to remove someone from a role if they prove unsuitable. It also reduces the risk of committing an offence by inadvertently placing someone into a role they are prohibited from doing (see section 2.5 below).

The Resources page has a range of materials to help with the safer recruitment process, including: *SR1 volunteer application form*; *SR2 volunteer reference request*; *SR3 sample questions for interviews and discussions*; and *SR4 sample role descriptions* (for Children’s Church, youth club etc).

## Safer recruitment of volunteers

Churches will need to use their own judgement in applying these procedures, and it may vary for different roles, but key steps typically include:

Stage	Typical activities
Preparation	<ul style="list-style-type: none"> <li>• Provide a role description</li> <li>• Specify what level of disclosure and barring check will be required</li> <li>• Decide where and how to advertise the role.</li> </ul>
Application process	<ul style="list-style-type: none"> <li>• Application form</li> <li>• For certain roles, a self-declaration form will be needed.</li> </ul>
Interview or discussion	<ul style="list-style-type: none"> <li>• Safeguarding issues taken into consideration eg reasons for taking on role, relevant experience, any problems in previous roles.</li> </ul>
References and checks	<ul style="list-style-type: none"> <li>• Appropriate level of DBS / Disclosure Scotland check</li> <li>• References, ideally at least one from someone who knows of their work with children or adults at risk.</li> </ul>
Induction, training and support	<ul style="list-style-type: none"> <li>• Ensure volunteers have copy of church safeguarding policy and relevant <i>Codes of Conduct</i></li> <li>• Require attendance at relevant level of safeguarding training</li> <li>• Volunteer knows who to contact with any queries or concerns</li> <li>• Set expectations of how work will be supervised.</li> </ul>

## Safer recruitment of employees

For employees, each stage of the process will be more detailed, for example:

Stage	Typical activities
Preparation	<ul style="list-style-type: none"> <li>• There is a written job description and person specification</li> <li>• Specify what level of criminal records check will be required</li> <li>• The job description makes clear the duties expected of regarding contact with, and responsibility for, children or adults at risk, and what level of supervision will be provided for these duties</li> <li>• The position is advertised.</li> </ul>
Application process	<ul style="list-style-type: none"> <li>• Application form</li> <li>• Self-declaration form.</li> </ul>
Interview or discussion	<ul style="list-style-type: none"> <li>• Interviewed by a panel (not just one person)</li> <li>• Safeguarding has been discussed at interview.</li> </ul>
References and checks	<ul style="list-style-type: none"> <li>• Written references have been obtained and followed up</li> <li>• Qualifications have been verified</li> <li>• Appropriate level of DBS/Disclosure Scotland check completed</li> <li>• An applicant's UK residency status and/or right to work in the UK will be checked when recruiting for a paid role.</li> </ul>
Induction, training and support	<ul style="list-style-type: none"> <li>• A suitable induction training programme is provided</li> <li>• The applicant has been given a copy of the church / organisation safeguarding policy and knows how to report concerns</li> <li>• Copies of relevant <i>Codes of Conduct</i> have been provided</li> <li>• A probationary period has been agreed</li> <li>• Supervision expectations are set</li> <li>• Safeguarding training has been attended.</li> </ul>

## Safer election of Elders

Elders are called into ministry by the Church Meeting. However, the URC acknowledges that those who are in positions of responsibility should be properly equipped for the ministry to which they are called.

The key provisions in relation to safeguarding are that a newly elected Elder shall:

- a) undertake a suitable induction training programme
- b) be given a copy of:
  - *URC Guidelines for the Conduct and Behaviour of Elders*  
(see [www.bit.ly/3RSNGml](http://www.bit.ly/3RSNGml))

- the church's safeguarding policy with knowledge of how to report concerns
- c) apply for a relevant DBS / Disclosure Scotland check
- d) attend safeguarding training within six months of ordination and / or induction.

For further details see [www.urc.org.uk/urc-ministries/safer-election-of-elders/](http://www.urc.org.uk/urc-ministries/safer-election-of-elders/).

## 2.5 Disclosure and barring checks

Checks are carried out with the Disclosure and Barring Service (DBS) in England, Wales, the Channel Islands and the Isle of Man, and with Disclosure Scotland. The different schemes all recognise each other's decisions so, for example, an applicant who is barred from working with children or adults at risk in one part of the country is barred across the whole of the British Isles.

### Types of checks

- **Basic:** This checks for unspent criminal convictions and conditional cautions only
- **Standard:** This checks for spent and unspent convictions, cautions, reprimands and final warnings
- **Enhanced:** This includes the same as the standard check, plus additional information held by local police that is reasonably considered relevant to the role for which the person has applied
- **Enhanced with barred list checks:** This is similar to the enhanced check, but also includes a check of the DBS barred lists. This is equivalent to the Protecting Vulnerable Groups (PVG) Scheme in Scotland.

### Which church roles and positions require a check?

A full list of the types of checks currently required within the URC for different roles is provided in *Resource S3*. The government also provides an online tool to check the eligibility of roles for a Disclosure and Barring Service (DBS) check in England and Wales.<sup>10</sup>

### Roles involving Regulated Activity

The Protection of Freedoms Act 2012 updated the definition of regulated activity originally given in the Safeguarding Vulnerable Groups Act 2006. Whether or not a particular role involves Regulated Activity depends on:

- the type of work
- the frequency and period of time over which the work will be done
- if and how the work will be supervised.

An Enhanced with barred list / PVG check must be carried out for all roles involving Regulated Activity.

*Please note: Regulated Activity excludes any activity carried out in the course of family relationships or private arrangements made outside of a church role, for example between friends.*

### Regulated activity in relation to children

This comprises:

- i) Unsupervised activities: teach, train, care for or supervise children, or provide advice / guidance on wellbeing, or drive a vehicle only for children;
- ii) Work for certain establishments eg schools, children's homes, childcare premises.

<sup>10</sup> [www.gov.uk/find-out-dbs-check](http://www.gov.uk/find-out-dbs-check)

Work under (i) and (ii) is Regulated Activity only if done regularly ie once a week or more often, or on four or more days in a 30 day period, or overnight.<sup>11</sup>

In local churches, roles involving Regulated Activity would include:

- any role which involves teaching, supervising or providing advice and guidance to children on a frequent (weekly) basis, such as leaders of weekly children's and youth groups
- any role which involves teaching, supervising or providing advice and guidance to children intensively (at least four days in a 30-day period), such as leaders at a children's holiday club lasting four days or more
- any role which involves the supervision of children overnight, irrespective of how many nights or how often, for example leaders staying overnight at a residential event
- any role which includes personal care of children on account of their illness, disability or age, irrespective of how often this takes place, such as leaders helping children with eating, drinking, toileting, washing, bathing or dressing
- those who drive children as part of their church role weekly, four or more days in a 30-day period, or overnight, for example someone who has been asked by the church to transport children to and from a church activity
- any role on church premises used for Ofsted (Care Inspectorate in Wales) registered childcare, which gives opportunity for unsupervised contact with children during childcare, such as a church office worker or caretaker in a building where toilets are shared with the children
- any role which includes the management or supervision of the above Regulated Activity.

### **Activities in which parents / carers are present**

The definition of Regulated Activity applies regardless of whether or not parents/carers are present. Any roles which involve regular teaching, supervision or personal care of children would still require an Enhanced with barred list / PVG check even when parents and carers are present eg toddler groups or Messy Church. ('Regular' here is as defined above in terms of once a week or four or more days within a 30-day period.)

### **Regulated Activity in relation to adults at risk**

An individual is carrying out Regulated Activity relating to adults<sup>12</sup> only when engaging in one of these six types of activity:

- Providing health care: the provision of healthcare by any healthcare professional or under the direction or supervision of a healthcare professional
- Providing personal care: the provision of physical assistance with eating or drinking, going to the toilet, washing or bathing, dressing, oral care or care of the skin, hair or nails because of the adult's age, illness or disability. It includes prompting and supervising an adult with any of these tasks or teaching them to do any of these task

11 Regulated activity with children: [www.bit.ly/45k7zX1](http://www.bit.ly/45k7zX1) (England); [www.bit.ly/3Q7pxI2](http://www.bit.ly/3Q7pxI2) (Wales)

12 Regulated activity with adults: [www.bit.ly/46uZCiK](http://www.bit.ly/46uZCiK) (England); [www.bit.ly/46kgKb9](http://www.bit.ly/46kgKb9) (Wales)

- Providing social work: the activities of regulated social workers in relation to adults who are clients or potential clients
- Assistance with general household matters: provision of day-to-day assistance to an adult because of their age, illness or disability, where that assistance includes at least one of
  - i) managing the person's cash;
  - ii) paying the person's bills; or
  - iii) shopping on their behalf
- Assistance in the conduct of a person's own affairs: assisting in the conduct of an adult's own affairs under a formal appointment eg power of attorney, independent advocacy services, receiving benefit payments on the person's behalf
- Conveying: drivers (and any assistants) who transport an adult because of their age, illness or disability to or from places where they receive healthcare, personal care or social work.

Even if people only engage in these activities once, it is still considered Regulated Activity.

An individual whose role includes day-to-day management or supervision of any person who is engaging in Regulated Activity is also considered to be working in Regulated Activity.

Within a church setting, Regulated Activity with adults is likely to be limited to a small number of church roles where the person is involved, as part of their church role, in:

- helping with washing, dressing, eating, drinking, toileting or teaching someone to do one of these tasks
- helping with a person's financial transactions, bills or shopping on account of their age, illness or disability. (Posting letters for a housebound person is not Regulated Activity, but taking money from them to pay for postage is Regulated Activity)
- driving someone on account of their age, illness or disability to / from places in order to receive health, personal or social care.

## Roles not involving Regulated Activity

It is not appropriate to carry out a barred list / PVG check for roles which do not involve Regulated Activity, but another type of disclosure check should still be made for roles involving other work with children and adults at risk.

### Working with children

Where an individual is not in Regulated Activity but is still working with children, they are eligible for an Enhanced without barred list check (this applies regardless of whether or not parents / carers are present). This includes situations where the individual is engaged in activities such as teaching, caring for or driving children but does not do this often enough for it to qualify as Regulated Activity.<sup>13</sup> An example would be someone who helps out with a crèche or youth group on fewer than four days in a 30 day period.

If an individual teaching or caring for children is supervised (ie is in sight of the supervisor at all times) by someone with a current barred list check, they would also be eligible for an Enhanced (without barred list) check.

### Working with adults at risk

Those involved in activities such as providing pastoral care to adults at risk or driving them to church are eligible for an Enhanced (without barred list) check. This relates to activity organised by and carried out on behalf of the church (eg being on a rota for lifts that is managed by the church would be included, but an arrangement between friends wouldn't be).

13 [www.bit.ly/3rNNDxX](http://www.bit.ly/3rNNDxX)

Further details and updates will be available from:  
[www.unc.org.uk/safeguarding/safer-recruitment/](http://www.unc.org.uk/safeguarding/safer-recruitment/).

## **Practicalities of carrying out disclosure and barring checks**

Due Diligence Checking Ltd (DDC) carries out all checks on behalf of the URC. More detailed guidance about the process is available on the URC pages on the DDC's website.<sup>14</sup>

### **Who can be the verifier in a local church?**

Currently, the Church Secretary is automatically on the list of approved verifiers.<sup>15</sup> The church can ask for additional people to be added as verifiers via the URC Church Update portal or by completing the 99SG form, which is available via the safeguarding section of the URC's website. Family members cannot act as verifiers for each other so another approved verifier would need to confirm identity documents in such situations.

### **Consent from applicants**

It is essential that criminal offence data obtained are obtained lawfully, fairly and transparently. Any application for a check should, therefore, be initiated with the consent of the applicant to ensure protection of the rights of people who apply to work or volunteer for the URC. Where a local church or synod has a Privacy Notice, this should be provided to applicants before a check is made so that they can understand what will be done with their data, and why they are providing it. A model Privacy Notice can be found on the URC website.<sup>16</sup>

### **How does a church check the suitability of people who have spent time abroad?**

DDC can carry out international criminal record checks at the request of the Synod Safeguarding Officer and Church House Safeguarding Administrator. Seek advice from your Synod Safeguarding Officer if you become aware that someone lived abroad more than five years ago (the DBS application asks for addresses over the last five years so would not necessarily pick up details from before then). This information could come from an employment history (for paid roles) or from an application form for volunteer roles (see *Resource SR1*) for example.

If checks from other countries cannot be obtained or are not available, extra care should be taken when obtaining references or checking any previous employment record. In such cases, it would be advisable to seek additional references, as well as actually speaking to referees by phone or video call. It is acknowledged that if someone has been travelling abroad, eg on a gap year where a number of countries might be visited, it will not be possible to obtain the information in this format. Therefore, it is even more important that other steps in the safer recruitment process are followed and that the references, and any previous employment or volunteer experience, are verified.

### **How often should DBS / Disclosure Scotland checks be renewed?**

Checks for all roles and positions must be renewed every five years.

The URC does not currently accept certificates from other organisations where church members may have had DBS checks as part of their employment or other voluntary activity, so any roles taken up will require a check by the URC. Use of the DBS update service is currently under discussion, however, and guidance will be issued as and when a decision is made about whether and how this might be used.

14 [www.ddc.uk.net/unc/](http://www.ddc.uk.net/unc/)

15 This may change to be the Church Safeguarding Coordinator, churches will be notified when this takes effect.

16 [www.unc.org.uk/gdpr](http://www.unc.org.uk/gdpr)

## Recruitment of ex-offenders

Both the DBS code of practice<sup>17</sup> and Disclosure Scotland code of practice<sup>18</sup> state that all registered bodies must treat applicants who have a criminal record fairly and not discriminate automatically because of a conviction or other information revealed. The codes oblige all churches registered with DBS / Disclosure Scotland to have a written policy on the recruitment of ex-offenders, a copy of which can be given to DBS applicants at the outset of the recruitment process. *Resource P4* provides a model policy statement on the recruitment of ex-offenders. The URC is committed to equality of opportunity and, while not being complacent about risk, understands that people are capable of reform. We will consider all offences on an individual basis and many offences will not prohibit people who are otherwise suitable to work with children or adults at risk from doing so.

Under GDPR, extra protection is given to ‘personal data relating to criminal convictions or offences’ (known as criminal offence data). Data processing should be lawful, fair, transparent and in line with all the principles and requirements of GDPR.<sup>19</sup>

## Blemished disclosures

Disclosure information, including whether a disclosure has content (known as a blemished disclosure), is only made known to those who need to know. Local church verifiers are not required to see or request to see blemished disclosures as the URC Safeguarding Team at Church House is responsible for handling these.<sup>20</sup> In cases relating to ministers of Word and Sacraments, Church Related Community Workers, Assembly Accredited Lay Preachers and Assembly Accredited Lay Pioneers, the process is managed by the Secretary for Ministries, in consultation with the Designated Safeguarding Lead. DDC will contact the applicant directly if their disclosure is blemished to gather further information from them and arrange for the disclosure to be sent to their offices to be passed on to the Safeguarding Team at Church House.

Where a blemish relates to a conviction, the Safeguarding Team at Church House will identify whether this is spent or unspent, and then notify the relevant Synod Safeguarding Officer who will carry out a risk assessment. If the outcome of the risk assessment is that the individual can take up their role, and the conviction is unspent, the Safeguarding Team at Church House will contact the URC insurers, copying in the SSO, to seek agreement for them to cover the risk of someone with an unspent conviction having that position within the church.

If an applicant is cleared to work in a role, the local church or URC office will receive a standard email notification confirming the certificate’s issue number and date. If an applicant is deemed unsuitable to work in a role, or should work within particular conditions, they will receive a specific notification containing the relevant information. No applicant should start working in their role before local churches receive such notification. In the Synod of Scotland, the risk assessment process for staff and volunteers is conducted jointly between the synod and the Recruitment Sub Committee of the Church of Scotland because of the different safeguarding arrangements.

In particularly complex cases, a review panel will be convened to consider the risk assessment and decide on suitability for a role. This will comprise the Designated Safeguarding Lead, Synod Safeguarding Officer, Synod Moderator, Church Safeguarding Coordinator and a member of the Safeguarding Committee with relevant expertise.

17 [www.gov.uk/government/publications/dbs-code-of-practice](http://www.gov.uk/government/publications/dbs-code-of-practice)

18 [www.mygov.scot/disclosure-code-of-practice](http://www.mygov.scot/disclosure-code-of-practice)

19 [www.bit.ly/3rMhUxb](http://www.bit.ly/3rMhUxb)

20 **The URC Safeguarding Team at Church House consists of the Secretary for Ministries and the Designated Safeguarding Lead**



### **Individuals who are barred from Regulated Activity**

This opportunity to potentially make an appointment, subject to a risk assessment and or certain conditions, does not apply to roles involving regulated activity where an individual has been barred from working with children and / or adults at risk. An individual who is barred and seeks to work (either paid or unpaid) in Regulated Activity is committing a criminal offence. An organisation which knowingly seeks to appoint an individual who is barred from working in Regulated Activity from which they have been barred is also committing a criminal offence. Both offences are punishable by a £5,000 fine and / or five years' imprisonment. A church therefore **must not** allow anyone who is on either of the barred lists to work or volunteer in any role involving Regulated Activity from which they have been barred.

### **Suitability for other positions of responsibility**

The URC may decide that an individual with certain convictions, or who is on a barred list, is unable to hold a position of responsibility within the church (even if the role does not involve Regulated Activity). This will be decided on a case-by-case basis, following a risk assessment, and discussion with the DSL, SSO and, if necessary, a complex cases review panel.

### **Storage, handling, use, retention and disposal of disclosure information and certificates**

The DBS / Disclosure Scotland codes of practice require that all registered bodies must have a written policy on the correct handling and safekeeping of certificate information. It also obliges those registered bodies to ensure that any body or individual on whose behalf they are countersigning applications has a written policy in place. A model policy can be found on the DBS website.<sup>21</sup>



# **Training and codes of conduct**

## **2.6 Training**

The United Reformed Church recognises that it is everyone's responsibility to safeguard others and thus it needs to ensure that people holding specific roles and responsibilities are specifically equipped to protect vulnerable groups.

### **Safeguarding training framework**

General Assembly adopted the Safeguarding Training Framework for use across the URC in 2021. This sets out a four-tier structure of training:

- **Foundation:** aimed at those who may come into contact with children or adults at risk during the course of their role

21 [www.bit.ly/48RvNuz](http://www.bit.ly/48RvNuz)

- **Intermediate:** for those whose role involves working or volunteering with children or adults at risk
- **Advanced:** to support those who have safeguarding leadership roles in which they manage and oversee safeguarding arrangements and practice
- Specialist training for those in particular roles or covering specific topics.

The table in *Resource S2* shows the mandatory levels of training required for different roles (based on General Assembly paper T5). Training should be renewed every three years.

For Wales: training will be delivered in line with the National Safeguarding Training, Learning and Development Standards, incorporating the Memorable Principles for different groups.

[www.bit.ly/walesocialcare](http://www.bit.ly/walesocialcare)

Synod Safeguarding Officers will<sup>22</sup>:

- oversee the implementation of the training framework in their synod
- provide regular training opportunities for church members
- keep records of who has completed the online Foundation training and who has attended Intermediate or Advanced training in their synod.

Church Safeguarding Coordinators are responsible for:

- ensuring all relevant church members undertake URC safeguarding training at the level required for their role(s)
- reminding church members to renew relevant training every three years.

The Church House Safeguarding Administrator will:

- Record details of who has completed training delivered by the central team on the URC database.

### **Specialist URC safeguarding training**

Further training is available for people in particular roles including:

- DBS Verifier training
- Safer recruitment
- Elders as Trustees training
- Church Safeguarding Coordinators
- Safeguarding for ministers supporting survivors.

Training on specific topics is also available including:

- Awareness of domestic abuse
- Adult safeguarding
- Substance misuse
- Suicide awareness
- Working with refugees and asylum seekers
- Modern slavery.

Other training courses are being developed and will be added to the resources available.

See [www.urc.org.uk/safeguarding/](http://www.urc.org.uk/safeguarding/) for up-to-date details and training dates.

### **Training modules for specific roles**

Synod Safeguarding Officers, the DSL and some others may need to undertake further specialist training as part of their professional development.

**The United Reformed Church recognises that it is everyone's responsibility to safeguard others**

22 National Synod of Scotland has an agreement for the Church of Scotland to provide safeguarding training.

## Recognising other training providers

Those who hold a role in the URC requiring completion of the Intermediate or Advanced level of training should complete this with the URC regardless of previous experience or other training undertaken because the content relates directly to URC processes and procedures for safeguarding.

## 2.7 Codes of conduct

The Church Safeguarding Coordinators or Church Secretary need to provide copies of the relevant *Codes of Conduct* to anyone in a role working with children or adults at risk at local church level. For synod or Assembly events, organisers should ensure staff / volunteers have copies of the *Codes of Conduct*, in addition to any specific guidance or ground rules for that particular event. Relevant resources are *C1: Code of Conduct for Working with Children (Under 18s)* and *C2: Code of Conduct for Working with Adult (Over 18s)*.



# Data protection

## 2.8 Data protection and information sharing

When dealing with any data relating to safeguarding concerns or allegations, it is necessary to understand **both**:

- i) individuals' rights concerning their own data; and
- ii) when and how information can be shared for the purpose of preventing harm.

### Privacy and individuals' rights

It is important that workers are aware the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) place duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure. Under GDPR, individuals have eight rights in relation to their personal data. The most relevant ones for safeguarding purposes are:

- Right to be informed about collection and use of personal data
- Right to access data held about them by a data controller
- Right to rectification of inaccurate information
- Right to erasure
- Right to object to processing of personal data in certain circumstances.

It is therefore important to ensure that all data is as accurate and fair as possible, recognising that records (including emails) can be seen by individuals if they request it.

### Sharing information for safeguarding purposes

Nothing in the Data Protection legislation seeks to limit the appropriate disclosure of information in order to protect an individual who is, or may be, at risk of harm. The Data Protection Act 2018 contains "safeguarding of children and individuals at risk" as a processing condition that allows



practitioners to share information. What matters is that the process of information sharing is carried out appropriately.

Workers must, therefore, decide whether sharing information is a necessary and proportionate response to the need to protect an individual. The decision-making process must weigh up what might happen if the information is shared against what might happen if it is not shared. If in doubt, always seek advice from the Synod Safeguarding Officer.

### **Consent for sharing information**

Consent from individuals should be sought to share information whenever possible. However, sharing confidential information without consent can be justified in the public interest when:

- there is evidence or reasonable cause to believe that a child or an adult is suffering, or is at risk of suffering, significant harm
- it could prevent significant harm to a child or serious harm to an adult
- to seek consent would prejudice the prevention, detection or prosecution of a serious crime
- to seek consent would lead to an unjustified delay in making enquiries about allegations of significant harm to a child or serious harm to an adult.

**NB: If you are concerned that there is an immediate risk of harm to a child or adult at risk, information should be passed on to the relevant person without delay, regardless of whether or not consent can be obtained.**

### **Recording decisions about information sharing**

When information is shared, a record should be made of when it was shared, with whom, in what form, for what purpose, and whether it was disclosed with or consent. Similarly, any decision not to share information, and the reasons why, should also be recorded.

### **Sharing information on a 'need to know' basis**

It is important to maintain confidentiality, sharing sensitive and personal information only on a 'need to know' basis. This means that it should only be shared with individuals and agencies who have a responsibility for the reporting of, or decision making about, a particular safeguarding situation.

For a local church, such people would normally include:

- the Church Safeguarding Coordinator
- the church minister, leader, CRCW or Interim Moderator
- the Synod Safeguarding Officer
- the statutory agencies to whom a safeguarding referral is being made. Churches should share all relevant information in their possession, and follow multi-agency decisions.

For a synod or Assembly event, this would ordinarily include:

- the person appointed to act as Safeguarding Officer for the event
- the synod or Assembly Safeguarding Officer
- the Synod Moderator or the URC General Secretary
- the statutory agencies to whom a safeguarding referral is being made. Synods or Church House should share all relevant information in their possession, and follow multi-agency decisions.

Decisions about whether others need to be informed, such as the parents or carers of children or adults at risk, would be made by those managing the case, and would be on a strictly 'need to know' basis. There may well be situations where they should not be told.

The whole Eldership of a local URC, or the trustees of a synod or Assembly, might be informed that a safeguarding case is being dealt with, and the actions that are being taken, without divulging confidential details of the case. These details might include the people and churches involved, or the precise nature of the issue. Synod Moderators should always be informed when the general wellbeing of a church is affected by a serious safeguarding incident, or when the whole Eldership of a local church are failing to take appropriate steps to protect a child or an adult at risk.

### Top tips

GDPR and the Data Protection Act are not barriers to sharing information. They provide a framework to ensure that personal information about living persons is shared appropriately

- Be open and honest with the person (and their family or those supporting them where appropriate) about why, what, how and with whom information will, or could, be shared
- Seek advice if in any doubt, without disclosing the identity of the person where possible
- Share with consent where appropriate. Do not seek consent if doing so would increase risk
- Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely
- Keep a record of your decision and the reasons for it, whether it is decided to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. If you decide not to share, then record why. Records should demonstrate how the process has been managed. Keeping a chronology of events can be useful in this respect.

## Storing information

All paper and electronic records should be stored appropriately, in line with legislation and guidance. Paper records should always be stored securely on church or office premises, rather than in private homes. Confidential, sensitive or important records should always be stored in locked filing cabinets or safes, and must be disposed of in a secure manner, such as by shredding. A well-organised filing system should include appropriate procedures for the retention and disposal of records, as detailed in the table below. Emails are also electronic records which need to be managed appropriately, and any filing system used for this type of communication must also have appropriate procedures for retention and disposal, as described in the table below.

### Record retention periods

Records must be kept only if they are required for operational, legal and historical purposes. When records are no longer required for any of these purposes, they should be destroyed in an appropriate manner.

Type of record	How long to keep it
Safeguarding policy documents	Date policy superseded + 25 years
DBS / Disclosure Scotland certificate information	The actual disclosure form must be destroyed after six months. A record can be kept of the date of issue of a Certificate, the name of the subject, the type of Certificate requested, the position for which the Certificate was requested, the unique reference number and the details of the recruitment decision taken. A record of whether a disclosure was clear or blemished must not be kept.

Records relating to safeguarding concerns about children or adults at risk	These should be kept for 75 years following the date when the concern is raised.
Records relating to a safeguarding-related allegation (against a member of staff/volunteer, including where the allegation is unfounded)	These should be kept for 75 years following the date when the concern is raised.
Safeguarding Contract/Agreement with an offender / alleged offender	This should be kept for 75 years following the date when the contract / agreement is signed.

## Subject Access Requests (SARs)

Under GDPR, individuals can request to see data which a church, synod or the DSL holds about them (Subject Access Request). Responses to SARs should normally be provided within 30 days unless there are exceptional circumstances. For advice on responding to SARs, contact Church House, who can provide further guidance and templates to use.

## Requests for data rectification and data erasure

If an individual demonstrates that information held about them is inaccurate, they have a right to data rectification under GDPR and the data controller must correct inaccurate data. The right to data erasure is unlikely to apply in safeguarding cases as documents are required to be retained for 75 years (see table above). Contact Church House for advice on dealing with these types of requests.



# Other relevant policies

## 2.9 Whistleblowing

To fulfil its commitment to safeguarding and promoting the welfare of children and adults at risk, the URC recognises the importance of creating a culture where there is a mechanism in place for workers to be able to raise legitimate concerns about other workers. This is commonly referred to as whistleblowing. The Public Interest Disclosure Act 1998 gives workers legal protection against being dismissed or penalised as a result of publicly disclosing certain serious concerns. While the Act does not provide the same protection for volunteers, churches should endeavour to adopt the same practice for all. All staff, volunteers and members of a congregation should be encouraged to acknowledge and take individual responsibility by bringing matters of unacceptable practice, performance or behaviour to the attention of any of the following:

- Church Safeguarding Coordinator or deputy
- Elders
- Minister or Interim Moderator
- Synod Moderator

- Synod Safeguarding Officer The URC Whistleblowing Policy is available at: [www.bit.ly/papert2](http://www.bit.ly/papert2)

## 2.10 Bullying and harassment

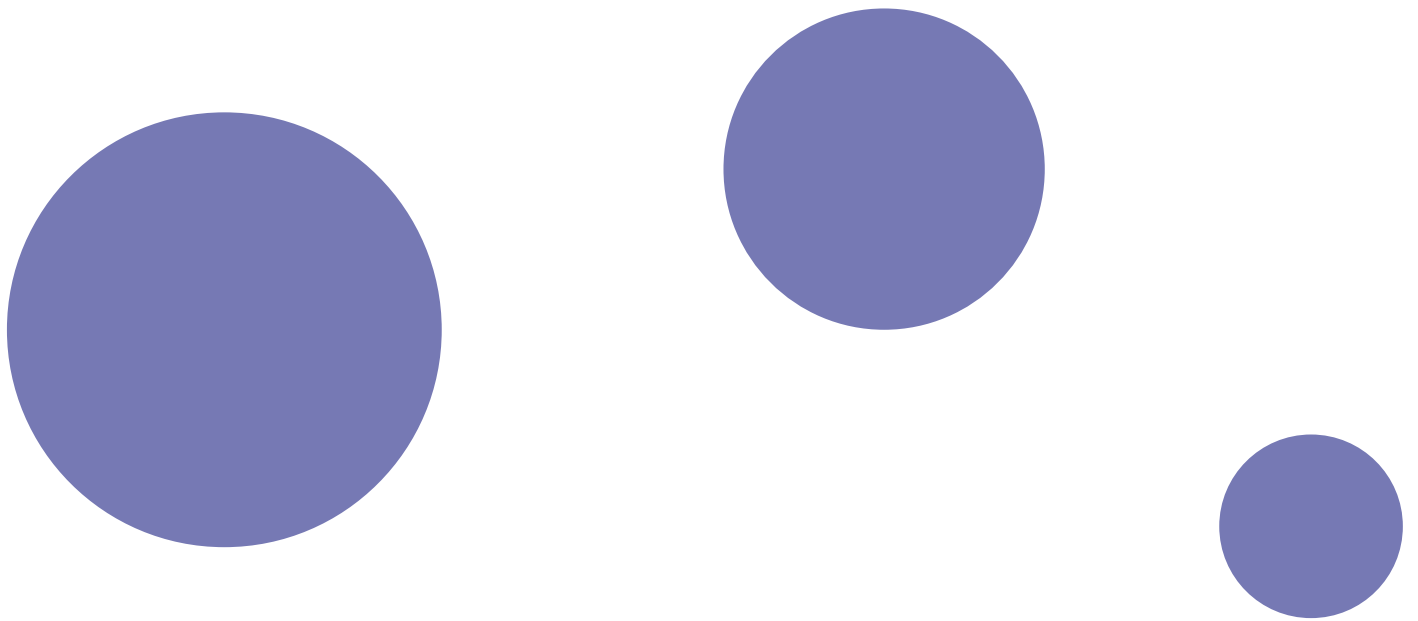
The United Reformed Church acknowledges that bullying and harassment do occur within local churches and the wider councils. It is important that people should know where to find help if they believe themselves to have been bullied, and that those responsible for pastoral care should be vigilant for signs that bullying may be occurring.

There is no legal definition of bullying but it is often characterised as: Offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, intended to cause hurt or pain, or to undermine, humiliate, denigrate or injure the recipient .

Harassment is defined in the Equality Act 2010 as: "Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile or offensive environment for that individual."

Someone who believes they have been the target of harassment or bullying, or a third party witnessing such behaviour, should not hesitate to seek help. The sooner this is done the better, even if they are not certain that it is bullying, but they feel that someone's conduct displays unwanted behaviour. Dealing with concerns early can often prevent situations escalating into more serious conflict and such requests for help should therefore always be treated seriously. In a local church, the minister, Church Secretary or chair of the local CRCW committee would normally be the first port of call. Where that is inappropriate, the synod moderator may be contacted. An allegation against a Synod Moderator should be directed to the General Secretary.

See also *Resource G5: Guidance on responding to allegations of bullying and harassment*. In some cases, it may be necessary to use the complaints process set out in Section Q of the Manual ([www.urch.org.uk/wp-content/uploads/2023/01/Q\\_Complaints\\_Procedure\\_2022.pdf](http://www.urch.org.uk/wp-content/uploads/2023/01/Q_Complaints_Procedure_2022.pdf)) or the Disciplinary Process ([www.urch.org.uk/wp-content/uploads/2023/07/Section-O-July-23.pdf](http://www.urch.org.uk/wp-content/uploads/2023/07/Section-O-July-23.pdf))



# Chapter three

## Safer activities



It isn't possible to guard against every eventuality, but churches can do their best to provide a safe environment by making sure they follow good working practice in every area of church life.

This applies to activities organised by the church, both on and off church premises, including:

- regular groups run by the church (eg junior church, Pilots, fellowship groups, Messy Church, lunch clubs) on church premises
- regular groups for children or adults at risk run by the church which take place on other premises (eg house groups in people's homes)
- pastoral visits in homes or hospitals
- occasional events (eg holiday clubs and outings, including events hosted in private dwellings)
- residential events (eg youth camps, all-age church weekends away)
- other work among children or adults at risk offered by the church (eg mentoring, detached youth work, prayer ministry)
- groups which include adults and children when children attend without parental supervision (eg all-age choir, music group or craft group).

### **Key practice points**

- Good practice in relation to 'safer culture' (eg safer recruitment, training, codes of conduct) provides a foundation for safer activities
- Health and Safety overlaps with safeguarding but needs to be considered separately
- Some general principles apply to activities with any age group (eg risk assessments, obtaining consent)
- Some guidelines are specific to particular activities with children or adults at risk
- Data protection requirements will be relevant in a number of ways such as safe storage of registration and consent forms, use of images, storage of notes from home visits.

### **Key responsibilities**

Local Church / Synod / Denomination:

- Ensure appropriate insurance is in place for buildings and activities
- Consider the implications of data protection and health and safety requirements for specific activities
- Carry out risk assessments for relevant activities or events
- Ensure adequate staffing for activities and that leaders have suitable training, are aware of relevant guidance, and agree to follow relevant *Codes of Conduct*.

Local church:

- The Hirer's agreement sets out the procedures to follow to ensure robust safeguarding practice when other organisations use church premises
- Seek advice from SSO for complex or sensitive risks.

Synod:

- SSOs to provide advice on managing complex or sensitive risks.

DSL / Denomination:

- Obtain legal advice where necessary on legal and regulatory requirements.



# Safer locations, buildings and facilities

## 3.1 Health and safety

Churches have a responsibility to provide a safe environment all who use their building(s), and so should take reasonable measures to minimise the chance of people getting hurt by ensuring appropriate Health and Safety processes are in place.

Health and Safety overlaps with safeguarding but those with specific responsibilities in safeguarding (eg Church Safeguarding Coordinator, Synod Safeguarding Officer) will not generally be responsible for Health and Safety matters so this is an area that needs to be considered separately.

Advice and guidance on Health and Safety matters is now provided separately on the URC website.

## 3.2 Lettings

Many local churches allow other organisations to use their premises. Those hiring the premises are responsible for ensuring that when children or adults at risk are present, appropriate legislation and best practice in connection with their supervision and safety is observed. They must also notify the Church Safeguarding Coordinator if any concerns arise relating to people or activities for which they are responsible. Further details are found in the Hirer's agreement (available from synods), which applies to all cases where premises are hired out to any individual or organisation.

If the hiring organisation is required to register with an inspection body such as Ofsted or the Care Inspectorate Wales (for example, if it is a nursery, pre-school or out-of-school-hours childcare), then the church should ask to see the registration certificate, and record that it has been seen.

All lettings should be reviewed annually. Your synod or Synod Trust may be able to offer advice or information about leasing and hiring of premises responsibilities.

*Please note: Groups which are sponsored by local churches (such as Scouts and Guides) will follow the safeguarding policy of their organisations. Partner groups (such as Boys' or Girls' Brigade and Pilots) will follow denominational policy while also ensuring compliance with their own organisational procedures.*

## 3.3 Church activities in private dwellings

The use of private dwellings can raise particular issues in relation to safeguarding, for example the presence of bedrooms and bathrooms, the potential for individuals to use private spaces within the

venue unobserved, and the presence of other people not part of the activity. Any church activities hosted in private dwellings come under the safeguarding policy of the church. See [www.urc.org.uk/safeguarding/guidance-for-urc-local-church-activities-in-private-dwellings/](http://www.urc.org.uk/safeguarding/guidance-for-urc-local-church-activities-in-private-dwellings/).



# General principles for safer activities

This section outlines some key guidelines relevant to a range of activities with different groups. More specific details for particular activities are then provided in sections 3.8-3.22 below.

## 3.4 Risk assessments

While it is not possible to avoid all risks when working with children or adults at risk, it is possible to try and minimise those risks. This can be achieved through careful planning and preparation and by providing a written record of the thought processes and actions taken. Risk assessments should be undertaken by the activity leader(s) before any activity takes place and retained in case they need to be seen at a later date, for example as a result of an accident taking place.

These are not onerous, and can be broken down into five easy steps:

1. Identify the risks / hazards
2. Decide who might be harmed, and how
3. Evaluate the risks (likelihood and impact) and decide on precautions / actions
4. Record findings
5. Regularly review and update.

In an activity risk assessment, it is important to take into account:

- the type of activity
- the space and setting being used
- the ages, abilities and special needs of participants in the group
- staff ratios
- levels of experience of staff
- contingency or emergency planning, such as what happens if a leader doesn't turn up, or if there is an accident and someone needs to be taken home or to hospital.

For more information and guidance on completing an activity risk assessment, see *Resource SA1: Risk assessment template (with guidance)*.

## 3.5 Insurance

Insurance cover is required to protect property, staff, volunteers and participants. The level and range of cover must be adequate, and should be reviewed annually. Insurance policies require the insured to take all reasonable steps to prevent injury, loss or damage occurring, and to follow legal, statutory and Charity Commission requirements and guidelines. Failure to take such precautions may impact the insurance arrangements, and therefore it is recommended for the insured to adopt the guidelines set out in this *Good Practice 6* document.

URC insurance is in place for Assembly-appointed staff to organise and lead nationally arranged events. However, this does not cover synod or local area events, which require their own insurance. All local churches should have their own insurance cover. Church policies should include public and employer's liability cover as standard but additional insurance will be required for specific events such as international trips or events involving higher-risk activities / sports.

It is recommended that all synods have indemnity insurance to cover them for any claims that might be made against them, including claims arising from the actions of their Safeguarding Officer, providing they have acted legally and responsibly.

The URC record retention schedule indicates that records documenting the arrangement and renewal of insurance policies should be kept permanently (given the potential for historic claims).<sup>23</sup>

## 3.6 Registration and consent forms

Where the church is running a dedicated service for children or adults at risk, good practice would be for all activities to have:

- i) a registration form
- ii) an attendance register.

All personal details and consent forms (either paper-based or digital) must be stored securely and not shared unless it is legally permissible to do so.

### Registration form

Registration forms should be updated annually, and include:

- name and address
- date of birth
- parent/carer contact details (or emergency contact details if different)
- medical information
- details of any additional needs, including any activities the individual cannot take part in
- any other information relevant to the activities, such as dietary requirements, or who is allowed to collect a child at the end of the activity
- consent for emergency medical treatment if a parent/carer cannot be contacted
- consent for photographs or videos
- consent for online communication between workers and children where relevant.

Separate consent should be obtained for one-off events or activities, including any outings or trips.

23 [www.bit.ly/3rPd6Hp](http://www.bit.ly/3rPd6Hp)

## Consent

It is good practice to ask children who have the maturity and mental capacity to make their own decisions about whether they want to be involved in an activity or whether their images can be shared. Most young people over 12 are likely to come into this category, although an assessment must be made based on their individual needs.

*Note: Consent from young people is not a replacement for parental consent. It's a way for the child or young person to be involved in the decision-making process.*

The following guidelines are suggested by the NSPCC:

Age of child or young person	Consent required
0-15 years	Parent or carer.
16-17 years, living at home	Parent or carer in most cases.
16-17 years, living independently or estranged from parents	Young person and social worker, youth worker or appropriate adult.

It is recognised that many 16-17 years olds have significant responsibility for key decisions in their lives. However, in most circumstances, parents have legal responsibility for their children up to the age of 18 and their consent will therefore be required. If it is felt that there are particular circumstances in which it may not be appropriate for consent to be requested of parents (when the child is still living with them), this should be discussed with a Synod Safeguarding Officer.

See also *Resource SA2: Information and consent form*.

## Attendance registers

Where possible, it is best practice to keep a record of the children and adults in attendance for groups and activities organised by the church. A register of attendance might include:

- the name and type of group or activity
- the date, time and venue of the group or activity
- a list of children present (ages may also be helpful)
- a list of adults present.

*Please note: URC guidelines on record retention indicate that records of children's activities and events (eg registers, risk assessments, consent forms, health and safety records) should be kept for 25 years after the date of the activity / event. [www.bit.ly/3rPd6Hp](http://www.bit.ly/3rPd6Hp).*

## 3.7 Insufficient workers for an activity

Ideally, there will be a pool of workers who have undergone safer recruitment procedures, and who can be called upon at short notice if other workers are suddenly unavailable. However, if no other safely recruited workers are available to stand in, the leaders who are present should carry out a dynamic risk assessment of the activity to decide if it is safe to continue with the number of leaders available. This might result in changing the planned activities to reduce risks. Decisions and reasons for any such alterations should be recorded. If there are adults willing to help who have not completed the safer recruitment process, they can assist alongside other workers but must not be left alone with children and must always be supervised by someone who has been

safely recruited. If it is decided that the risks to the participants' safety are unacceptable, then the activity should be cancelled.

*Please note: Under no circumstances should the church run children's groups with only one leader available.*



# Safer ways of working

This part of the guidance covers some specific aspects of church life relevant for all age groups. Sections 3.16-3.22 go on to look at particular topics for children and adults at risk.

## 3.8 Photography and filming

For convenience, this section uses 'images' to include still photographs, digital images or films. Images count as sensitive personal data under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) and should only be used with the consent of the person in the image.

### Images taken by church workers / for church purposes

#### Purpose and storage

- It must be made clear why images are being made, what they will be used for, who might see them and where they will be stored
- All images should be appropriate and respectful of the subject(s)
- Images should be stored in a secure location, ideally on a church computer. If this is not possible, it is important to record where the images are being stored.

#### Consent

- Consent forms should contain a section covering consent for use of images. This should specify how images will be used and options to give / withhold consent for different types of use eg some parents may be happy for images of children to be included in a resource used within the church but not on social media.
- If an adult lacks capacity to consent, do not use their image
- Permission should be obtained from parents / carers before images are taken
- Where age appropriate to do so, children should be asked if they want to be filmed or photographed (see table in 3.6 above for suggested age boundaries).

#### Privacy and protection

- Use group photographs of children where possible to ensure that individuals cannot be identified by any personal details such as their name, school badge, age or address
- Take particular care in cases where children may not wish to be photographed or filmed or where it may place them at additional risk (for example, where there has been domestic abuse or where they are living away from their family for their own safety).



See also *Resource SA2: Information and consent form*.

## **Images taken by attendees / participants / church members**

The use of smartphones and the ability to easily edit images digitally means that additional care needs to be taken regarding photos or videos taken ‘informally’ by church members or attendees of an event.

## **Images taken by parents / carers / other attendees**

Clarify and promote the photography guidelines for the event to all participants:

- Advise parents / attendees that there can be negative consequences to sharing images linked to information about their own or other people’s children on social media
- Advise that care should be taken about ‘tagging’ other people / their children online
- Make sure there are procedures to respond to and manage any concerns arising, including a named person for attendees to contact with any concerns about inappropriate or intrusive photography.

This can be achieved in various ways eg pre-event information, event programmes, signage around the venue, announcements during an event.

## **Images taken by participants themselves, eg young people**

For young people, you may wish to consider a discussion within the group regarding how they wish the images they take of each other to be used, and what restrictions they feel should be observed. This will be more meaningful and effective than a set of rules imposed by adult leaders.

## **3.9 Recording or livestreaming services**

As with photographs and images on websites / social media, some church members or visitors may not feel comfortable appearing in recorded or live services and for others it may compromise their safety.

### **Key points to note:**

- Adults appearing in livestream or recorded video must give their permission
- Consent from parents / carers will be needed for any video involving children
- Create a space in the building where people may sit and know they will not be included in any video (‘image free zones’)
- Ensure people know the service is being recorded and give them an opportunity to move to the designated part of the building where they will be out of camera shot
- Avoid singling out any individual in the congregation, use group shots in passing instead.

Further guidance will be added to the online Resources page as practice develops in light of changing technology.

## **3.10 Online safety and safe use of technology**

A policy statement about online safety, including the expectations of workers in their electronic communications with children and adults at risk, should be included in either the main safeguarding policy document for a local church or in a separate online safety policy.

The *Codes of Conduct* for working with children and adults at risk (see *Resources C1 and C2*) contain provisions relating to online communication. See also *Resource P3: Model church online safety policy*.

The URC Digital Charter also highlights the importance of social media and the internet being as safe a place as possible for everyone ([www.bit.ly/urcsocialmediaguidelines](http://www.bit.ly/urcsocialmediaguidelines)).

### 3.11 Video conferencing

Guidelines for maintaining safety when using Zoom or other video conferencing platforms include:

- Use subscription versions of platforms which contain more security measures than the free versions
- If a meeting is infiltrated by uninvited visitors it should be terminated immediately. If the meeting organisers feel that the breach poses any risk to participants, this should be reported to a safeguarding officer
- When using breakout rooms, ensure there are at least three people in each group
- For youth groups or other online meetings for children:
  - there must be a minimum of two leaders per breakout room
  - prevent participants from sending each other private chats.

See also *Resource P3: Model church online safety policy* and further guidance will be added to the online Resources page as practice develops in light of changing technology.

### 3.12 Driving

The safety of people being transported to and from church activities is the responsibility of whoever makes the transport arrangements. If parents / carers make those arrangements themselves, then they are responsible for ensuring the safety of those being transported. If the church makes the arrangements, safety becomes the responsibility of the church. Driving can also put someone in a position of power over others which could be misused by those seeking to cause harm. Appropriate procedures therefore need to be followed.

Where the church is making travel arrangements:

- Details of travel arrangements need to be in the consent form for any activity or event
- Safer recruitment procedures (section 2.4) must be followed for drivers who are not already children's / adult's workers
- Ensure drivers are aware that they will need appropriate insurance for their car, tax and MOT (*Resource SA4: volunteer driver agreement* gives an optional template that could be used)
- Those driving a minibus must have the appropriate D1 licence.

Additional options for promoting safe practice could include:

- An annual licence check can be undertaken for all drivers via the website below. The driver can obtain a check code, which can be passed to the church to check the licence. The code is valid for one single use within 21 days. Further information can be obtained from: [www.gov.uk/check-driving-information](http://www.gov.uk/check-driving-information).

### 3.13 Guidelines on touch

Church groups and activities should provide a warm, nurturing environment for children and adults, while avoiding any inappropriate behaviour, or the risk of allegations being made.



- All physical contact should be an appropriate response to the needs of the child or adult at risk, and not the worker
- Keep everything public. Giving someone a hug in the context of a group is very different from a hug behind closed doors
- Be sensitive to the individual's reaction to touch. If someone is not happy with physical contact, respect this and find another way of conveying your concern for them
- Touch with children should be age-appropriate, and initiated by the child (unless there are exceptional circumstances eg they need medical attention)
- As far as possible, be aware of the individual's culture, and the meaning touch has to them
- Workers should be able to monitor each other's behaviour with regard to touch and physical contact. They should feel safe and confident to check out issues, discuss any concerns and to challenge anything constructively which could be misunderstood or misconstrued.

### **Healing ministry and laying on of hands**

When prayer with the laying on of hands is ministered this should be done with the recipient's consent and understanding of what is being offered. Touch must be appropriate, and it is usually inappropriate to lay hands on the affected part. Hands laid on the head acknowledge the Lord's healing touch in body, mind, and spirit for the whole person including the affected part.

[www.bit.ly/urhealingministry](http://www.bit.ly/urhealingministry)

## **3.14 Supporting those with additional needs**

Churches should be sensitive to any additional needs, to enable all to participate as fully as possible. This includes being aware of:

- accessibility issues
- special educational needs and disabilities (SEND)
- dementia and memory issues
- mental health needs
- which children and adults at risk are carrying and taking medication themselves.

Group leaders / activity organisers need to know:

- who is required to administer medication, where medication is stored and who has access
- who on the team has appropriate knowledge and training to deal with medical issues
- circumstances in which participants may take non-prescription medicines such as painkillers
- emergency procedures, including the appropriate response for allergies, epilepsy or diabetes
- any specific instructions from parents/carers about a child's or adult's medical needs.

See also *Resource SA3: Request to administer medication form*.

## **3.15 Overnight stays**

When organising overnight stays and residential events, it is important that:

- there is a nominated safeguarding person(s), and all participants and leaders know who it is
- there is a qualified first aider in attendance
- a risk assessment of the venue and activities has been completed beforehand
- adequate insurance cover is arranged for any activities and the premises used
- participants provide emergency contact details, and have been given contact details of the leader or an identified worker
- all church workers have completed safeguarding training, and have sufficient disclosure and barring checks prior to the event
- all medical information and emergency contact numbers are easily accessible

- if using an established residential centre, confirmation is made that it has a suitable safeguarding policy, carries out training and criminal records checks on workers, and has full risk assessments for health and safety.

In the specific case of overnight stays with children, ensure that:

- consent forms have been completed, with medical requirements, travel and collection arrangements, sleeping arrangements, dietary requirements
- workers do not sleep in the same room as children, unless there are exceptional circumstances where children require supervision (eg medical needs)
- appropriate nightwear is worn
- changing and showering facilities are separate for children and adults. If there are limited facilities, timetables are used to ensure separate access times for children and adults.

Additional guidance on organising residential trips, including further guidance on issues of gender, sleeping arrangements and access to bathrooms, will be made available online.



# Safer working with children

*Resource C1 'Code of Conduct for working with children (Under 18s)'* underpins all work with children, including group activities, 1-1 interaction and online contact.

## 3.16 Ratios of leaders to children

The following adult-to-child ratios are required as the minimum numbers to help keep children safe (source: NSPCC):

Age of child	Ratio	
0-2 years	1:3	one adult to three children
2-3 years	1:4	one adult to four children
4-8 years	1:6	one adult to six children
9-12 years	1:8	one adult to eight children
13-18 years	1:10	one adult to ten children

- There must be at least two adults present, even with smaller groups
- Where possible, at least one female and one male leader should be present for mixed-gender groups. This is essential in the context of overnight stays
- Adults who assist on one or two occasions must be responsible to an appointed worker who has completed safer recruitment processes. If they start to help more regularly, they will need to complete appropriate training and safer recruitment processes themselves
- If there are young people helping to supervise younger children, only those aged 18 or over should be included as adults when calculating adult-to-child ratios.

These ratios are a minimum and may need to be increased to take into account the nature of the group, such as if children with additional needs will be present, the type of activities and the venue – activities spread across a number of rooms, outings and residential events, will require more adults.

*Please note: It is important to make sure parents and carers are clear about when the responsibility for the care of their children returns to them following the activities or events.*

The reality of church life is that getting enough people to help can be challenging. The guidance provided here is recommended 'best practice'. On individual occasions eg a Sunday in the summer holidays) it may not always be possible to meet all of the requirements outlined above but this should be the exception rather than the rule. However, the requirement to always have at least two adults present should always be followed without exception.

If only one adult is available to lead the activity, it should be postponed until an appropriate number of adult leaders are available. If it is consistently impossible to meet the recommended ratios, Elders will need to consider the sustainability of the children's work being offered and whether a different model could be used.

### **International trips**

The recommended ratio for international trips is:

Up to ten children	three adults
1–10 additional children	one additional adult: for example, 30 children would require a minimum of five adults

More detailed advice can be obtained from the International Relations department at Church House.

## **3.17 Young leaders**

Although the age of 18 marks the legal division between children and adults, it is recommended that a minimum three-year difference is required between the age of young workers and the age of the children they supervise.

The Police, Crime, Sentencing and Courts Act 2022 expanded the definition of 'positions of trust' to include those involved in teaching, training, supervising or instructing in a religion on a regular basis. It is illegal for an adult in a position of trust to be involved in sexual activity with a 16- or 17-year-old (even though they are over the age of consent). This may have implications for some young leaders and their relationships with people in their peer group or social circle. Please speak with the Church Safeguarding Coordinator or Synod Safeguarding Officer for advice if needed.

## **3.18 Lone working with children**

It is not advised that workers meet with children alone. However, if such a situation arises, such as a child wanting to discuss a personal matter with a worker, the worker should:

- inform the leader or a co-worker about the contact beforehand
- if possible and safe to do so, obtain the agreement of a parent / carer, but remember that telling a parent / carer might put the child at risk, depending upon what they wish to disclose

- meet in a public place, such as a room with an open door with other people present close by in the building. Avoid meetings in remote, secluded areas
- carefully consider the needs and circumstances of the child
- record and report to the leader any situation where a child becomes distressed or angry
- inform the leader or a co-worker when the lone working starts and finishes.

If a situation arises ‘out of the blue’ and is unavoidable, the group leader and / or Church Safeguarding Coordinator should be notified promptly afterwards.

### 3.19 Registration of some children’s activities with regulatory bodies

Churches in England which provide groups for children under the age of eight who attend regularly for more than two hours at a time, or for 14 days or more in any period of 12 months, will need to register these with Ofsted unless an exemption applies.

See [www.gov.uk/guidance/childminders-and-childcare-providers-register-with-Ofsted](http://www.gov.uk/guidance/childminders-and-childcare-providers-register-with-Ofsted).

If registration is not required, a church may still choose to join the voluntary part of the Childcare Register in some instances (for example, because being registered with Ofsted may help parents qualify for free childcare).

In Wales, similar registration processes apply in relation to provision for children under the age of 12. See [www.careinspectorate.wales/register-childcare-and-play-service](http://www.careinspectorate.wales/register-childcare-and-play-service).



# Safer working with adults at risk

*Resource C2 ‘Code of Conduct for working with adults (over 18s)’* underpins all contact with adults at risk, including group activities and 1-1 contact. As noted in the *Code of Conduct*, key principles for working with adults at risk include promoting empowerment and supporting people to make their own choices and decisions whenever possible.

### 3.20 Visiting adults at home

This guidance applies to ‘formal’ pastoral visiting done in the name of the church (rather than informal, neighbourly contact). Care must be taken to protect both those being visited and those doing the visiting. There should be accountability and transparency in the way in which church workers engage in lone working or home visits. The following guidelines are recommended good practice.

### Arranging visits

- Ideally let people know in advance that you are coming, particularly if it is your first visit
- If there are any concerns or risks known before a visit is made, visiting in pairs may be advisable, especially if you do not know the person
- Carry some identification on the first visit and be proactive in letting the person see it
- Carry a mobile phone and let someone know where you are and when you expect to return
- Ask the person whether they would like repeat visits, whether and how they would like to be contacted again, and so on. Leave them feeling fully in control of your contact with them.

### Providing care and support

- Be clear about what support you can offer and the purpose and limitations of any pastoral care / support that is available
- Do not make referrals to any agency that could provide help without the adult's permission, and ideally encourage them to set up the contact, unless there are safeguarding concerns
- Never offer 'over-the-counter' remedies to people on visits or administer prescribed medicines, even if asked to do so
- If you are asked to make any purchases, always retain receipts and return both them and any change to the person immediately. Keep a record of any transactions and the reason for them
- Take care regarding accepting any gifts other than token items, to avoid misunderstandings or subsequent accusations from the person or their family. If courtesy demands that you accept a small gift, declare it to someone at church, for instance an Elder or the treasurer, to ensure transparency. If someone wants to make a donation to the church, put it in an envelope, mark it on the outside as a donation and obtain a receipt from the treasurer.

### After a visit

- Make a note of the visit and store it in accordance with data protection requirements
- Notify the Church Safeguarding Coordinator of any concerns arising from a visit.

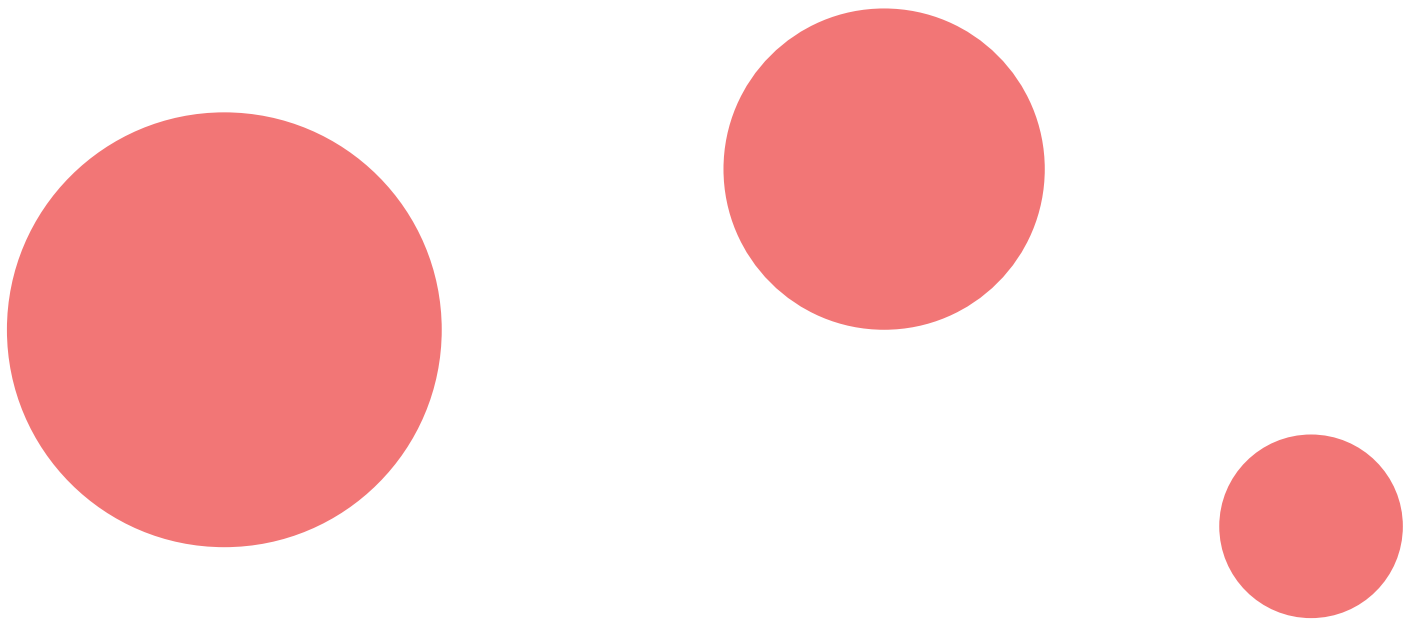
## 3.21 Financial matters

It is important to be aware of the possibility of financial abuse occurring within a church setting. If an adult at risk wishes to name a church worker as the executor of their will or asks them to take on power of attorney, this should be discussed with the Synod Safeguarding Officer. The worker may also wish to seek their own legal advice. Similar care should be taken when an adult at risk is considering a bequest to a church worker or a church and this should be referred to the Synod Safeguarding Officer for advice.

## 3.22 Support plans

In cases where it would be helpful to provide a written record of the support that a church can provide for an adult at risk, *Resource SA5: Template for a support plan* provides a suggested format for recording this.

**Key principles for working with adults at risk include promoting empowerment ...**



# Chapter four

## Recognising and responding to concerns

Developing a 'Safer Culture' and 'Safer Activities' will help to protect all those in contact with the Church but some concerns will still arise and it is important to know how to respond well.

Concerns can arise because of information someone discloses or something which is observed by others. This can relate to harm caused to an individual and/or forms of self-harm and self-neglect.

Important elements of responding well include: listening to concerns, recording information appropriately and considering who else may need to know.

### **Key practice points**

- Concerns can relate to abuse of children or adults, self-harm, or other vulnerabilities caused by factors such as ageing, illness or disability
- Abuse can take many forms and occurs in many settings, including within the church
- Responding well to concerns requires both sensitivity and clarity about the need to report information to relevant people and authorities
- Always seek advice on any situation if you are unsure about whether to report a concern or make a referral to statutory services
- Synod Safeguarding Officers must be informed of any situations in which statutory services are involved.

### **Key responsibilities**

Local Church:

- Promote awareness of different kinds of abuse and other vulnerabilities
- Seek to create a 'listening culture' and help people develop listening skills to respond appropriately in situations where sensitive information is disclosed
- Inform Synod Safeguarding Officer as a minimum of any situations where involvement from statutory services is / may be required
- Share information with statutory services as appropriate and co-operate with them during any investigations
- Report any serious safeguarding incident to the Charity Commission and notify the SSO.

Synod:

- SSOs will advise / lead when concerns about children or adults at risk need to be passed on to statutory services
- Ongoing liaison with statutory services when necessary
- Liaise with DSL on cases with particular complexity if required
- Support local churches to report serious incidents to the Charity Commission
- Synod Trusts should report serious safeguarding incidents occurring in buildings which they own to the Charity Commission.

DSL / Denomination:

- Provide additional advice in cases with particular complexity or high public profile
- Report serious cases related to ministers or the work of Assembly to the URC Trust who will notify the Charity Commission.



# Types of safeguarding concerns

Concerns can take different forms and arise from a variety of different circumstances.

## 4.1 Understanding and recognising abuse

The consequences and the pain of abuse are long-lasting and, for children who are abused, the effects are likely to reach into their adulthood.

### What is abuse?

Abuse is the violation of an individual's human rights, and it arises from misuse of the power and control that someone has over another. Abuse disrespects the (God-given) individual dignity and integrity of the person abused and usually undermines their sense of self-worth. It may consist of a single act or many repeated acts, and it can occur in any relationship with a child or adult. Abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.

### Who commits abuse?

Abusers come from all sections of society, and may well be perceived by others as respectable, reliable and trustworthy people. The majority of abusers are known to the victim and may often hold a position of trust or authority. Abuse may be perpetrated by an individual or a group, including:





## Who is at risk?

Anyone can be at risk, but some groups are more vulnerable to abuse than others.

Children are more at risk of being abused if they:

- have disabilities or learning difficulties
- have parents with substance misuse issues or other acute needs
- have caring responsibilities.

Adults are more at risk of being abused if they:

- are isolated and have little contact with friends, family or those around them
- have difficulties with their memory
- have problems with communication
- are dependent upon a carer, whether this is a family member, a friend or a paid worker
- have a carer who is reliant upon them for financial or emotional support.

## Where does abuse take place?

Abuse can take place in all kinds of different settings, including:



## Grooming

Churches offer excellent opportunities for children and adults at risk to grow in faith, and are often one of the main places where they develop appropriate trusting relationships with those outside family or formal education / employment settings. However, as a result of these positive characteristics, churches can also provide opportunities for someone to target and groom children and those who are vulnerable.

Grooming is when someone builds a relationship, trust and emotional connection with a child or someone who is vulnerable with the intention of manipulating, exploiting and abusing them. It can take place over short (days or weeks) or long (months or years) periods of time.

Groomers may also build a relationship with the victim's family or friends to make them seem trustworthy or authoritative. This could include members of the victim's family or people within the church. For example, an adult who wanted to abuse a child might spend significant time and energy building a friendship with the child's parents / carers, the minister and members of the congregation. By grooming the adults around the child, developing a reputation of respectability, helpfulness or popularity within the church, the abuser makes it more difficult for the child to

disclose abuse, or for adults who may know the individual well to accept even the possibility that there could be a cause for concern or, if allegations are made, that they could be true. It is also possible for a whole congregation to be groomed, sometimes by those holding positions of leadership within the church.

## 4.2 Types of abuse

Abuse can take many forms and often there will be more than one type of abuse occurring at the same time. For example, there is an emotional aspect to all types of abuse, including witnessing abuse. The lists below are not exhaustive but outline the main types of abuse for children and adults. Further details are given in *Resource S5: Signs and Symptoms of Abuse*.

### Definitions used in statutory guidance or procedures

#### England<sup>24</sup>

For children, there are four main types of abuse (taken from *Keeping Children Safe in Education 2023, Working Together to Safeguard Children 2018*).

<b>Physical</b>	A form of abuse which may involve hitting, shaking, throwing, burning or scalding, inappropriate restraint or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child, or misuses medication.
<b>Sexual</b>	Forcing or enticing a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.
<b>Emotional</b>	Persistent emotional maltreatment such as to cause severe and adverse effects on a child's emotional development.
<b>Neglect</b>	The persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of their health or development.

For adults, government guidance on the Care Act 2014 indicates ten main types of abuse.<sup>25</sup>

<b>Physical</b>	Includes: assault, hitting, slapping, pushing, misuse of medications, restraint, inappropriate physical sanctions.
<b>Sexual</b>	Includes: rape, indecent exposure, sexual harassment, sexual photography, inappropriate looking or touching, sexual teasing or innuendo, subjection to pornography; or witnessing sexual acts, indecent exposure, sexual assault, sexual acts to which the adult has not consented or was pressured into consenting.
<b>Emotional</b>	This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.
<b>Neglect and acts of omission</b>	This includes ignoring medical or physical care needs and failing to provide access to appropriate health, social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition, and heating.

24 Broadly similar to frameworks used in the Channel Islands and Isle of Man.

25 [www.bit.ly/3tsQkWi](http://www.bit.ly/3tsQkWi)

<b>Financial or material abuse</b>	This includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions, or benefits.
<b>Domestic abuse</b>	This includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological, emotional or other abuse by people who are intimate partners, ex-partners, family members or individuals who share parental responsibility for a child. It applies where both parties are aged over 16, but there is no requirement for the victim and perpetrator to live in the same household for the behaviour to meet the definition of domestic abuse.
<b>Organisational abuse</b>	This 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 own home. Organisational abuse can range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
<b>Self-neglect</b>	Broadly defined as neglecting to care for one's personal hygiene, health, or surroundings (including hoarding).
<b>Modern slavery</b>	This includes slavery, human trafficking, forced labour, and domestic servitude.
<b>Discriminatory abuse</b>	Abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act 2010.

## Wales

Wales Safeguarding Procedures set out five categories of abuse for both children and adults: physical, sexual, psychological, emotional or financial abuse. This includes abuse taking place in any setting, whether in a private dwelling, an institution or any other place.

<b>Physical</b>	<p>Children: deliberately hurting a child or young person including through physical restraint, inflicting burns, cutting, slapping, punching, kicking, biting or choking, stabbing or shooting, withholding food or medical attention, drugging, denying sleep, inflicting pain, shaking or hitting babies, fabricating or inducing illness (FII).</p> <p>Adults: This includes hitting, slapping, over or misuse of medication, undue restraint or inappropriate sanctions.</p>
<b>Sexual</b>	<p>Children: Contact abuse involves touching activities where an abuser makes physical contact with a child. Non-contact abuse involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet, flashing, encouraging a child to watch or hear sexual acts, not taking proper measures to prevent a child being exposed to sexual activities of others.</p> <p>Adults: This includes rape and sexual assault or sexual acts to which the adult has not or could not consent and / or was pressured into consenting.</p>

<b>Psychological</b>	Includes threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks, witnessing abuse of others.
<b>Emotional</b>	The ongoing emotional maltreatment of a child which can seriously damage a child's emotional health and development. Includes a wide range of behaviours such as trying to scare or humiliate a child, isolating them, scapegoating a child, exposing them to distressing events, failing to promote their social development.
<b>Financial</b>	Includes theft, fraud, pressure about money, misuse of money.

Further details can be found at: [www.safeguarding.wales/en/glossary/](http://www.safeguarding.wales/en/glossary/).

## Further examples of abuse

In addition, there are other types of harm that may not be specifically mentioned in legislation or statutory guidance, but which are relevant for safeguarding children and adults at risk. These often combine elements of the different types of abuse listed above.

### Child sexual exploitation (CSE)

This is where a child is coerced, manipulated or deceived into taking part in sexual activity. It includes physical contact, but also non-contact activities such as involving children in the production of sexual images, forcing children to watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

### Child criminal exploitation (CCE)

This is where a child is coerced, manipulated or deceived into taking part in criminal activity. It can include being forced or manipulated into transporting drugs or money through County Lines, working in cannabis factories, shoplifting, or pickpocketing, threatening / committing serious violence to others.

### Child-on-child abuse (sometimes known as peer-on-peer abuse)

This is any form of physical, sexual, emotional (including coercive control) or financial abuse directed at a child by another child of a similar age. Everyone directly involved in this kind of abuse is under the age of 18. It can take various forms, including serious bullying, online abuse, harmful sexual behaviour, consensual or non-consensual sharing of sexual images.

### Domestic abuse experienced by children

Children can experience domestic abuse by seeing and / or hearing the abuse within the family, or seeing the injuries or distress afterwards, as well as being directly targeted. They can also experience domestic abuse in their own intimate relationships (teenage relationship abuse).

### Child abuse linked to faith or belief

Abuse linked to faith or belief is where concerns for a child's welfare have been identified, and could be caused by, a belief in witchcraft, spirit or demonic possession, ritual or satanic abuse features; or when practices linked to faith or belief are harmful to a child.

### Radicalisation

This can apply to both children and adults who become susceptible to extremist ideology. This may occur directly through a relationship, through social media or other online material. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law,

individual liberty and the mutual respect and tolerance of different beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

### **Spiritual abuse**

This includes the inappropriate use of religious belief or practice, coercion and control of one individual by another in a spiritual context, or the abuse of trust or misuse of power by someone in a position of spiritual authority, such as a minister.

### **Mate crime**

This is a term used where people, particularly individuals with learning difficulties or mental health issues, are befriended with the intention of them being exploited and abused financially, physically, emotionally or otherwise.

## **Signs and symptoms of abuse**

It is important to be able to recognise the possible signs of abuse. Observing any of the signs or symptoms does not necessarily mean that a person is being abused; there could be perfectly ordinary explanations. However, the observation of multiple signs and symptoms, together with explanations which are inconsistent or do not ring true, should give more cause for concern. There can also be an overlap between the signs and symptoms for different types of abuse.

*Resource S5: Signs and symptoms of abuse* includes a more comprehensive table of definitions, signs and symptoms of the different types of abuse.

### **Key points to remember**

- All abuse involves the misuse of power
- Secrecy is fundamental to abuse continuing, and victims are often trapped before they know what has happened
- If a child sees or hears domestic abuse, this is considered to be child abuse
- Any type of abuse committed within the church can also have a negative impact on someone's faith and relationship with God.

## **4.3 Other safeguarding concerns**

In addition to being aware of different kinds of abuse, it is also important to be alert to other types of safeguarding concern including:

### **Dementia and memory loss**

Memory loss can obviously be very difficult and distressing for the individual. Particular concerns may arise if their behaviour is:

- putting themselves and / or other people in danger (eg hoarding which creates a fire risk)
- causing fear or alarm in others (eg unintentionally frightening a child or making inappropriate comments)
- out of character and not typical of their usual behaviour.

*Resource S5: Signs of possible dementia / memory loss* provides some prompts which might help to identify concerns and whether a formal diagnosis may then be needed.

## Self-harm and suicide risks

Self-harm is defined as: the intentional damage or injury to a person's own body. It is often used as a way of coping with, expressing or releasing overwhelming emotions and distress. It may also be about converting emotional pain into physical pain, expressing something that is hard to put into words, or giving the individual a feeling that they are in control.

Factors which may put a person at risk of suicide are complex but may include: a history of trauma or abuse; a family history of suicide, substance misuse, a serious or chronic health condition, prolonged stress, a recent tragedy or loss.

See 'Useful Links' on the Resources page for further information.



# Recognising and responding to safeguarding concerns

This section applies to any of the different types of concerns identified in 4.2. and 4.3 above.

## 4.4 The 4 Rs

The 4 Rs, which are universal in safeguarding, show us what to do if there are concerns about the safety and welfare of someone.

1. Recognise the concern.
2. Respond well, acting in an open and transparent way.
3. Record what has been seen, heard or said.
4. Report concerns, informing the appropriate people.

### Recognising the concern

You might become aware of concerns in different ways. For example:

- Something you see. This might be an injury or behaviour consistent with abuse and unlikely to have been caused another way; indications of abuse through artwork, play or posts on social media; or abuse witnessed first-hand
- Something you hear. Someone discloses to you abuse that they have experienced; abuse is disclosed by someone else who knows the person experiencing abuse; indications of abuse through language and conversation, perhaps that is inappropriate for the age or context
- Something that troubles you – that feeling that something is not right with a situation.

## It is important to act if you suspect abuse ...

### Key questions to ask yourself are:

- Does it look right?
- Does it sound right?
- Does it feel right?

In cases of abuse, victims are often reluctant to make direct disclosures. If the abuser is a family member or has shared a long-term relationship with the victim in a trusted setting, or holds a position of responsibility within the church, it can be especially painful for victims to acknowledge that abuse has been committed against them. Subsequently, it can be even harder for them to be open with others about what they have experienced, either at the time or at a later date. Sometimes concerns may arise because of changes in behaviour or physical appearance that you have noticed, or because of something another person has told you, rather than from a direct disclosure.

**It is important to act if you suspect abuse – don't wait until you are absolutely sure or have solid proof.**

Sometimes a perpetrator will disclose abuse themselves but may offer a minimised version of events. They may also be respected and well-liked within the church, which can affect people's judgement. Abusers may not only groom children or adults at risk, but may also manipulate others around them, making it more difficult for those who may know the individual well to accept even the possibility that there could be a cause for concern.

**If anyone is made aware that a person attending their church has been convicted of an offence against a child or adult at risk, or has had an allegation of this nature made against them at any time, they must immediately inform the Church Safeguarding Coordinator or the Synod Safeguarding Officer.**

## Responding well if someone discloses sensitive information

It can be difficult to hear a disclosure of abuse, or that someone is contemplating suicide, or is at risk of being harmed in other ways. If a person chooses to trust you with difficult and sensitive information, don't try to 'interview' them but focus on listening calmly to what they want to say.

### Listen and reassure

- Listen attentively
- Remain calm – be aware of your body language and non-verbal communication
- Reassure – they are not to blame and have done the right thing in telling you
- Do not promise confidentiality – tell them that this information needs to be shared. Always seek advice if you have any concerns and don't know what to do.

### Managing the conversation

- Ask open questions – Tell me, Explain to me, Describe for me (TED). Do not ask closed or leading questions, and don't try to investigate
- Repeat back what you have heard them say
- Avoid making comments or judgements
- Don't stop an individual who is talking freely about what has happened.

### Taking appropriate action

- Seek medical attention if necessary
- Explain to them what will happen next – tell them whom you are going to tell, and give them a timescale

- Don't confront those alleged to be responsible
- Keep quiet – once you have passed the details on to the relevant person, you should not tell anyone else about the disclosure – not even for prayer purposes.

*Please note: Investigating to see if your suspicions are true is not a correct response.*

Whenever someone reports that they are suffering or have suffered abuse or neglect, are at risk in other ways, or that they have caused harm to others, the initial response from all professionals and volunteers should be limited to listening carefully to what they say in order to:

- clarify the concerns
- offer reassurance about how they (and others who may be at risk) will be kept safe
- explain what action will be taken, and within what timeframe.

The individual must not be pressed for information, led or cross-examined, or given false assurances of absolute confidentiality, as this could make the follow-up more difficult and could prejudice police and other investigations.

## Recording information

Safeguarding records provide a history of what happened, summarise what the workers did, and ensure that when people move on the account is not lost. Records should include:

- who was involved – the names of key people, including actual or potential witnesses
- what happened – facts not opinions. Use the person's own words where possible
- where it happened – specific location and address
- when it happened – date and time
- who it was referred on to and, if known, what the outcomes were – what happened next, including full names, roles and contact details
- the name of the person completing the form / record, their signature and date.

Records should be written up as soon as possible after the event. They should be clear and concise, use the individual's own words, and avoid jargon. Notes should be relevant and factual, without including opinions or judgements. It is not your role to verify or prove that the information given is true.

It is important to write a record of what you have recognised, no matter how small or seemingly inconsequential it may appear. A church member or worker may only have made one small observation, but that piece of information may be vital when put together with other details to make the big picture. Use *Resource F1: Safeguarding Concern Form* to record your concerns. Where possible, use options to help keep the information secure eg password protected documents.

Handwritten notes made immediately after the event can act as evidence of them having been written at the time in a future court case. Therefore, these should be kept, even if the details are also later typed. All records should be kept securely, and only disclosed to the appropriate authorities. The Synod Safeguarding Officer will input relevant details on to the URC case management system.

## Reporting concerns and informing the appropriate people

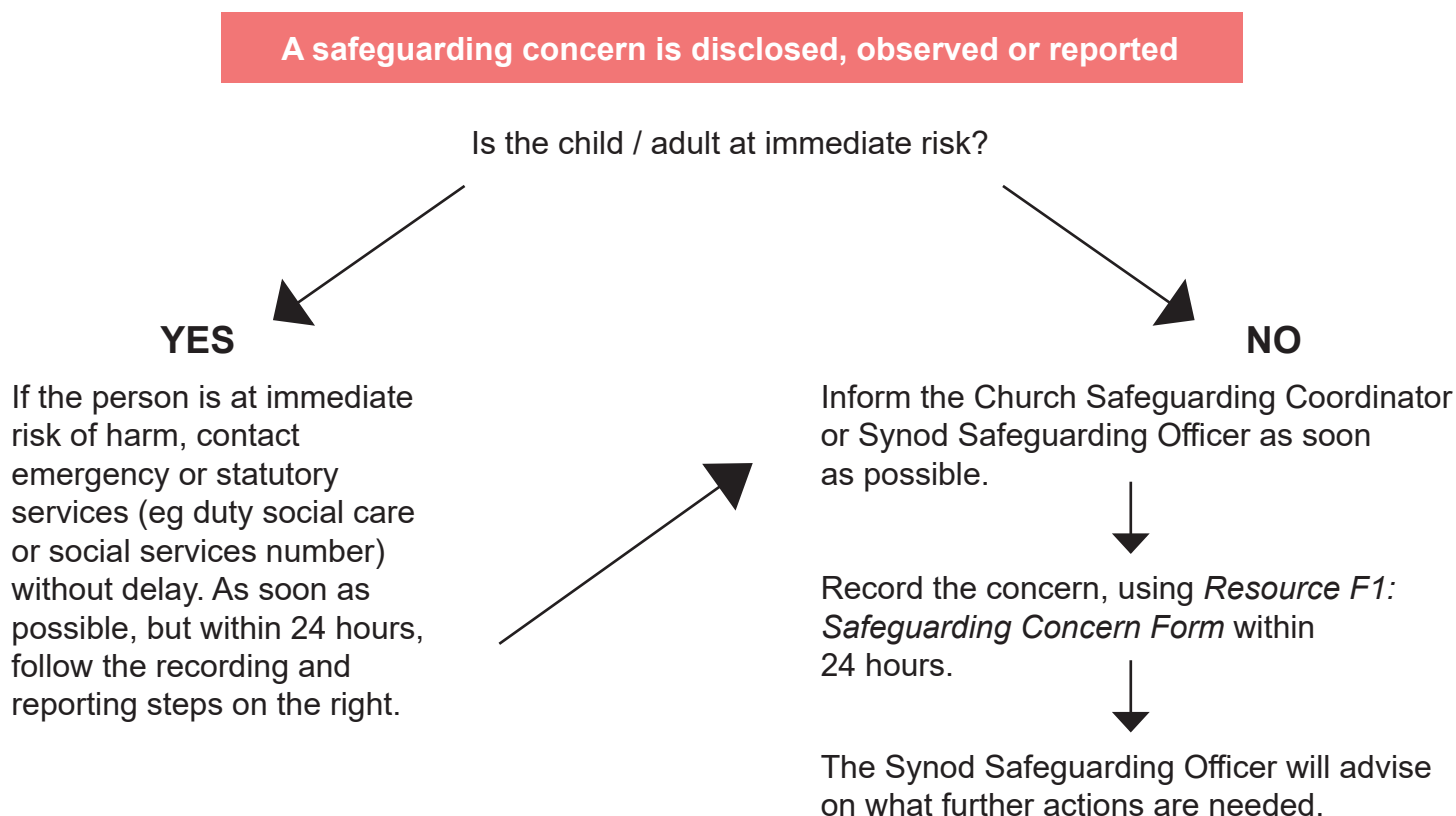
If you believe that a child or an adult may be suffering, or is at risk of suffering, significant harm, these concerns must always be acted on, as shown in the diagram at 4.5 below. Where there is a concern that someone is at immediate risk of harm, you should contact statutory services as soon as possible (see also sections 4.8-4.9 below). All other concerns should be reported to your Church Safeguarding Coordinator or Synod Safeguarding Officer within 24 hours. The only exception is if they are the subject of the concerns, in which case you must report it to the URC



Designated Safeguarding Lead (DSL). If the concern is about the DSL, this should be reported to the Deputy General Secretary for Discipleship. Under no circumstances, however, should you contact the person who is the subject of allegations, or share information disclosed to you with them.

## 4.5 Summary: who to inform about a safeguarding concern

The diagram below summarises the process of who to contact when a concern occurs.



## 4.6 Adult disclosures of historic abuse

If someone has chosen to disclose historic abuse to you, it is important to establish:

- whether they are safe from harm now
- whether they know what happened to the person who abused them
- what the person would like to happen next
- what would be helpful to them.

The process shown in the diagram in section 4.5 above also applies here. If the information disclosed indicates that other people are at immediate risk of harm then statutory services must be informed.

For other cases, the information must still be reported to the Church Safeguarding Coordinator or Synod Safeguarding Officer, even if the events happened a long time ago. Where possible this should be done with the consent of the person disclosing their abuse, but if they do not want to give consent for their personal information being shared, concerns can still be recorded with anonymised details and advice sought from the Synod Safeguarding Officer.

In situations where a perpetrator may still be in a position to inflict harm, it can be helpful to reassure the individual who has disclosed abuse that you will be passing on the information in order to keep other people safe and there would be no pressure on them to make a statement about their own experience unless they felt they wished to do so.

If you become aware of historical abuse, but not directly from the person who has been harmed, the same process applies. Where someone discloses past abuse that occurred in another denomination, the Synod Safeguarding Officer will need to liaise with safeguarding staff in the other denomination to share information as appropriate and agree what action may be needed.

## **4.7 Responding to concerns of abuse when an alleged perpetrator is a paid worker, minister or volunteer in the Church**

If you believe the alleged perpetrator of abuse against children or adults at risk, is a worker (paid or volunteer), or a minister, you must immediately contact the Church Safeguarding Coordinator. If you believe the Church Safeguarding Coordinator has a relationship with the people involved, or other potential conflict of interest, seek the advice of the Synod Safeguarding Officer. If you believe the Synod Safeguarding Officer may have a potential conflict of interest, contact the URC Designated Safeguarding Lead (DSL) for advice.

This applies whether the concern relates to current or historic abuse. The Synod Safeguarding Officer will agree on the appropriate next course of action, will contact the statutory agencies as appropriate, and consider whether other investigative / disciplinary procedures are needed (see chapter five).



# **Informing statutory services of concerns about a child or adult at risk**

Reporting a concern to external agencies can be difficult, particularly when an individual or family is known and respected within the church community. If you are in any doubt about whether to report a situation, contact your SSO or your local Children's Services / Adult Social Care / Regional Safeguarding Board (Wales) for advice. You can explain the circumstances without providing the name of the person involved.

*Please note: Records should be kept of all conversations and any decisions made. There are some differences in terminology used for this process. For example, in Wales it is known as a 'duty to report' and in England it is usually known as a 'referral'.<sup>26</sup>*

It is preferable for any external referral to be made by the Church Safeguarding Coordinator or Synod Safeguarding Officer, but if it is an emergency or they are not available, anyone can do it. A record should be kept and given to the Church Safeguarding Coordinator or the Synod Safeguarding Officer without delay, and definitely within 24 hours of a referral or report being made.

## 4.8 Referrals / reports about children

Children's Services (England) or Regional Safeguarding Boards (Wales) should be contacted when:

- you think that a child is currently suffering, or is at risk of suffering, serious harm
- there are indications of abuse or neglect
- you are aware of domestic abuse within the home/family.

Incidents of domestic abuse should be referred because of the emotional impact that witnessing domestic abuse has on children, and the increased risk of physical abuse, sexual abuse or neglect.

### Consent

Consent is not a condition of making a referral about a child. Where practicable, concerns should be discussed with the parent, and agreement sought for a referral to Children's Services, unless seeking agreement is likely to place the child at risk of significant harm through delay, or through the parent's actions or reactions. An example would be where there are concerns or suspicions that a serious crime such as sexual abuse or induced illness has taken place. Where the parent refuses to give permission for the referral, further advice should be sought from the Synod Safeguarding Officer, unless it would cause undue delay.

If, having taken full account of the parent's wishes, it is still considered that there is a need for referral, then:

- the reason for proceeding without parental agreement must be recorded
- the parent's withholding of permission must form part of the verbal and written referral to Children's Services
- the parent should be contacted to inform them that, after considering their wishes, a referral has been made.

If the child can understand the significance and consequences of making a referral to Children's Services, they should be asked their view. However, it should be explained that while their view will be taken into account, the professional or the volunteer has a responsibility to take whatever action is required to ensure the child's safety, and the safety of other children.

**If you are in any doubt about whether to report a situation, contact your SSO**

26 For the Crown Dependencies, see Jersey <https://safeguarding.je/about/>; or Guernsey <http://iscp.gg/>; or Isle of Man [www.safeguardingboard.im/](http://www.safeguardingboard.im/)

## Peer-on-peer abuse

There can be particular challenges in responding to peer-on-peer abuse, where all those involved are under 18. Many patterns of behaviour might, understandably, alarm adults. These range from playful experimentation which unintentionally goes too far, all the way through to serious sexual assault. Children, particularly in younger age groups, may engage in such behaviour with no knowledge that it is wrong or abusive. Help and support should be given for any children whose behaviour towards their peers is a cause for worry, as well as for those children on the receiving end of peer-on-peer abuse. Seek advice from the Synod Safeguarding Officer in such situations.

## 4.9 Referrals / reports about adults at risk

Adult safeguarding should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control, as well as improving quality of life, wellbeing and safety. Wherever possible, safeguarding concerns should be discussed with the adult to get their view of what they would like to happen, and keep them involved in the safeguarding process.

A fundamental difference between safeguarding adults and children is that adults are presumed to have capacity for making their decisions, and the freedom and right to make choices about their life, unless the law restricts them from doing so, or they are assessed as lacking mental capacity.

This can mean that people at risk of abuse may wish to make choices that others deem unwise, and which perhaps expose them to future harms. It can include situations when a person is harmed or abused by a friend or family member and chooses not to press charges. This can be a difficult area for churches, particularly where there are pastoral relationships with both parties.

### Mental capacity, abuse and the right to choose

When deciding whether an adult can protect themselves from abuse and harm, it is important to consider the extent to which they can understand information and make decisions. This is known as 'mental capacity'. The starting assumption must always be that a person is able to make a decision, unless it can be established that they lack mental capacity. For example, someone with severe dementia is unlikely to have the mental capacity to make significant decisions. One of the difficulties associated with mental capacity is that it can fluctuate. Someone may lack capacity at one moment, and later on may be fully able to make decisions, having received and understood information. Some adults may have capacity to make some decisions but not all. Lacking mental capacity is not a fixed state, even though the physical or mental symptoms, illness or disability that reduce capacity can be permanent. For this reason, when health or social care professionals test a person's mental capacity, it will only ever relate to the decision that is being considered. Churches can get advice around mental capacity from their Synod Safeguarding Officer or their local Adult Care Services.

### Consent

Ideally, the person experiencing the abuse will either contact statutory authorities directly, or give you their consent to make contact on their behalf. Sometimes this may not happen. If no consent is given because the individual appears not to understand you, and is unable to tell you what they would like to happen next, this could be because of a lack of mental capacity. By taking action and reporting your concern, it is likely that you will be acting in the person's best interests to keep them safe from harm.

Where the person appears to understand that inaction creates further dangers for them, and chooses not to take action, you nevertheless still have a duty to share information with the Synod

Safeguarding Officer (or Church of Scotland Safeguarding Service), and Church Safeguarding Coordinator in circumstances which indicate that they or others are at continued risk: Examples would include:

- The alleged perpetrator is employed in a position of trust or works with adults at risk which means other people may be endangered
- A criminal offence may have been, or could be, committed
- There is a serious and high risk to the safety or life of the person
- The alleged perpetrator works for the church, whether paid or unpaid (see section 4.7).

## 4.10 What happens after raising a concern with statutory services

Once an external referral or report has been made, there are several options open to the statutory services, including assessments, strategy meetings, case conferences, investigations and interventions.

In some situations, the reporter might NOT be contacted, and may not be kept informed or given updates. This can be frustrating, but it is important for maintaining confidentiality. If there is a statutory investigation ongoing, this takes precedence over any internal URC procedures.

### **Pastoral care**

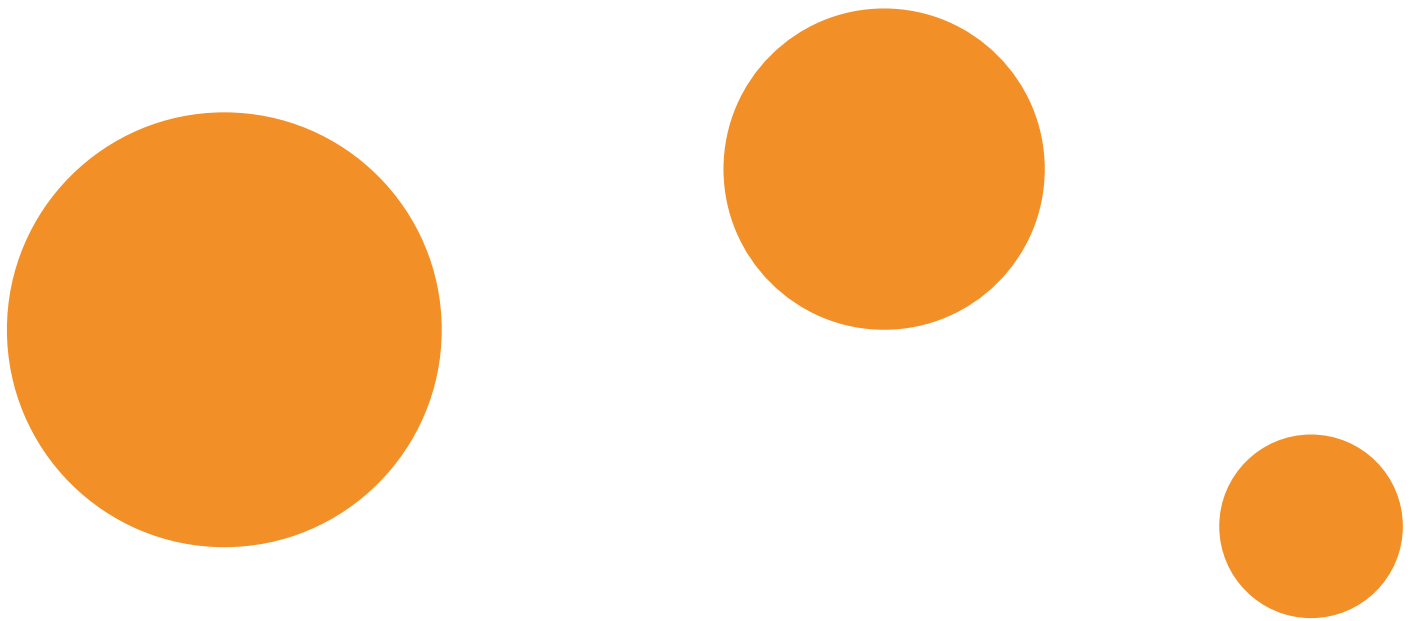
Pastoral support offered at the local church is paramount. Disclosing and sharing can be difficult for victims and for others in need of significant support, and it is important that pastoral care is available for them. Pastoral care is one of the responsibilities of the Elders' Meeting, which is exercised jointly by the Ministers and Elders of the church. Ministers and Elders need to relate with compassion, kindness and within appropriate boundaries, taking slow steps to avoid raising expectations and causing additional damage by being unable to deliver what might be promised as a church. The Synod Safeguarding Officer should be informed and kept up-to-date if any further concerns emerge.

This can be a difficult area for churches, for example, where a member makes an allegation against another member who says they have been unfairly accused. In such situations, different people would need to be involved in providing support for each party (see also section 5.6 below).

See *Resource L1* for contact details for organisations and specialist services who may be able to provide additional support.

### **Notifying charity regulators**

In some cases it will be necessary to make a report to the Charity Commission (or relevant regulator for other jurisdictions). See section 5.3 below for further details.



# Chapter five

## Managing allegations and people who may pose a risk to others

Where allegations are made against individuals within the Church, the URC is committed to following all required investigative and regulatory procedures. The URC believes it is called to share its ministry with all people. As a result, congregations may have people within their membership who are suspected or accused of causing harm or are known to have caused harm to others. The duty to share God's universal offer of love and forgiveness places a duty on all within the URC to ensure that those who pose a potential risk are welcomed to participate in church life in ways which do not compromise the safety of others.

This can be a complex area and nobody should try to manage it on their own. It needs to be a collaboration between the local church, Synod, wider Church staff, statutory agencies and other organisations.

### **Key practice points**

- Referrals to statutory services will be needed when allegations meet the relevant criteria
- Investigations by statutory services take priority over internal URC procedures
- Trustees are required to notify the Charity Commission of serious safeguarding incidents
- SSOs must be involved where someone is considered to present a risk of harm to others
- Managing risks effectively involves a combination of monitoring and setting boundaries alongside the provision of pastoral care and professional support.

### **Key responsibilities**

Local church:

- Co-operate with any investigative or disciplinary procedures
- Inform the SSO immediately on becoming aware of anyone in the church who may present a risk to others
- Work with the SSO and contribute relevant information for risk assessments
- Alert the SSO or statutory agencies to known breaches of a safeguarding agreement.

Synod:

- Contribute to disciplinary process where required / appropriate
- Moderator will advise the General Secretary if an allegation involves a minister and statutory agencies decide to proceed with an investigation
- Report serious safeguarding incidents occurring in buildings owned by the Synod Trust to the Charity Commission
- SSO to lead / advise on risk assessment and drawing up safeguarding agreements
- SSO to represent the local church in multi-agency meetings such as Multi-Agency Public Protection Arrangements (MAPPA) or other professional meetings.

DSL / Denomination:

- Provide additional advice in cases with particular complexity or high public profile
- DSL to lead / advise if a situation arises where the SSO has a conflict of interest
- The URC Trust will report to the Charity Commission if a case is related to the work of the Trust.



# Managing allegations against Church workers

The URC believes that any allegations of abuse or inappropriate conduct by paid staff, ministers or volunteers need to be dealt with in a careful, thorough and fair way.

If an allegation relates to a minister, the Synod Safeguarding Officer should always be informed. They will notify the Synod Moderator who will then inform the General Secretary.

*Please note: Statutory processes always take precedence and churches should not undertake any investigatory process until statutory agencies have advised this can take place.*

## 5.1 Referrals to statutory services

### Allegations against those working with children

We endorse and follow the guidance issued in Working Together to Safeguard Children 2018<sup>27</sup> and the Wales Safeguarding Procedures<sup>28</sup>, which emphasise organisational responsibility with regard to people who hold positions of trust in a range of settings, including faith-based organisations, and which detail clear criteria for a referral to the police or statutory services. Any allegation against people who work with children should be reported immediately to the line manager of the worker, the minister of the local church or the Church Safeguarding Coordinator. Church Safeguarding Coordinators must inform the SSO who will inform the [Local Authority] Designated Officer (England)<sup>29</sup> or the Local Safeguarding Board in Wales.

#### Criteria for making a referral / report

A referral or report must be made within one working day of all allegations that come to a church's attention, where it is alleged a worker has:

- behaved in a way which has harmed a child, or may have harmed a child
- has, or possibly has, committed a criminal offence against or related to a child
- behaved towards a child in a way which indicates they may pose a risk of harm to children.

These procedures may also be used where concerns arise about:

- a person's behaviour in their personal life, which may impact upon the safety of children to whom they owe a duty of care
- a person's behaviour with regard to their own children.

27 Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children', Department for Education, 2018. [www.bit.ly/3tvnuob](http://www.bit.ly/3tvnuob)

28 [www.safeguarding.wales/en/chi-i/chi-i-c5/](http://www.safeguarding.wales/en/chi-i/chi-i-c5/)

29 Different terms are used in different parts of the country, either Local Authority Designated Officer (LADO) or Designated Officer (DO).





If an allegation requiring immediate attention is received outside normal office hours, the out-of-hours emergency team or police should be contacted, and the [Local Authority] Designated Officer or Local Safeguarding Board in Wales informed the next working day.

### **Role of the [Local Authority] Designated Officer or Local Safeguarding Board**

Their role is to provide advice and guidance to employers and voluntary organisations, including the faith sector, where there are concerns about a worker in relation to children. They will first establish, in discussion with the referrer, whether or not the allegation falls within the scope of their procedures, and whether or not it appears to have sufficient foundation. They help coordinate information-sharing with the right people, and also monitor and track any investigation, with the aim of resolving it as quickly as possible. Contact details for statutory services should be included in each church's safeguarding policy. They can also be found on Local Authorities' websites.

Information that will need to be provided includes:

- what was said, and by whom
- any action taken
- whether the parents / carers of the child have been informed
- the name, date of birth and address of the member of staff and the child / children involved
- whether or not there are any witnesses
- details of any previous strategy meetings / discussions about the worker in question.

Depending on the nature of the allegation and on the urgency of the referral, statutory services may decide that a strategy discussion is appropriate. The aim is to gain fuller information and discuss immediate steps, such as whether the member of staff should be suspended (see section 5.2 below for further details on suspension and other disciplinary procedures), or if there is an alternative way of ensuring proper enquiries can be undertaken. Advice will be given about whether, when and what information can be given to the staff member about the investigation.

An investigation against a worker may have three related, but independent, strands:

- child protection enquiries relating to the safety and welfare of any children who are, or may have been, involved
- a police investigation into a possible offence against a child
- consideration of disciplinary action, including the possibility of suspension.

If the police or Children's Services decide to investigate, it is likely that they will advise that internal investigations should wait until the outcome of the statutory investigations.

### **Allegations against those working with adults**

Local Adult Social Care Services should be contacted with concerns about a worker's conduct with adults. The Synod Safeguarding Officer must always be informed of this contact to provide a coordinated response to consultation with statutory authorities and management of these allegations.

#### **Criteria for making a referral / report**

A referral should be made when there is concern that someone has:

- behaved in a way which has harmed, or may have harmed an adult
- has, or possibly has, committed a criminal offence against or related to an adult
- behaved towards an adult in a way which indicates they may pose a risk of harm to adults with care and support needs.

#### **Role of Adult Social Care Services / Local Safeguarding Board**

Their role is to make proportionate enquiries (or to make sure that, as the lead agency, enquiries are carried out by the relevant organisation) where there is a concern about the possible abuse or neglect of an adult at risk.

Information that will need to be given to the Social Care services / Local Safeguarding Board includes:

- nature of the alleged abuse
- relationship between the worker and the adult at risk
- details of whether the person posing a risk is living with the adult at risk
- details of any previous concerns / discussions about the worker in question
- any actions already taken.

An enquiry is any action that is taken (or instigated) by a local authority, under the Care Act 2014 (England) or Social Services and Well-Being (Wales) Act 2014, in response to indications of abuse or neglect in relation to an adult with care and support needs who is at risk and is unable to protect themselves because of those needs.

Where a formal safeguarding enquiry is being undertaken, an investigation concerning allegations against a worker can be carried out as part of the enquiry process. Adult Social Care services will advise on the approach needed and whether / when to involve the police or other services.

## **Informing the member of staff**

The worker who is the subject of the allegation needs to be informed as soon as possible after consultation with statutory services. Where it is likely that the police and / or Children's Services / Adult social care will be involved, an agreement needs to be made regarding when, and what, information can be disclosed to the worker in question. This agreement will involve the line manager of the worker, in consultation with the Synod Safeguarding Officer, and those agencies.

If the alleged misconduct involves sexual abuse or other allegations of child abuse where there is a risk that the alleged perpetrator may destroy evidence, the police must be consulted before the person is informed about any action, as the police must be given the opportunity to investigate first.

If the staff member is a member of a trade union or a professional association, they should be advised to seek support from that organisation.

## **Informing others**

If the Church Safeguarding Coordinator, or any other person in the church, makes a referral or report to statutory services, the Synod Safeguarding Officer must always be informed.

Where there is potential reputational risk to the Church, the SSO should inform the URC Press Office and / or the URC Designated Safeguarding Lead. The SSO will also determine who will inform the Minister and Moderator. If the situation involves a minister, and statutory agencies decide to proceed with an investigation, the Moderator will advise the General Secretary.

### **Parents / carers**

There are some circumstances where a church may need to directly advise parents / carers of an incident involving their child. In these circumstances, care should be taken not to say anything which could jeopardise the conduct of a proper investigation. The DO will be able to advise on this.

### **Church family / congregation**

It is possible to share generalised details to make people aware of an alleged incident, for example:

*'A possible safeguarding incident has occurred and our church safeguarding procedures are being followed. Owing to our desire to respect everyone's right to confidentiality, we are unable to share details. We ask that you respect this, avoid speculating about the people or circumstances concerned, and trust that every step is being taken to ensure our church is as safe a place to be as we can make it. If we are able to tell you any further information, we will do so. However, we may not be in a position to give any other details for some time. If you have any concerns of a safeguarding nature, please contact the Church Safeguarding Coordinator. Please pray for all involved.'*

When it is necessary for such a statement to be made, this should be agreed with the Synod Safeguarding Officer and the URC Communications Team.

## **Concerns which do not meet the threshold for referral to statutory services**

Concerns which fall outside the above criteria may still amount to inappropriate conduct. The church should seek advice from the Synod Safeguarding Officer (or Church of Scotland Safeguarding Service) to decide whether to handle this by way of advice, supervision, training, disciplinary processes, or a combination of these. A record should always be kept of all allegations made.

## **5.2 Investigative and disciplinary procedures**

It is in everyone's interests to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Every effort should therefore be made to avoid any unnecessary delay. The aim is to complete most cases as quickly as possible, although cases which require a criminal prosecution, or a complex police investigation will inevitably take longer.

### **Suspension**

Following discussions with statutory agencies, a decision will be made about whether to suspend a worker who is the subject of allegations, or to move them to a role which does not involve working with children or adults at risk. This action protects the worker from further allegations of abuse, protects the organisation from allegations of not dealing with the situation appropriately and, most importantly, protects the child from possible further abuse or intimidation.

Staff or volunteers should not be suspended automatically, and strategy meetings may discuss alternative courses of action. However, suspension should always be considered where there is reason to suspect a child is at risk of significant harm, an allegation warrants investigation by the police, or an allegation is so serious that it might be grounds for dismissal.

Suspension of a worker, pending the outcome of an investigation, should be carried out in consultation with the statutory authorities. Timing can be crucial, as the police and statutory services need to be able to conduct investigations which are not compromised by a premature suspension. Suspension is not disciplinary action in itself, and does not imply guilt. Rather, it is a precautionary measure which is taken where serious allegations are raised, in order for an appropriate investigation to be undertaken.

### **Process**

The exact procedures to follow will depend on the individual's role within the church.

<b>Minister / CRCW</b>	as set out in Section O of the Manual
<b>Employee</b>	as set out in URC / Synod / Local Church disciplinary process
<b>Office Holder</b>	as set out in Disciplinary Process for Office Holders.

### **Ongoing involvement in church life**

If the suspended worker wishes to remain involved in the life of a church, then it may be necessary to put in place a safeguarding agreement following a risk assessment (see 5.12 below). This is to protect children or adults at risk from any potential risk of harm. In this instance, the Synod Safeguarding Officer must be contacted for advice. This risk assessment and agreement should be produced in consultation with all statutory services involved.

Only relevant people in the church should be made aware of the allegation and subsequent suspension. This may include the Church Safeguarding Coordinator, minister and an Elder nominated to be responsible for safeguarding.

Further guidance for workers can be found in *Resource G6: A guide for staff facing safeguarding allegations*.

### **Criminal investigations**

If a criminal investigation is initiated, the church / synod must cooperate with the police at all times.

Commenting on matters under investigation should be avoided, unless invited by the investigating team at a formal meeting or in discussion with the Synod Safeguarding Officer. Any comments should be restricted to known facts and first-hand knowledge. The police advise that the parties should not communicate with each other about the allegation to prevent the contamination of evidence.

The police will keep the victim of the investigation regularly updated and this is generally done by the allocated officer in the case. There are no set timelines for this to happen as the updates are agreed by the victim with the police and these are individual to each victim and case being investigated. Some investigations are protracted and can take a significant amount of time to complete. The police will also keep the employer informed of progress and outcomes. Safeguarding actions taken (such as suspension or use of a safeguarding agreement) should always remain in place until a criminal investigation has concluded.

The police will gather their evidence and seek advice from the prosecuting authorities regarding the level of evidence needed in order to proceed through the courts. Prosecutors also consider whether or not taking the case to court is in the child's / adult's or the public interest. There are many reasons why a particular case may not come to court or may result in a 'not guilty' verdict. One reason is that the prosecution must prove the case beyond reasonable doubt in order to obtain a conviction. If a case does not go to court, or there is a finding of 'not guilty', this does not mean there are no further risks. Other measures may be needed, as described below, including disciplinary proceedings, referral to the DBS / Disclosure Scotland, risk assessments or other actions to address unresolved concerns.

### **Disciplinary proceedings**

If the prosecuting authorities decide against criminal proceedings, a disciplinary process must always be considered. Disciplinary proceedings carry a lower burden of proof than criminal proceedings. The employer must be satisfied that in all probabilities it did happen, rather than having to prove that it happened beyond reasonable doubt.

The police may be able to share some details of their investigation with the employer. The Synod Safeguarding Officer will be able to advise on how to proceed with both the internal investigation, and any subsequent disciplinary action.

If the employer (church or other body of the Church) has a reasonable belief that the individual has acted inappropriately and that it is no longer tenable for them to continue in their role, then it is acceptable to dismiss a person from it, whether it is paid or voluntary.

If the allegations are against a minister and disciplinary action is needed, the Synod Moderator will instigate Section O (the URC's disciplinary procedure for ministers), if the process has not already begun. If the allegations are against an office holder, the Disciplinary Process for Office Holders (Paper H2 General Assembly 2021) can be used. If the behaviour of concern does not meet the threshold of 'misconduct' for Section O (ie behaviour which undermines the credibility of a person's ministry or the Church's witness), then it may be appropriate to consider whether the Section Q complaints process would be relevant.

### **Resignations and compromise agreements**

If a person tenders their resignation during an investigation or before one is started, the investigation should be continued. It is important to try to reach a conclusion. In practice, continuing to investigate without the compliance of the worker can prove very difficult indeed. However, employers are expected to be able to show evidence that they have done as much as they can to reach a conclusion which can be properly recorded.

Compromise agreements by which a person agrees to resign, the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, must not be used in these cases without legal advice, and careful consideration of any safeguarding issues. In any event, such an agreement will not prevent a thorough police investigation where appropriate, nor can it override an employer's statutory duty to make a referral to the Disclosure and Barring Service and the Charity Commission where circumstances require it.

### **Employment references**

Decisions about whether to give details of a disciplinary investigation in references provided for employees or volunteers will depend on the circumstances of the case. Advice should be sought from synod and / or Church House staff in such situations.

## **Referral to the Disclosure and Barring Service (DBS) / Disclosure Scotland**

The law (The Safeguarding Vulnerable Groups Act (SVGA) 2006 in England and Wales and The Protection of Vulnerable Groups Act 2007 in Scotland) places duties on organisations to refer individuals, when certain prescribed conditions are met, to protect vulnerable people from harm. This applies to local congregations, volunteers and paid staff when the URC has withdrawn or removed a person from working or volunteering with children or adults at risk in regulated activity or would have done so had that individual not moved on through resignation, retirement or redeployment.

A referral must be made to DBS to consider whether to add the individual to the barred list because the person has:

- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence such as a serious sexual or violent offence
- engaged in relevant conduct in relation to children and / or vulnerable adults; an action or inaction has harmed a child or vulnerable adult, or put them at risk of harm

- satisfied the harm test in relation to children and / or vulnerable adults, eg there has been no relevant conduct but a risk of harm to a child or vulnerable adult still exists.

Relevant conduct is conduct which:

- endangers, or is likely to endanger, a child or vulnerable adult
- if repeated against, or in relation to, a child or vulnerable adult would endanger, or be likely to endanger, them
- involves sexual material relating to children (including possession of such material)
- involves sexually explicit images depicting violence against human beings (including possession of such images)
- is inappropriate conduct of a sexual nature involving a child.

A person's conduct endangers a child or vulnerable adult if they:

- harm a child or vulnerable adult
- cause a child or vulnerable adult to be harmed
- put a child or vulnerable adult at risk of harm
- attempt to harm a child or vulnerable adult
- incite another person to harm a child or vulnerable adult.

This is a statutory duty which applies to churches and, therefore, a failure to submit a referral in such circumstances is a criminal offence. The duty applies in respect of all staff, whether ordained, lay, casual, agency, self-employed, paid or voluntary, irrespective of whether a referral has been made to statutory services. [www.gov.uk/guidance/making-barring-referrals-to-the-dbs](http://www.gov.uk/guidance/making-barring-referrals-to-the-dbs)

If you are concerned about a member of staff, a referral should already have been made to the statutory services, who will discuss referral to the DBS. Synod Safeguarding Officers must always be consulted before a referral is made to the DBS.

The DBS and Disclosure Scotland have processes for dealing with referrals and have risk assessment tools which are used to make decisions. A decision not to bar someone from working with children or adults at risk does not necessarily mean that the person poses no risk, as in the case of unsuccessful criminal proceedings. It remains the employer's duty to decide whether a person should continue to work with children or adults at risk. If necessary, a professional risk assessment should be carried out.

## Dealing with unresolved concerns

There may be ongoing concerns or risks in cases which did not proceed to court, or where the verdict was 'not guilty' or where a disciplinary investigation has highlighted problematic behaviours but did not result in dismissal.

A risk assessment completed by the Synod Safeguarding Officer, consulting with statutory services and / or the Designated Safeguarding Lead if needed, should be used in the process of ascertaining whether or not it is safe for a person to continue work which brings them into contact with children or adults at risk (in either a paid or voluntary role). Depending on the outcome of the assessment, the following actions may be necessary:

- Training and supervision
- Drawing up a safeguarding agreement
- Referring the person to the Disclosure and Barring Service / Disclosure Scotland
- Redeploying the person to another post
- Terminating employment.

- Referring the matter to the Charity Commission, depending on the seriousness of the allegation or incident (see section 5.3 below).

## Action in respect of false or unfounded allegations

If an allegation made is shown to be unfounded, malicious or is proven to have been deliberately invented, consideration should be given to referring the matter to Children's / Adult Services in order for a decision to be made as to whether the individual concerned is in need of support.

It is crucial to ensure that the member of staff who has been the subject of a false allegation is also properly supported, while maintaining appropriate confidentiality and protecting their rights. Such incidents can cause extreme stress to the individual concerned, and the employer may need to offer the services of a counsellor. However, the details of the one making allegations are not to be disclosed.



# Notification requirements

## 5.3 Reporting Serious Incidents to charity regulators

The guidance here focuses on England and Wales and the requirements of the Charity Commission. Procedures for reporting Serious Incidents in Scotland, the Channel Islands and the Isle of Man will be broadly similar, with specific details available from each of the regulatory bodies.<sup>30</sup>

The Charity Commission considers safeguarding to be a governance priority for all charities. The responsibility for reporting serious incidents rests with the charity's trustees, even if they delegate this work to others (for example, trustees of a local church might ask the Synod Safeguarding Officer to report on their behalf). Trustees of the building would also need to report to the Charity Commission if an incident happened on premises they hold in trust.<sup>31</sup>

In addition, registered charities with an annual income over £100,000 per year must submit an Annual Return to the Charity Commission each year. The person who submits the Annual Return on behalf of the trustees (whether at local church, synod or denominational level) is required to make a declaration that no Serious Incidents occurred during the previous financial year that should have been reported but were not. It is an offence to provide false or misleading information to the Charity Commission so all Serious Incidents will need to be reported in order to make the declaration required to submit the Annual Return.

30 Isle of Man [www.gov.im/charities](http://www.gov.im/charities); Guernsey: [www.guernseyregistry.com/charities](http://www.guernseyregistry.com/charities); Jersey [www.charitycommissioner.je/for-charities/guidance-and-legislation/](http://www.charitycommissioner.je/for-charities/guidance-and-legislation/); Scotland [www.oscr.org.uk/](http://www.oscr.org.uk/)

31 [www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity#how-to-report](http://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity#how-to-report)

## What is a safeguarding Serious Incident?

A safeguarding Serious Incident is an adverse event, whether actual or alleged, which results in or risks significant harm to the charity's beneficiaries, employees, office holders, volunteers or to others who come into contact with the charity through its work. This includes where there are allegations or incidents of abuse of or risks to beneficiaries or others connected with the charity's activities. What is considered to be 'significant' is a matter for the trustees to determine, as it will depend on the context of the charity, taking into account its operations, staff, finances and reputation.

The following are examples of what should be reported to the Charity Commission as a safeguarding Serious Incident:

- Beneficiaries of your charity (adults or children) have been, or are alleged to have been, abused or mistreated while under the care of the charity, or by someone connected with the charity, for example an Elder, a member of the clergy, employee or volunteer.
- A person who comes into contact with the charity through its work (including a Church Officer, an employee or a volunteer) has been abused or mistreated (alleged or actual) and the abuse or mistreatment is connected with the activities of the charity (for example it occurred during a religious service, a home visit by a minister, Elder or pastoral visitor, or an activity or event run by the church).
- There has been a breach of the URC guidance or other safeguarding procedures or policies at the charity which has put beneficiaries and other persons who come into contact with the charity through its work at significant risk of harm, including failure to report safeguarding concerns to statutory agencies or to carry out relevant vetting checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or adults at risk.
- It is brought to the attention of the CSC or the SSO that an allegation has been made against a minister, Elder, employee or volunteer in relation to a safeguarding matter which is not related to their work or volunteering role in the church, but the nature of the allegation is such that they are assessed as a potential risk by the SSO and action is taken to manage any identified risk that person may pose to the charity's beneficiaries.
- Alleged or actual incidents in the workplace which have resulted in or risk significant harm to trustees, employees, office holders or volunteers and are considered to be 'serious' in the context of the charity. An incident should always be reported 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: allegations of serious sexual abuse of and by a staff member, office holder or volunteer; abuse by a senior member of staff or office holder or if a widespread culture of bullying, abuse or sexual harassment is uncovered.

The Charity Commission has published some examples which may help you decide whether a safeguarding concern is a Serious Incident that must be reported to the Charity Commission.

**[www.bit.ly/decidingwhattoreport](http://www.bit.ly/decidingwhattoreport)**

## When to report Serious Incidents

The Charity Commission expects a Serious Incident to be reported to it 'promptly', ie as soon as is reasonably possible after it happens, or immediately after you become aware of it.



In practice, a report should be made once sufficient information has been gathered for the report to be meaningful. However, there may be occasions where it is appropriate for a brief initial report to be made, with an indication that a follow-up report will be made once additional information has been obtained.

A failure to report a Serious Incident that subsequently comes to light may be considered by the Charity Commission to be mismanagement, or a serious governance failure. This could result in the Charity Commission taking regulatory action, particularly if further abuse has taken place following the initial Serious Incident that was not reported.  
[www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity](http://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity).

The online form to report an incident can be found here: [www.bit.ly/3PMcIBh](http://www.bit.ly/3PMcIBh)

### **Charity Commission response**

When a Serious Incident is reported to it, the Charity Commission considers whether it is appropriate to provide the reporting charity with regulatory advice or guidance. In the most serious cases, the Charity Commission may need to exercise its statutory powers. In addition, the Charity Commission will consider whether it needs to take any steps to protect other charities, for example where the alleged perpetrator is also a trustee or office holder, or volunteers at or works, in another charity. Serious Incident reporting by charity trustees ensures that the Charity Commission can provide assistance at the earliest opportunity, target their resources where the risks are highest, and help to put charities back on a secure footing where necessary.

## **5.4 Notifying insurers**

It is vital that where there may be liability issues, churches should inform their insurance company as soon as any incident arises which may lead to a claim. Advice should be sought about the insurance cover, and any steps that need to be taken (as far as possible) to safeguard it. The claims manager will also need to be kept in touch with developments. The Elders' Meeting needs to review any serious situation, and delegate this task to a trusted member of the church.

Synods should inform their insurance companies of safeguarding incidents on premises owned by the Synod Trust.

## **5.5 Notifying the URC Press Office**

The URC Press Office should be informed by the Synod Safeguarding Officer or the URC Designated Safeguarding Lead of all cases which may attract media attention. A statement from the URC Press Office will be made available to the synod office and the local church involved.

**This can be a complex area and nobody should try to manage it on their own. It needs to be a collaboration between the local church, Synod, wider Church staff, statutory agencies and other organisations.**



# Ongoing actions during and after investigations

## 5.6 Supporting all those affected

During any police investigation or other formal process, those who have made an allegation (and in some cases their families) will need support. A separate person will need to support the alleged perpetrator. People involved in providing support should not be involved with the investigation or disciplinary proceedings, and may be chosen from outside the church or synod to ensure neutrality.

In the case of allegations against a minister, the Synod Moderator or Synod Pastoral Committee will need to manage the impact of the investigation on the local church, for example by appointing an Interim Minister and establishing clear lines of communication. The General Secretary of the URC will manage the impact of the investigation on the wider Church.

## 5.7 Statements of support / character references

Ministers or church members may be asked to attend meetings, provide statements or give evidence in care or criminal proceedings. If this is the case, or if you are asked to give a character reference for someone involved in a case, you should first consult with the Church Safeguarding Coordinator and the Synod Safeguarding Officer.

## 5.8 Recording and retention of records

Where there is an allegation of a safeguarding nature against a member of staff or a volunteer, including where the allegation is unfounded, records should be retained for 75 years from the date of the allegation.

If a minister, member of staff or volunteer about whom an allegation has been made leaves the synod, their file should be passed to the receiving synod. If the individual moves to a different denomination, the receiving denomination should be informed, and a copy of the relevant information from the file passed on to them.

## 5.9 Learning lessons

At the conclusion of a case in which an allegation is substantiated, the church should review the circumstances of the case, with the assistance of the Synod Safeguarding Officer. They should consider any improvements which need to be made to procedures or practices in the future. This may include additional commitment to training, a more robust induction process for new staff,



the use of codes of conduct, improved guidance for supporting particularly vulnerable groups, and greater clarity over how and when different investigative processes should be used.



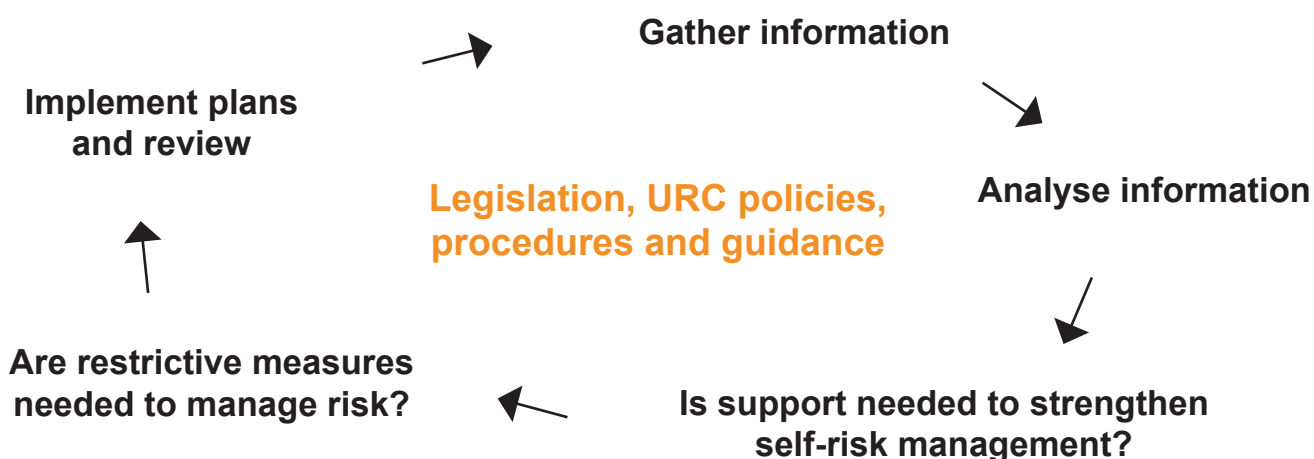
# Involvement in church life of people who may pose a risk to others

This is a challenging area of practice and Synod Safeguarding Officers must always be involved in responding to situations where an individual may pose a risk to others in the church. This section provides an outline of the more detailed guidance given in *Resource G4: Guidance on the involvement in church life of people who may pose a risk to others*.

The guidance here deals with managing risks posed by adults. If a child is thought to pose a risk to others (eg sexual offending against peers or violence towards parents), some differences in process will apply. The SSO / DSL will advise in conjunction with local statutory services.

## 5.10 Risk assessment and risk management

Information about risks can come to light in different ways eg through a DBS / Disclosure Scotland check, from another agency, or an individual might make a self-disclosure or someone else in the church may share information. Whenever you become aware of a risk of this kind, the Synod Safeguarding Officer must be informed and they will take the lead in managing the procedures outlined below. The diagram below summarises a process of collecting information, making plans to manage risk and then reviewing arrangements to update plans if needed.<sup>32</sup>



32 Adapted from Kemshall, Wilkinson and Baker (2013), Working with Risk, Polity Press

## Assessing risk

The purpose of a risk assessment is to provide an evidence base for any risk management plans / actions put in place, ensuring these are proportionate and relevant to the specific risks presented in each individual case.

SSOs will advise on when a risk assessment is needed, how this should be carried out and who else should be involved eg statutory agencies. The amount of detail involved / length of time taken will vary in each situation (eg may need to be quite brief initially when a quick decision is needed or may be more in-depth when dealing with a known serious offender) but the overall process is the same.

### The key stages are:

- Gathering information
- Analysing information
- Specifying who is at risk, in what circumstances and what the likely impact would be.

Further details on the process and a template for recording a risk assessment are provided in *Resource G4: Guidance on the involvement in church life of people who may pose a risk to others*.

## Managing risk

It can be helpful to think about different 'lines of defence' that can help prevent harm.

1. The first line of defence is self-risk management ie the individual taking responsibility for their own attitudes and behaviour. Where this is strong, it can act as a barrier to prevent people from acting in ways which they know are inappropriate. This may not always be enough to prevent harm, however; for example, because an individual is in denial about their behaviour, or because someone is trying to change but finds it difficult to manage their behaviour in particular circumstances.
2. The second line of defence is support / care for individuals, which can include pastoral care within the church and other professional help such as counselling and therapy. This helps to strengthen self-risk management and thus reduce the likelihood of harm occurring. There may still be 'gaps' which allow harmful behaviour to occur, however; for example, because someone refuses to accept support or because the nature of the risks is so serious that additional measures are needed.
3. The third line of defence is therefore restrictive measures such as monitoring and boundary setting in order to prevent access to potential victims and keep a check on behaviours of concern. This can include safeguarding agreements, restricting the activities someone can participate in, and sharing information with other agencies.

In each case, the balance between these three different elements will vary depending on the assessed level of risk and the individual's attitudes, behaviours and commitment to change. Where people are unwilling to acknowledge their problematic behaviour, the focus will need to be on monitoring and boundary setting. For others who demonstrate a genuine desire to change, more emphasis can be given to providing support to help strengthen self-risk management.

## Reviewing risk

The level of risk, and the plans to manage it, will need to be reviewed at regular intervals and if significant new information comes to light. See *Resource G4* for further details.

## 5.11 Providing support to strengthen self-risk management

The church can play an important role in the prevention of harm by helping those who present a risk to others to live an offence-free life. In making plans to manage risks, it is helpful to consider:

1. What does the individual already do well to manage their behaviour?
2. What additional help and support could strengthen their self-risk management?

Elders have responsibility for pastoral care as an integral part of church life. Additional precautions may need to be taken in some situations with people who present a risk (eg pastoral visits to be carried out in pairs). Additional support could also include:

### Support groups

For some known offenders, it will be important to provide them with a group of people who will offer support, friendship and supervision. The membership of this group should be chosen carefully, and the Synod Safeguarding Officer must be consulted about its constitution.

The members should have training, which can be provided or sourced by the Synod Safeguarding Officer or the Church of Scotland Safeguarding Service. A sample role description for members of support groups is provided in *Resource G4*.

### Signposting to professional services

Some people will benefit from access to specialist expertise eg in relation to addictions, sexual behaviour. See 'Useful Links' for suggestions of additional resources and organisations.

## 5.12 Monitoring and setting boundaries

If self-risk management and support are not sufficient then various restrictive measures may be needed. These should be proportionate and based on the risk assessment.

### Safeguarding agreements

A safeguarding agreement between the local church, the person who is considered to pose a risk, and any statutory agencies involved can be used to set boundaries and reduce risks. This is a highly confidential process which will be led by the Synod Safeguarding Officer.

#### When are safeguarding agreements needed?

A safeguarding agreement must be in place when:

- An offender is under statutory supervision by the police or Probation Services. This includes registered sex offenders, those on licence following release from custody, those on community sentences requiring probation supervision, and other offenders identified under Multi-Agency Public Protection Arrangements (MAPPA, for further details see *Resource G4*).

A safeguarding agreement should always be considered when:

- Someone has an unspent conviction or caution for any offence against a person
- There is a current police investigation in relation to any offence against a person

- There are court proceedings pending in relation to any offence against a person
- Someone is barred from working with children or adults at risk.

If an agreement is not considered necessary in such situations, the reasons for this should be recorded in writing by the SSO.

A safeguarding agreement may need to be put in place in other circumstances such as:

- Information received from the police or other statutory services about past behaviour of concern which has not resulted in a conviction or caution
- Previous convictions or cautions from a long time ago
- Situations where an individual is unable to manage unhelpful behaviours without suitable boundaries being in place via an agreement
- When there are injunctions in place (eg non-molestation order).

*Resource G4* provides further details on:

- Who is involved in an agreement
- What should be included
- Who else in the church needs to be told about an agreement
- Monitoring agreements
- The process for review / revision / cancellation of an agreement
- What happens when the subject of an agreement leaves a church.

## Multi-agency collaboration

There will be a variety of people subject to safeguarding agreements including those who are:

- Convicted and managed by statutory agencies
- Convicted but not currently managed by statutory agencies
- Not convicted and not managed by statutory agencies.

The types and intensity of contact with other agencies will depend on the nature and severity of past offences and current risks. Examples of involvement with other agencies include:

- Probation supervision
- The Sex Offenders' Register
- Use of electronic monitoring / tagging
- Multi-Agency Public Protection Arrangements (MAPPA)
- Liaison with other agencies eg mental health services, housing providers.

Further details on these are provided in *Resource G4*.

## Disclosures to third parties

Synod Safeguarding Officers must be consulted before confidential information is shared.

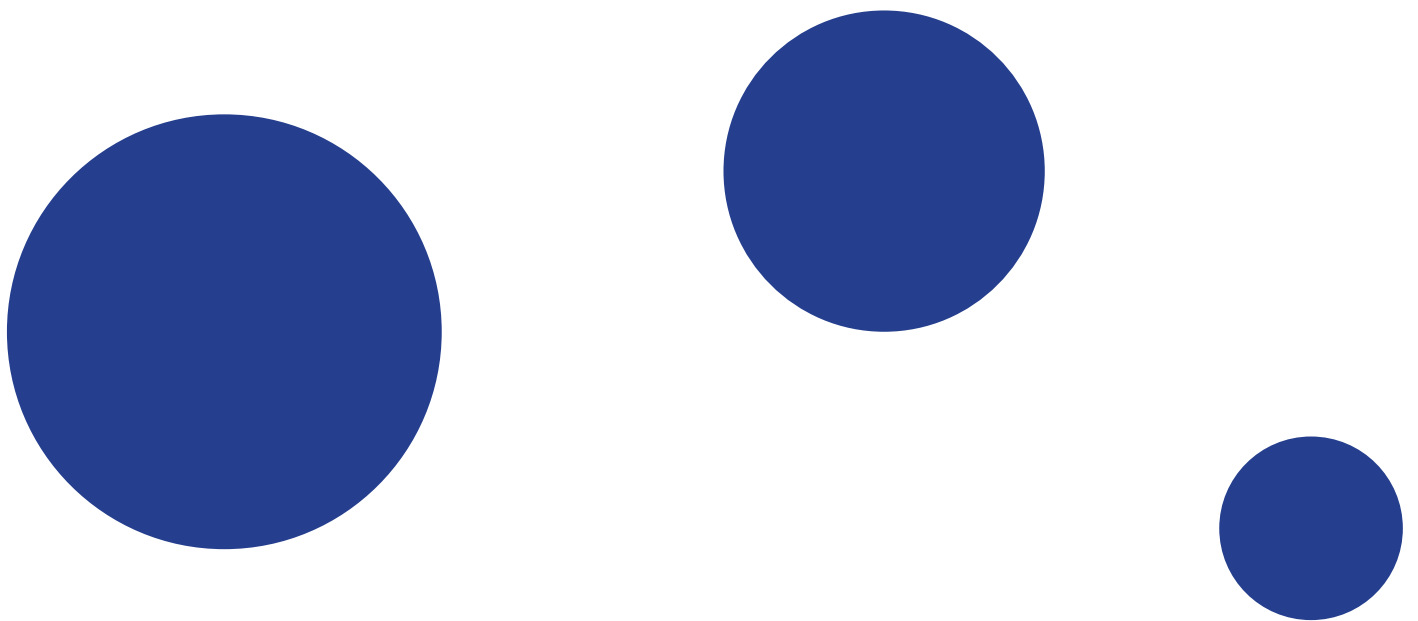
A disclosure should only be made if there is a pressing need. A disclosure can have significant consequences, so there must be real and cogent evidence of a pressing need for disclosure.

Each case must be considered on its own merits. Considerations involved in deciding whether there is a pressing need to share information about an offender / suspected offender include:

- the balance between the public interest and the need to protect people, and the right of an individual to a private life
- the person's previous history and current risk assessment, if available
- the level of likely access to children or those they pose a risk to
- the degree of risk posed by the person if a disclosure is not made
- any other factor in the individual case which is thought to be relevant.

Where possible, these matters should be considered on a multi-agency basis. Legal advice should be sought where there is doubt about the lawfulness of a disclosure. In view of the possibility of a legal challenge / complaint by an offender, potential / suspected offender or future victim, all agencies must, in addition to seeking any legal advice required, maintain a written audit trail of events, actions, discussions and decisions as well as the reasons for them.





# Chapter six

## Supporting victims and survivors



We want to be thoughtful in our use of language, but this is not always straightforward as, for example, there are different views about the terms ‘victims’ and ‘survivors’. Some people may use them interchangeably while others attach specific meanings to them. Sometimes, ‘victim’ may be used where there is a legal case and / or when the occurrence of abuse is recent. ‘Survivor’ may be used to focus more on life after the abuse and the process of healing and recovery. Some people may use terms such as ‘overcomer’, while other people who have experienced abuse may not identify with any of these terms. This chapter generally uses ‘people who have experienced abuse’, while recognising that individuals will choose to describe themselves in different ways and it is important to respect that.

The key principle underpinning good practice in this area is that all those who have experienced abuse, whether recently or in the past ‘will be listened to and offered the pastoral care and support they deem appropriate and relevant, irrespective of type of abuse, context, or when this occurred’ (General Assembly policy statement 2021).

### **Key practice points:**

- Each person’s experience of, and reactions to, abuse will be different, so responses need to be adapted to each individual’s needs
- Abuse has a long-term impact and people may need support over extended periods of time
- Those who have been abused have experienced a loss of control, and support should be aimed at helping them find their own preferred means of help
- Support is generally best provided at local level by those who are willing to listen to, and walk alongside, people who have experienced abuse
- Nobody should feel pressured into quickly offering forgiveness; there needs to be recognition that this can be a long and difficult process, and may never happen for some people.

### **Key responsibilities:**

#### Local Church:

- The Elders’ Meeting has responsibility for provision of pastoral care
- Be aware of local support services that people can be referred or directed to
- Ensure those in relevant roles attend appropriate training
- Seek advice from the Synod Safeguarding Officer about provision of appropriate support when necessary.

#### Synod:

- Advise local churches on the provision of support for those who have experienced abuse
- Provide relevant training
- Share information with Synod Pastoral Committees.

#### DSL / Denomination:

- Manage and develop the URC’s practice with regard to ensuring the voices of those who have experienced abuse are heard within the church
- Incorporate the perspectives of those who have experienced abuse into the ongoing development of policy and training.

## 6.1 Building a supportive culture

While the guidance in this section is focused more on local congregations, it is important to remember that the Church, at all levels, needs to be sensitive to the suffering, pain and subsequent issues facing those who have experienced abuse. One part of this is to raise awareness of abuse and help build a culture where people can feel safe in disclosing difficult experiences.

### Awareness

It is important to be aware that, at all times, there may be those in a congregation who are facing issues relating to current or past abuse. It is likely that there will be people within the church who may never have disclosed or come to terms with what they have experienced. This can relate to any kind of abuse in any setting. For example, those who have experienced abuse in the past may be re-traumatised by learning of another case of abuse in the church as painful memories resurface.

### Sensitivity in worship

There are a number of things within the regular pattern of worship that might present problems to those who have experienced abuse. For example:

- While most visitors appreciate a warm welcome, some who have been abused may find certain physical aspects of welcome uncomfortable
- Some people like to be invited to sit beside other members of the congregation, while others prefer a more solitary place
- Different words, actions, smells will set off memories for different individuals
- Special services such as Mothering Sunday or Father's Day can be difficult for some people.

*(Source: Responding Well to Survivors of Sexual Abuse, 2021, Church of England).*

It is not possible to prevent all triggers from occurring, but helpful approaches can include:

- Be prepared – and not surprised – that someone may react negatively to an aspect of church life or worship that most people see as normal
- Be willing to make changes and find ways to help people feel more comfortable within church
- Consider options for providing details of service content in advance, eg within notice sheets or orders of service or on the website, as this may be helpful preparation for those who might otherwise struggle with something within the worship
- Display a safeguarding poster so those who may need support in church know who to contact and know that safeguarding is taken seriously
- Have appropriate identifiable people available after worship to listen to those who want someone to talk to eg a minister or duty Elder.

### Signposting sources of support

Another element of creating a supportive culture is to publicise contact details for support organisations that people may wish to contact independently. Sometimes people may wish to contact a helpline or service without necessarily telling anyone in church.

- Have brochures and posters in visible and easily accessible places
- Provide contact details for local services and national helplines
- Some of this information could be placed in a private location, such as toilets, where people can process the information without fear of discovery.

## 6.2 Caring for individuals who have experienced abuse

The guidance here relates to provision of support and care for those who have experienced abuse. Procedures for responding to concerns or disclosures are covered in chapter four.

Some general principles are covered here and more information on specific topics (eg domestic abuse, modern slavery) can be found in the online Resources page.

### Pastoral care for individual needs

Pastoral care is one of the responsibilities of the Elders' Meeting, which is exercised jointly by the Minister(s) and Elders of the church. Ministers and Elders need to relate with compassion, kindness and within appropriate boundaries, taking slow steps to avoid raising expectations or causing additional damage by being unable to deliver what might be promised as a church.

Individuals may be seeking different outcomes when they disclose abuse or ask for help:

- For some, just being able to talk to a trusted person about their experiences can be a powerful, healing event
- Some may be seeking pastoral support from the Church
- Some may need advice about how best to seek professional help. This may involve support to access local specialist services. Children or young people who have experienced abuse will require specialist support. If you need advice about how best to support someone who has experienced abuse, please contact the Synod Safeguarding Officer.

As a church, we need to be aware of cases that don't 'fit' some definitions and to be flexible in the way we offer support over time. It is important to cater for people's different needs, recognising that not everyone copes in the same way. Each experience is unique and personal, depending on the age at which the abuse happened, the relationship to the abuser, the frequency, severity and duration of abuse, and the response to their first disclosure.

**'Relational and survivor-centred approaches mean prioritising the needs of victims or survivors. The responses recognise the trauma experienced by victims or survivors, and their potential to heal and recover with appropriate support. Conversely, an inappropriate response can compound the harm and distress that victims and survivors feel.'**

(From *Responding Well to Survivors of Sexual Abuse*, 2021, Church of England)

### Listening and building trust

Each church needs to have people ready to listen. Evidence suggests that those who have experienced abuse do not need great experts to listen to them; just another human being who listens at their pace, does not push them too hard and recognises that abuse is not their whole story. They want people who can trust them to be the expert in their own life and offer them the chance to say no to help or withdraw their involvement if it is difficult for them and their needs change over time. Listeners also need to be aware of their own limits, however, and be able to signpost to other sources of support rather than trying to deal with everything themselves.

It is essential for those who have experienced abuse to know that they can trust those who are supporting them and it may take time to build up this trust. Many people will not readily disclose their experiences. Those who are affected by modern slavery or who have experienced difficult outcomes from statutory agency engagement may fear and mistrust their involvement. They may fear their involvement due to past experience in the UK or originating countries. They can lose

contact with family, friends and community through feelings of shame, manipulation or fear of reprisals, and social isolation can be an additional source of vulnerability. The absence of support may result in people returning to damaging situations, so taking time to build trust can be vital in preventing further harm.

Listeners should be alert to the fact that the person telling their story may disclose for the first time part of their abuse. Such new disclosure should be treated in accordance with the guidance in section 4.4 above, while also recognising the importance of empowerment (see next section below) and not taking control away from them.

For training and resources on developing listening skills, see the online Resources page.

## **Empowerment**

People who have been abused have experienced a loss of control, and it is important not to compound that by eg taking decisions on their behalf, ignoring their views or imposing particular kinds of 'help'.

Interventions that take power away from someone who has experienced abuse will not help to foster their recovery no matter how much it may appear to be in their immediate best interest.

*(Source: Trauma and Recovery by Judith Herman).*

The principle of empowerment that underpins adult safeguarding work is therefore paramount ie people being supported and encouraged to make their own decisions. This can include:

- Providing information about relevant support services so that someone who has experienced abuse can choose what they feel comfortable with / find most helpful
- Accepting that someone may decline help or withdraw from support services at any time
- Helping someone work out options they can use to overcome barriers that may make it difficult for them to access support.

## **Provision of support in cases where no action is taken by relevant authorities**

If someone within the congregation has alleged abuse and the authorities have decided not to investigate further, it is important to continue to offer appropriate pastoral support to the individual and / or signpost them to specialist services with their consent.

## **Provision of support in cases where there is an ongoing / current case against the church**

Every situation will be different but some people may not want to discuss their needs with a church worker or accept support from a church body that they associate with a traumatising experience. Provision by other groups or organisations may be appropriate in such circumstances. In cases where a victim or survivor wishes to continue worshipping within the church, consideration may need to be given about how to limit contact with the alleged perpetrator and / or their family members.

Synods normally have a pastoral adviser / consultant who can offer support or advise on other appropriate means of help.

## Financial provision for professional help in cases of abuse committed by church workers

Decisions about funding for provision of counselling, therapy or other professional support can be made on an individual case-by-case basis, following advice from the Synod Safeguarding Officer.

The URC legal advisors may also need to be consulted eg about issues relating to insurance or liability.

### Formal apologies

In some circumstances it will be appropriate for local church / synod / URC trustees to apologise to a victim or survivor eg where a church worker has been convicted of abuse against them, or there is evidence that previous allegations were not properly investigated. The Designated Safeguarding Lead must be involved and will seek legal advice on when and how this should be done.

## 6.3 Forgiveness

Forgiveness and healing are crucial concepts in Christian life, work and teaching, but they are not quick fixes. They are long and difficult processes which people should have the choice to work through if and when it is right for them. There should not be any pressure or expectation from the church on someone who has experienced abuse to quickly forgive, but rather a recognition that this will be a long and difficult journey and for some people may never happen.

For further discussion of this issue, see '*Forgiveness and Reconciliation in the Aftermath of Abuse*' from the Church of England Faith and Order Commission.

[www.bit.ly/forgivenessandreconciliation](http://www.bit.ly/forgivenessandreconciliation)

## 6.4 Summary: general principles for responding well and helping recovery

Recovery after any form of abuse is complex and will vary among individuals. The following aspects may be important for those who have experienced abuse (but not all will apply in every case):

- the opportunity to tell the story (to name the sin and share the experience)
- for someone to hear their story (that is, to believe and acknowledge the harm done and the fact that they are not to blame)
- receiving a compassionate response (that is, to 'walk with' the person rather than try to 'problem-solve' immediately)
- an effort to protect people from further harm (both the individual and any others who may be at risk)
- the community holding the perpetrator to account
- an act of restitution in so far as this is possible
- being made aware of support groups so they have the choice to engage with others who have had similar experiences if they feel this is helpful.

(Source: *The Faith Trust Institute*).



# Resources

These provide a range of supplementary materials including:

- Additional information and guidance on specific topics
- Codes of conduct
- Forms (not to be amended)
- Templates and model documents which can be adapted for local contexts
- Links to external resources and other organisations.

## Supplementary information

S1: The role of a Church Safeguarding Coordinator

S2: URC training matrix

S3: Roles which require a DBS / Disclosure Scotland check within URC

S4: Signs of possible dementia/memory loss

S5: Signs and symptoms of abuse

## Codes of Conduct

C1: Code of conduct for working with children (under 18s)

C2: Code of conduct for working with adults (over 18s)

## Forms

F1: Safeguarding concern form

F2: Self-declaration form

F3: Church Safeguarding Coordinator Declaration Form (CSC7)

F4: Annual church safeguarding returns form

## Templates and model documents

These are sample / model documents that can be adapted to fit local circumstances.

## Policies and procedures

P1: Template for local church safeguarding policy

P2: Template safeguarding policy statements for local churches

P3: Model church online safety policy

P4: Template for church policy statement on the recruitment of ex-offenders

P5: Local church safeguarding checklist

## Display materials

D1: Model church safeguarding poster

D2: Suggested safeguarding wording for websites

D3: Feel Safe poster

D4: Safeguarding summary for children



## **Safer recruitment**

SR1: Volunteer application form

SR2: Volunteer reference request form

SR3: Sample questions on safeguarding for interviews and discussions

SR4: Role descriptions

## **Safer activities**

SA1: Risk assessment template (with guidance)

SA2: Information and consent form

SA3: Request to administer medication form

SA4: Sample volunteer driver agreement

SA5: Template for a support plan

## **Guidance leaflets**

G1: Guidance on safeguarding for Local Ecumenical Partnerships

G2: A guide to adult safeguarding

G3: A guide to domestic abuse

G4: Guidance on the involvement in church life of people who may pose a risk to others

G5: Guidance on responding to allegations of bullying and harassment

G6: Guidance for staff facing safeguarding allegations

## **Useful links and external resources**

L1: Contact details for relevant organisations

Additional material may be added to this list of Resources as new topics arise or additional guidance is requested. This will all be available online at [www.urc.org.uk/safeguarding/](http://www.urc.org.uk/safeguarding/)





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## Good Practice 6th Edition

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All web link suggestions were correct at the time of going to print, and the United Reformed Church is not responsible for any external web content.

This material is produced in both printed and online formats for the use of United Reformed Church Ministers, officers, workers and volunteers.

It is supported by a number of online resources and an index.

We have to treat one another carefully, and church should be a place of respect, support and proper sensitivity.

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*The*  
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