



# **Diocesan Safeguarding Policy and Guidance for Parishes**

**May 2014**

## Contents

	<b>Page</b>
<b>1 Introduction by the Bishop of Exeter and Theological Statement</b>	<b>3</b>
<b>2 Diocesan Safeguarding Policy Statement</b>	<b>4</b>
<b>3 Diocesan Safeguarding Commitment</b>	<b>5</b>
<b>4 What to do if you're worried a child/adult is at risk of being abused</b>	<b>6</b>
<b>4.1 Flowchart for Responding to Concerns about a Child or Adults at Risk</b>	<b>7</b>
<b>5 Safeguarding Children &amp; Young People</b>	<b>8</b>
5.1 What is Safeguarding?	<b>8</b>
5.2 What do we mean by 'Children and Young People'?	<b>8</b>
5.3 The Right of Children to be Protected	<b>9</b>
5.4 What do we mean by 'Harm'?	<b>9</b>
5.4.1 <i>Who might harm children and young people?</i>	<b>9</b>
5.4.2 <i>How might children and young people be harmed?</i>	<b>9</b>
5.4.3 <i>Where might children and young people be harmed?</i>	<b>10</b>
<b>6 Definitions of Abuse (Children &amp; Young People)</b>	<b>11</b>
6.1 Physical Abuse	<b>11</b>
6.2 Emotional Abuse	<b>11</b>
6.3 Neglect	<b>11</b>
6.4 Sexual Abuse	<b>11</b>
6.5 Organised/Institutional Abuse	<b>12</b>
6.6 Spiritual Abuse	<b>12</b>
6.7 Child Abuse Linked to Faith or Belief	<b>12</b>
<b>7 Signs &amp; Symptoms of Abuse (Children &amp; Young People)</b>	<b>13</b>
<b>8 Why Don't Children and Young People Tell?</b>	<b>15</b>
<b>9 Safeguarding Adults</b>	<b>16</b>
9.1 What is Safeguarding?	<b>16</b>
9.2 What is 'Vulnerability'?	<b>16</b>
9.3 What do we mean by 'mistreatment' and 'harm'?	<b>17</b>
9.3.1 <i>Who might harm vulnerable adults?</i>	<b>17</b>
9.3.2 <i>How might harm to vulnerable adults happen?</i>	<b>17</b>
9.3.3 <i>Where might harm to vulnerable adults happen?</i>	<b>18</b>
9.3.4 <i>The prevalence of abuse of adults</i>	<b>18</b>
<b>10 Definitions of Abuse (Adults)</b>	<b>20</b>
10.1 Physical Abuse	<b>20</b>
10.2 Sexual Abuse	<b>20</b>
10.3 Psychological/Emotional Abuse	<b>20</b>
10.4 Financial/Material Abuse	<b>20</b>
10.5 Neglect	<b>20</b>

10.6	Discriminatory Abuse	20
10.7	Organised/Institutional Abuse	20
10.8	Spiritual Abuse	20
<b>11</b>	<b>Signs &amp; Symptoms of Abuse (Adults)</b>	<b>21</b>
<b>12</b>	<b>Good Practice Principles for Safeguarding Work with Adults</b>	<b>22</b>
12.1	Creating Safer Environments	22
12.2	When might intervention be necessary?	22
<b>13</b>	<b>Managing Offenders in the Church Context</b>	<b>24</b>
13.1	Convicted Offenders against Children	24
13.2	Ministering to people who are known to have sexually abused children	25
13.3	The Agreement	26
13.4	Disclosures by perpetrators of past abuse	27
<b>14</b>	<b>Supporting Survivors of Abuse</b>	<b>28</b>
14.1	Diocesan Responsibilities	28
14.2	Parish Responsibilities	29
<b>15</b>	<b>Parish Safeguarding Responsibilities (General Checklist)</b>	<b>30</b>
<b>Appendices</b>		
<b>A</b>	<b>Diocesan Safeguarding Management Policy</b>	<b>32</b>
<b>B</b>	<b>Guidance on writing a Parish Safeguarding Policy</b>	<b>34</b>
<b>C</b>	<b>Model Parish Recruitment of Ex-Offenders Policy</b>	<b>36</b>
<b>D</b>	<b>Model Parish Policy Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information</b>	<b>38</b>

## Introduction by the Bishop of Exeter and Theological Statement

In Matthew's Gospel Jesus tells his followers, 'You are the light of the world. A city set on a hill top cannot be hidden' (Matthew 5. 14). Christians are to be a transformative presence in society bringing light and hope to others. In particular we are called to be a beacon of good practice in the care and protection of children and vulnerable adults. As Jesus says uncompromisingly, 'If any of you put a stumbling block before one of these little ones who believe in me, it would be better for you if a great millstone were fastened around your neck and you were drowned in the depth of the sea' (Matthew 18.6).

Today safeguarding is at the forefront of public consciousness. In recent years we have become acutely aware of the way in which historic incidents of abuse were sometimes hidden or even tolerated. There must be zero tolerance to such behaviour and the church needs to be at the vanguard, fostering a change of culture across society. We have to put our own house in order and embody best practice in our parishes, schools and chaplaincies. As an organisation, it is vital that we keep people safe and support survivors of abuse, apologising for the wrongs of the past.

The church is a place where all sorts of people, including perpetrators of abuse, seek acceptance, redemption and forgiveness. Some perpetrators will be genuine in their repentance, but others may not be. This is why forgiveness and vigilance need to go hand-in-hand. Compassion and naiveté are not the same thing.

This document sets out best practice for all who are working with the young and the vulnerable in our churches. Drawing upon the experience of professionals, it sets out principles to prevent abuse, as well as the protocols that must be followed should a problem arise. By operating within the legislative requirements and following this guidance we can ensure that everyone is given the safety and the security which is their right. It also lists information, resources and contact details if further help is needed.

We are determined that those who work with children and vulnerable adults, many of whom are volunteers, receive proper training and are appropriately supported. As one of the largest providers of voluntary children's and youth work in Devon, we are committed to ensuring that, with God's help, our churches, schools and chaplaincies are safe places where everyone is valued.

+ Robert Exon

The Rt Revd Robert Atwell  
*Bishop of Exeter*

## Diocesan Safeguarding Policy Statement

The safeguarding of children, young people and adults at risk is an important part of all Church activities. Our Safeguarding Policy demonstrates and guides all within the Diocese of Exeter on the part that they play in safeguarding across the whole Church community. The Diocese of Exeter [*i.e. the Diocesan Bishop, the Diocesan Synod and the Diocesan Board of Finance, whose clergy and lay membership is drawn from parishes and deaneries throughout Devon*] is therefore whole-heartedly committed to the wellbeing and protection of all those who are vulnerable or at risk of abuse.

The Diocese of Exeter commends this commitment and its safeguarding policy to parishes and, mindful of their legal responsibilities, encourages them in the strongest possible terms to adopt and proactively implement an appropriate parochial safeguarding policy as informed by national and diocesan guidance.

The Diocese of Exeter adopts and endorses the principal safeguarding policies of the Church of England: 'Protecting All God's Children' (4<sup>th</sup> edn, 2010) and 'Promoting a Safe Church' (2006). Synod is also committed to the implementation of the policies and guidance contained in 'Responding well to those who have been sexually abused' (2011) and 'Responding to Domestic Abuse; guidelines for those with pastoral responsibility' (2006). It is further committed to safer recruitment for posts relating to children and other vulnerable people as set out in the joint Church of England and Methodist 'Safer Recruitment Policy' (2013).

The Diocese of Exeter will also monitor national developments, whether through updated policy and guidance or through reports from elsewhere in the country (such as the Commissaries Report into Safeguarding in the Diocese of Chichester) and undertakes to follow relevant emerging requirements and recommendations in a timely and fulsome manner.

(Policy Statement adopted by Diocesan Synod on 17 May 2014)

## Diocesan Safeguarding Commitment

The Diocese of Exeter is committed to safeguarding vulnerable people throughout the diocese and whole-heartedly endorses the commitment to safeguarding as described in the 'Joint Statement of Safeguarding Principles for the Church of England and Methodist Church of Britain'<sup>1</sup> We are therefore committed to:

- the care, nurture of, and respectful pastoral ministry for all: children, young people and adults.
- the safeguarding and protection of children, young people and all adults.
- the establishing of safe, caring communities which provide a loving environment where victims of abuse can report or disclose abuse and where they can find support and best practice that contributes to the prevention of abuse.

To this end . . .

- We will carefully select, support and train all those with any responsibility within the Church, in line with Safer Recruitment principles, including the use of criminal records disclosures and registration/membership of the relevant vetting and barring schemes.
- We will respond without delay to every complaint made, that any adult, child or young person may have been harmed, cooperating with the police and local authority in any investigation.
- We will seek to offer informed pastoral care and support to anyone who has suffered abuse, developing with them an appropriate ministry that recognizes the importance of understanding the needs of those who have been abused, including their feelings of alienation and/or isolation.
- In as far as we are able, we will seek to protect survivors of sexual abuse from the possibility of further harm and abuse.
- We will challenge any abuse of power, especially by anyone in a position of trust.
- We will seek to offer pastoral care and support, including supervision, and referral to the appropriate authorities, to any member of our church community known to have offended against a child, young person or vulnerable adult.
- We will follow legislation, guidance and recognised good practice.

It is the responsibility of everyone to uphold these principles. However, the Diocesan Safeguarding Team, alongside each Bishop's office, the Chair of the Diocesan Safeguarding Management Group, and the remaining Senior Staff, will share the overall management of safeguarding across the Diocese, drawing in specialist support as needed to achieve the above.

---

<sup>1</sup> Issued within the Safer Recruitment Policy for the Church of England and Methodist Church of Britain, 2013. This statement has been adapted from the previous statement of principles issued within the 'House of Bishops Policy for Safeguarding Children' in 2010 to encompass adults at risk of abuse.

## What to do if you're worried a child/adult is at risk of being abused

Safeguarding children and adults at risk of abuse is everyone's responsibility. The Church has an important role to play in society as we possibly have more contact with children and their families than any other single body, organisation or agency. With this comes an opportunity to be alert, vigilant and prepared to both prevent harmful situations occurring and responding well in those cases where we suspect abuse has already occurred.

It is important that any individual who suspects or is worried that a child or vulnerable adult is being abused or may be at risk of abuse, is able to make that concern known in a clear and concise manner without delay. The diocese therefore provides the following guidance (supported also by the following flowchart):

- In the first instance, where safeguarding concerns relate to a member of the laity, contact should be made within 24 hours with the relevant Parish Safeguarding Representative.
- A written record must be made, signed and dated detailing the concern, allegation or disclosure. This must be passed to the Parish Safeguarding Representative and/or Diocesan Safeguarding Advisor (or Assistant) to assist in the decision-making process.
- The Parish Safeguarding Representative will consult with the Parish Priest/Vicar and the Diocesan Safeguarding Advisor to determine what action may need to be taken.
- It should be noted that if making contact with any of the above becomes problematic and risks delay causing the potential for greater or further harm, the concern should be escalated to the next step to achieve a timely response to safeguarding matters.
- If the safeguarding concern relates to a member of the clergy (or other person in a position of trust and responsibility), contact should be made within 24 hours directly with the Diocesan Safeguarding Advisor (or Assistant). A written record must be made in the same manner. The Diocesan Safeguarding Advisor will then consult with necessary parties to facilitate a prompt and effective response.

Where a report is made in relation to another person with responsibility within the local church, this is a potential form of 'whistleblowing'. For further advice please speak to the Diocesan Safeguarding Advisor or the Diocesan Director of Human Resources on 01392 294943.

The Department's contact details are as follows:

**Diocesan Safeguarding Advisor:**

Simon Tickner

Tel: 01392 345909

Email: [safeguarding@exeter.anglican.org](mailto:safeguarding@exeter.anglican.org)

**Assistant Diocesan Safeguarding Advisor:**

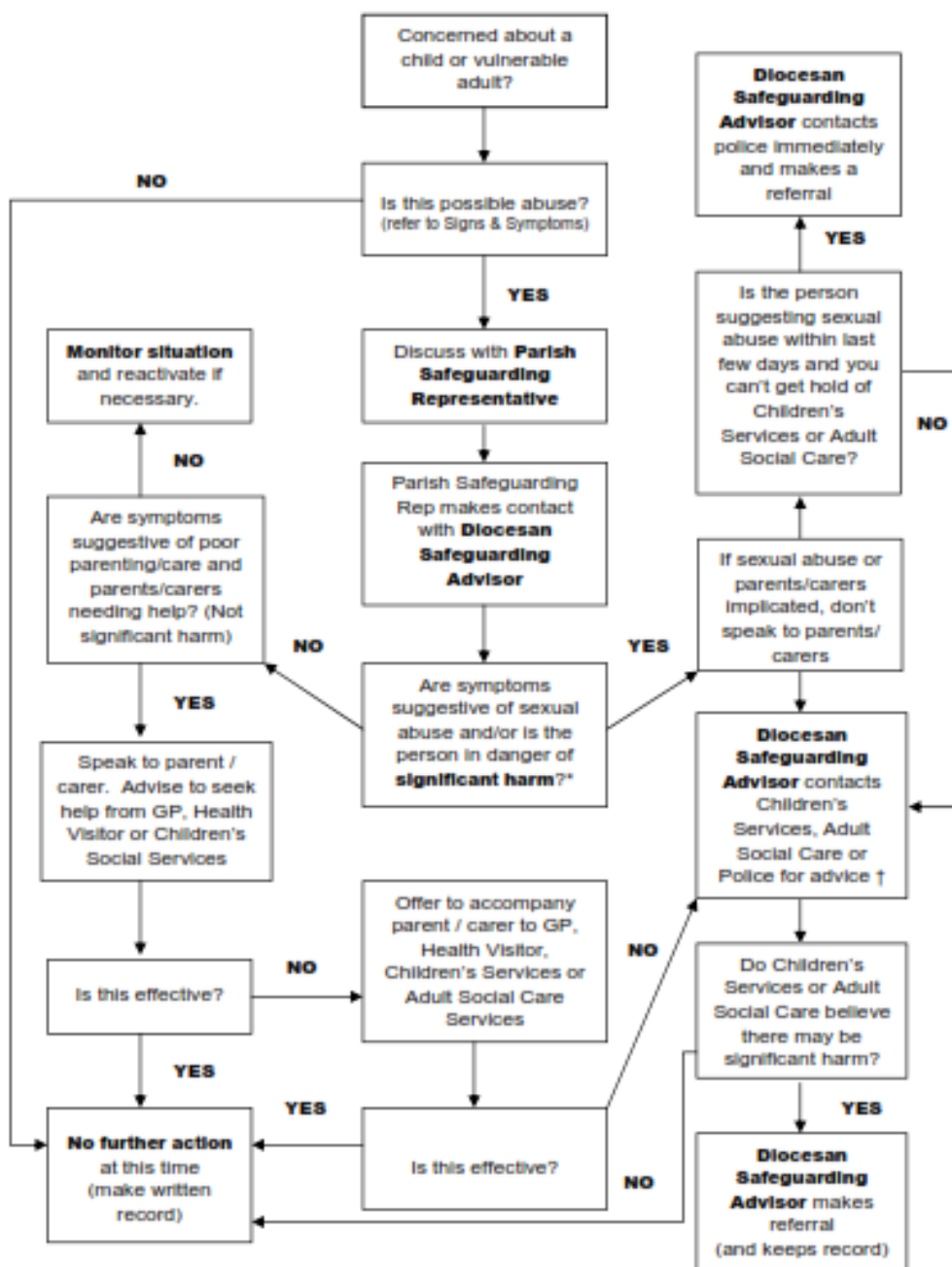
Sarah Miller

Tel: 01392 245910

Email: [safeguarding@exeter.anglican.org](mailto:safeguarding@exeter.anglican.org)

Email addresses should not be used as the initial point of contact for any safeguarding concerns where there is the need for swift advice, unless there is no other means of making contact with the Diocesan Safeguarding Team. In the case of an emergency, contact should always be made with the Police by dialing **999**.

## FLOWCHART FOR RESPONDING TO CONCERNS ABOUT A CHILD OR ADULT AT RISK



\* Refer to safeguarding policy for guidance on 'significant harm'

† Where concerns are about an adult, due attention must be given to any wishes expressed about reporting following an assessment of their ability to make informed decisions and give informed consent.



## Safeguarding Children & Young People

The safeguarding of children and young people is an integral part of the life and ministry of the Church. This safeguarding children and young people policy sits together with the safeguarding adults' policy. This policy represents therefore the Diocese of Exeter's commitment to safeguarding children and young people and reflects our policy statement and commitment. The Diocese believes that the welfare of the child is paramount and that all children should be protected from harm or abuse. To do so we will work in partnership with children, parents, carers and other agencies to promote and safeguard the welfare of our children.

### What is safeguarding?

Safeguarding children is the action we take to promote the welfare of children and protect them from harm – it is everyone's responsibility. More than simply responding well to abuse where it is suspected or alleged; safeguarding also requires a wider set of measures, actions and systems that promote a safer culture and environment for children and young people such that abuse can be prevented from occurring.

Everyone who comes into contact with children and families has a role to play. The Church is in a unique position in that it probably has more contact with children and young people within the context of their families than any other single organisation or agency in any given community. This presents great opportunity as well as great responsibility. 'Working Together to Safeguard Children' 2013<sup>2</sup>, states:

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

### What do we mean by 'Children and Young People'?

In this document, as in the Children Acts 1989 and 2004, a child is anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people', and these terms are often used interchangeably. The term 'young people' is often used to describe children who are of secondary school age, i.e. aged between 11 and 17. By implication, the term 'children' is often used to specifically describe a child between the age of 0 and 10. The term 'parent' includes all those who have parental responsibility for the child. There may be other adults who have contact or care of children about whom you have concerns in relation to their contact with or care of a child. In these circumstances, most of this guidance will still apply, but you should always seek advice from your Parish Safeguarding Representative or Diocesan Safeguarding Team.

---

<sup>2</sup> 'Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of Children', Department for Education, 2013

## **The Right of Children to be Protected**

For too long children have died or been abused at the hands of those who should have protected them. Therefore the work of safeguarding children and young people is now guided by a significant body of legislation and policy. They serve to reinforce the importance of this work and the basis from which we should be operating. The UN Convention on the Rights of the Child (1989) challenges us to take measures to protect children from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse. Within England this is reflected in the Children Act 1989 which provides the statutory powers for the Local Authority to investigate and intervene where there are concerns for significant harm to a child. More specifically, statutory and voluntary organisations are guided by Working Together to Safeguard Children (2013), which provides specific guidance for faith organisations. This policy has been developed against this legislation.

### **What do we mean by ‘Harm’?**

The primary concept in safeguarding is recognising and responding to the potential *significant harm* of children. Significant harm is any single or multiple maltreatment or impairment to the health and development of a child and is determined by careful assessment.

### **Who might harm children and young people?**

Children may be abused in a family or in an institutional or community setting, by those known to them, or, more rarely, by a stranger. They may be abused by an adult or adults, or by another child or children, including bullying and abuse through the use of digital technology. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Most child abuse is perpetrated by an adult, male or female, who is known to the child; most often a family member or close friend. Such trusted adults may be in the child’s community; they may be trusted professionals, leaders or members of a child’s church.

### **How might children and young people be harmed?**

Children can be harmed in many ways. Maltreatment of a child occurs where their health or physical, emotional, intellectual, sexual, spiritual or social development is damaged or diminished by other people. All abuse is a betrayal of trust and a misuse of relationships and power. Church communities must be particularly vigilant to identify the inappropriate use of any religious belief or practice which may harm somebody spiritually, emotionally or physically. Abuse can be both an act of commission (doing things we know we should not do), such as physical or sexual abuse or omission (things we know we should do, but fail to do), such as neglect.

Child abuse affects girls and boys, babies and young people of all ages up to 18. Children with learning difficulties or disabilities and/or physical disabilities are particularly vulnerable. Children from all kinds of family and social background can be abused. It occurs in all cultures and religions.

Digital technology such as the internet and mobile phones are being increasingly used as a medium for abuse. Amongst their peers children may experience ‘sexting’, ‘cyber-bullying’ or be enticed to have taken or send explicit photographs of themselves. With adults it may also take the form of

the production and distribution of photos or video displaying abusive images of children. Children can also be entrapped and blackmailed by these practices.

### **Where might children and young people be harmed?**

It is important to remember that children might be at risk of abuse in a wide variety of settings, including the family home, the homes of friends or the places in which they learn or are cared for. For this reason it is important to ensure that all reasonable steps are taken to create safer cultures, environments and working practices to assist in the prevention of abuse.

Recent studies suggest that there may even be greater risk of harm posed to children who are part of institutional settings, including the Church. The reasons given for this are; the potential for abuse to occur and be over-looked, institutions putting their own needs above those of children, the development of unsafe cultures and leadership practices, the high social regard for the work of the institution creating false security amongst the public, loyalty of workers to the mission over that towards children (CEOP)<sup>3</sup>.

---

<sup>3</sup> 'The Foundations of Abuse: A thematic assessment of the risk of child sexual abuse by adults in institutions', CEOP/NCA, 2013

## Definitions of Abuse (Children and Young People)

The following definitions of child abuse are taken from 'Working Together to Safeguard Children' (2013) and represent the recognised categories of abuse that will be used across all organisations and agencies involved in working with children and young people:

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

**Emotional Abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as the overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-givers, or the failure to ensure access to appropriate medical care or treatment. It may also include the neglect of, or unresponsiveness to, a child's basic emotional needs.

**Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Additional forms of abuse are also recognised as being apparent within our communities. Whilst these do not find the same level of consistent understanding or application, they are particularly relevant for the church context, as follows:

**Organised/Institutional Abuse** may be defined as abuse involving one or more abusers and a number of children. The abusers concerned may be acting in concert to abuse children, sometimes acting in isolation, or may be using an institutional framework or position of authority to recruit children for abuse.

**Spiritual Abuse** is similar to emotional abuse on many levels, in that inappropriate expectations may be imposed upon children and young people. It may involve conveying to children the consequences of sinfulness in an inappropriate manner causing them fear and manipulating them into accepting what someone is preaching /teaching /saying. To say “You won’t go the heaven if you get run over by a bus on your way home” is a form of bullying, exploitation of emotions, manipulation of young minds and a corruption of the Gospel message. For further information, see the relevant sections of national Church of England guidance, particularly *‘Protecting All God’s Children’* and *‘Responding Well’*.

**Abuse Linked to Faith or Belief<sup>4</sup>** is based in a belief in ‘possession’ and ‘witchcraft’ and is widespread throughout the UK. It is not confined to people from particular countries, cultures or religions, nor is it confined to new immigrant communities in the UK. Nationally, the number of known cases of child abuse linked to accusations of ‘possession’ or ‘witchcraft’ is small, but children involved can suffer damage to their physical and mental health, capacity to learn, ability to form relationships and self esteem. Such abuse generally occurs when a carer views a child as being ‘different’, attributes this difference to the child being ‘possessed’ or involved in ‘witchcraft’, and attempts to exorcise him or her – either by themselves or through a faith leader. A child could be viewed as ‘different’ for a variety of reasons, such as disobedience, independence, bedwetting, nightmares, illness or disability. The attempt to ‘exorcise’ may involve severe beating, burning, starvation, cutting or stabbing, and/or isolation (physical, emotional, sexual abuse and neglect) and usually occurs in the household where the child lives.

---

<sup>4</sup> ‘Abuse Linked to Faith or Belief’ has attracted recent attention from government and the ‘National Action Plan for Tackling Child Abuse Linked to Faith or Belief’ (2012) has been published by the Department for Education.

## Signs & Symptoms of Abuse

The following should be used as indicators only that a child may be experiencing some form of abuse. They are not exhaustive lists and should not be used as a definitive guide as to whether abuse has or is being suffered. However, in using these signs as a guide, the presence of any of these signs should cause us to stop and consider the possibility that a child may be being abused.

### Physical Abuse

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<p>Bruises, black eyes and broken bones are obvious signs of physical abuse, but they are not the only ones. Other signs include:</p> <ul style="list-style-type: none"> <li>• injuries that the child cannot explain or explains unconvincingly</li> <li>• untreated or inadequately treated injuries</li> <li>• injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen</li> <li>• bruising which looks like hand or finger marks</li> <li>• cigarette burns, human bites</li> <li>• scalds and burns</li> </ul>	<p>Sometimes if a child is being physically abused they may show changes in behaviour, such as:</p> <ul style="list-style-type: none"> <li>• becoming sad, withdrawn or depressed</li> <li>• having trouble sleeping</li> <li>• behaving aggressively or being disruptive</li> <li>• showing fear of certain adults</li> <li>• showing lack of confidence and low self-esteem</li> <li>• using drugs or alcohol</li> </ul>

### Emotional Abuse

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<ul style="list-style-type: none"> <li>• speech disorders</li> <li>• delayed physical development</li> <li>• substance abuse</li> <li>• ulcers, severe allergies</li> </ul>	<ul style="list-style-type: none"> <li>• habit disorder (sucking, rocking, biting) antisocial, destructive</li> <li>• neurotic traits (sleep disorders, inhibition of play)</li> <li>• passive and aggressive - behavioural extremes</li> <li>• delinquent behaviour (esp. adolescents)</li> <li>• developmentally delayed</li> </ul>

## Neglect

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<ul style="list-style-type: none"> <li>• abandonment</li> <li>• unattended medical needs</li> <li>• consistent lack of supervision</li> <li>• consistent hunger, inappropriate dress, poor hygiene</li> <li>• lice, distended stomach, emaciated</li> <li>• inadequate nutrition</li> </ul>	<ul style="list-style-type: none"> <li>• regularly displays fatigue or listlessness, falls asleep in class</li> <li>• steals food, begs from classmates</li> <li>• reports that there is no carer at home</li> <li>• frequently absent or late</li> <li>• self-destructive</li> <li>• school dropout (esp. adolescents)</li> <li>• extreme loneliness and need for affection</li> </ul>

## Sexual Abuse

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<ul style="list-style-type: none"> <li>• pain, itching, bruising or bleeding in the genital or anal areas</li> <li>• genital discharge or urinary tract infections</li> <li>• stomach pains or discomfort walking or sitting</li> <li>• sexually transmitted infections</li> <li>• pregnancy</li> </ul>	<ul style="list-style-type: none"> <li>• a marked change in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically.</li> <li>• a young person may refuse to attend school or starts to have difficulty concentrating so that their schoolwork is affected</li> <li>• they may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities.</li> <li>• they may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age</li> <li>• the child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person</li> </ul>

## Why Don't Children and Young People Tell?

It is commonly believed that a child or young person would resist abuse at all costs or immediately tell a trusted adult. In fact children often need to overcome a number of barriers which may be emotional or intellectual but are very real for them. Children and young people often don't tell because they:

- are scared - because they have been threatened by the perpetrator
- believe they will be taken away from home and put in care
- believe they are to blame
- think it is what happens to all children
- feel shame, embarrassment or guilt
- don't want the abuser to get into trouble
- have communication or learning difficulties
- may not have the vocabulary to explain what happened
- are afraid they won't be believed

All of us have a natural revulsion upon hearing someone has maltreated a child and must resist our inclination to dismiss its possible truth in favour of a more comfortable rationale. The reasons adults do not share their concerns may be because we:

- find it hard to believe what we are seeing or hearing
- cannot believe the suspicion that may be about someone we know
- fear we might 'get it wrong' or make it worse
- fear the consequences of getting it wrong – for the child, young person or vulnerable adult, their family and/or for ourselves
- simply 'don't want to be involved'
- believe we do not have the information on what to do or who to contact.

In putting the needs and interests of children first in our thoughts and actions, we must be prepared to take what we see and hear at face value and act accordingly. Adults are usually more capable of recovering from misinterpretations and false allegations than a child is capable of recovering from the long-term effects of abuse that have gone without appropriate intervention by those that could have acted but didn't.



## Safeguarding Adults

'Promoting a Safe Church' (2006) seeks to raise the awareness of members of the Church of England of the needs of adults both within society in general and more particularly within the church community. It should be read in conjunction with the Church of England documents 'Protecting all God's Children' (2004) and 'Responding to Domestic Abuse – guidance for those with pastoral responsibilities' (2006). Society is recognising that people are being harmed when they are vulnerable for various reasons whether permanently or on a temporary basis and this abuse can take place in their own homes, in residential care, at work or in other activities including those provided by the Church. Some adults, who do not see themselves as 'vulnerable' under our working definition, may still find themselves exploited, bullied or abused. The safeguarding of adults when harm occurs is the responsibility of everyone. Awareness of the ways people can suffer harm encourages church members to be vigilant both within and outside the church community.

There is a particular responsibility for members of the Church to ensure that all people are treated with respect and that any complaints against church workers are dealt with promptly and fairly. Safeguarding adults within the Church is based on sound pastoral care and good practice.

### What is Vulnerability?

Human beings are, by their very nature, subject to the chances and changes of this world. Each one has strengths and weaknesses, capacities and restrictions. At some time everyone will be vulnerable to a wide range of pressures, concerns or dangers. No one is 'invulnerable'; some people may consider themselves to be strong but, when circumstances change, strengths can quickly disappear. Some people by reason of their physical or social circumstances have higher levels of vulnerability than others. It is the Christian duty of everyone to recognize and support those who are identified as being more vulnerable. In supporting a vulnerable person we must do so with compassion and in a way that maintains dignity. Vulnerability is not an absolute; an individual cannot be labelled as 'vulnerable' in the same way as a child is regarded as such. Childhood is absolute: someone who is not yet eighteen years of age is, in the eyes of the law, a child; this is not the case with vulnerability. Some of the factors that increase vulnerability include:

- A sensory, or physical disability, or impairment
- A learning disability
- A physical illness
- Mental ill health (including dementia), chronic, or acute
- An addiction to alcohol, or drugs
- The failing faculties of old age
- A permanent, or temporary reduction in physical, mental, or emotional capacity brought on by life events e.g. bereavement, trauma, or previous abuse

Within this policy, the term 'Adult' will be used to describe an individual for whom any or all of the above may be applicable and for whom the working definition below may be applicable.

### **What do we mean by 'mistreatment' and 'harm'?**

To help us focus on those people for whom the Church should have a particular care, "Promoting a safe church" offers this working definition of vulnerability to help:

*Any adult aged 18, or over, who, by reason of mental, or other disability, age, illness, or other situation is permanently, or for the time being unable to take care of him or herself, or to protect him, or herself against significant harm, or exploitation.*

Mistreatment is defined in 'No Secrets' (2000)<sup>5</sup> as 'a violation of an individual's human and civil rights by any other person, or persons'.

In the church this could be any misuse of a pastoral or managerial relationship, from the most serious to less severe behaviour, which lies at its root. The term covers abuse, bullying and harassment. Harm is what results from mistreatment and abuse.

### **Who might harm adults?**

Adults may be abused by a wide range of people including relatives and family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates, people who deliberately exploit vulnerable people and strangers. This includes those who work within the context of the Church.

There is often particular concern when abuse is perpetrated by someone in a position of power or authority who uses his or her position to the detriment of the health, safety, welfare and general wellbeing of a vulnerable person. Agencies not only have a responsibility to all vulnerable adults who have been abused but may also have responsibilities in relation to some perpetrators of abuse.

Stranger abuse will warrant a different kind of response from that appropriate to abuse in an ongoing relationship or in a care location. Nevertheless, in some instances it may be appropriate to use the locally agreed inter-agency adult protection procedures to ensure that the vulnerable person receives the services and support that they need. Such procedures may also be used when there is the potential for harm to other vulnerable people.

### **How might harm to adults happen?**

Abuse of adults may occur on a single occasion or on multiple occasions. Those adults who are particularly vulnerable due to their circumstances (especially those within residential or institutional care settings) may benefit from additional safeguards that assist to prevent the potential for abuse.

---

<sup>5</sup> 'No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse', Department of Health, 2000

Patterns of abuse and abusing vary and reflect very different dynamics. These include:

- serial abusing in which the perpetrator seeks out and ‘grooms’ vulnerable individuals. Sexual abuse usually falls into this pattern as do some forms of financial abuse;
- long term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations;
- opportunistic abuse such as theft occurring because money has been left around;
- situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour;
- neglect of a person’s needs because those around him or her are not able to be responsible for their care, for example if the carer has difficulties attributable to such issues as debt, alcohol or mental health problems;
- institutional abuse which features poor care standards, lack of positive responses to complex needs, rigid routines, inadequate staffing and an insufficient knowledge base within the service;
- unacceptable ‘treatments’ or programmes which include sanctions or punishment such as withholding of food and drink, seclusion, unnecessary and unauthorised use of control and restraint or over-medication;
- failure of agencies to ensure staff receive appropriate guidance on anti-racist and anti-discriminatory practice;
- failure to access key services such as health care, dentistry, prostheses;
- misappropriation of benefits and/or use of the person’s money by other members of the household;
- fraud or intimidation in connection with wills, property or other assets.

### **Where might harm to adults happen?**

Abuse can take place in any context. It may occur when an adult lives alone or with a relative; it may also occur within nursing, residential or day care settings, in hospitals, custodial situations, support services into people’s own homes, and other places previously assumed safe, or in public places, including churches.

Intervention will partly be determined by the environment or the context in which the abuse has occurred. Assessment of the environment, or context, is relevant, because exploitation, deception, misuse of authority, intimidation or coercion may render an adult incapable of making his or her own decisions. Thus, it may be important for the adult to be away from the sphere of influence of the abusive person or the setting in order to be able to make a free choice about how to proceed. An initial rejection of help should not always be taken at face value.

### **The prevalence of abuse of adults**

Information from small scale studies (e.g. MENCAP 1999, DH/Action on Elder Abuse 2005) indicates that the prevalence of such abuse (within the population that is served by the accepted definitions of a ‘vulnerable adult’) is higher than in the rest of the adult population. Aspects of peoples’ lives that can explain this increased vulnerability to abuse include:

- Lack of inclusion in protective social networks, including education and employment

- Dependency on others (who may misuse their position) for vital needs including mobility, access to information and control of finances
- Lack of access to remedies for abuse and neglect
- Social acceptability of low standards for care and treatment
- Social acceptability of domestic abuse
- Dynamics of power within institutional care settings

It follows that a key aspect of the prevention of abuse and neglect is that local forums and planning processes (including churches) are accessible to, influenced by and monitor inclusion of, people covered by 'Safeguarding Adults' policies<sup>6</sup>.

---

<sup>6</sup> 'Safeguarding Adults: A national framework of standards for good practice and outcomes in adult protection work', ADSS, 2005

## Definitions of Abuse (Adults)

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. The following are taken from 'No Secrets':

**Physical Abuse** may include hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

**Sexual Abuse** may include rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.

**Psychological Abuse** may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

**Financial/Material Abuse** may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**Neglect (and acts of omission)** may include ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

**Discriminatory Abuse** may include racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

**Institutional/Organised Abuse** may occur where there is poor professional practice in a setting. This may take the form of isolated incidents of poor or unsatisfactory professional practice, at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. Repeated instances of poor care may be an indication of more serious problems.

As in the case of definitions of abuse for children and young people, we also need to be aware of forms of abuse that are perpetrated in the name of religion, faith or spirituality that do not find consistent understanding and application outside of the church/faith environment:

**Spiritual Abuse** may occur when inappropriate expectations are imposed upon adults. It may involve conveying to them the dire consequences of sinfulness so causing them to accept what someone is preaching /teaching /saying through bullying and causing them to be fearful. To say "You won't go the heaven if you get run over by a bus on your way home" is a form of bullying, exploitation of emotions, manipulation of minds and a corruption of the Gospel message.

## Signs & Symptoms of Abuse (Adults)

It may not always be obvious that an adult is being subjected to mistreatment or abuse; and it may not be appropriate to question them at the time. However there may be general indicators that something is amiss and that the adult is unhappy about their situation. Marked change in their behaviour or disclosure of concerns should be discussed with the Church Safeguarding Officer.

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<p>Some general indicators that may be noticed about the vulnerable person:</p> <ul style="list-style-type: none"> <li>• covering up or rationalising, injuries or demeaning behaviours towards them</li> <li>• confusion and / or denial that anything is amiss despite marked deterioration</li> <li>• withdrawal from things that they normally engage with or do</li> <li>• not being allowed to speak for themselves, or see others without permission</li> <li>• flirtatious, precocious or expressive sexual behaviour out of character</li> <li>• indications of unusual confinement e.g. closed off in a room</li> </ul>	<p>Behaviours that may be observed about the carer, family member or the person close to the adult at risk include:</p> <ul style="list-style-type: none"> <li>• getting the vulnerable person to pay for their (i.e. carer's) shopping / petrol / tickets</li> <li>• taking advantage of their naivety or trust</li> <li>• attitudes of indifference or anger towards the vulnerable person</li> <li>• blaming or chastising them e.g. that soiling themselves was deliberate</li> <li>• aggressive or harsh behaviour (threats, insults, harassment)</li> <li>• inappropriate display of affection or care</li> <li>• social isolation or restriction of activity</li> <li>• obvious absence of assistance or attendance</li> </ul>

## Good Practice Principles for Working with Adults

All church activities which support an individual deemed vulnerable / at risk should follow these five principles:

- presume capacity – that people are capable of making decisions, unless there is evidence otherwise
- support individuals to make their own decisions – giving all practicable help before considering making any decisions on their behalf
- distinguish unwise decisions – recognise that the person retains the right to make seemingly eccentric or unwise decisions
- act in their best interests – in all decisions or activities on their behalf
- take the least restrictive option – in any action that might affect their basic rights and freedoms

### Creating Safer Environments

Christian communities should be places where all people feel welcomed, respected and safe from abuse. The Church is particularly called by God to support those at the margins, those less powerful and those without a voice in our society. The Church can work towards creating a safe and non-discriminatory environment by being aware of some of the particular situations that create vulnerability. Issues which need to be considered include both the physical environment and the attitudes of workers. A person who might be considered vulnerable has the right to:

- be treated with respect and dignity;
- have their privacy respected;
- be able to lead as independent a life as possible;
- be able to choose how to lead their life;
- have the protection of the law;
- have their rights upheld regardless of their ethnicity, gender, sexuality, impairment or disability, age, religion or cultural background;
- be able to use their chosen language or method of communication;
- be heard.

### When might intervention be necessary?

In determining how serious or extensive abuse must be to justify intervention a useful starting point can be found in ‘Who Decides?’<sup>7</sup>. Building on the concept of ‘significant harm’ introduced in the Children Act, the Law Commission suggested that:

*“‘harm’ should be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an*

---

<sup>7</sup> ‘Who Decides: Making decisions on behalf of mentally incapacitated adults’, The Lord Chancellors Office, 1997

*avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development’.”*

The seriousness or extent of abuse is often not clear when anxiety is first expressed. It is important, therefore, when considering the appropriateness of intervention, to approach reports of incidents or allegations with an open mind. In making any assessment of seriousness the following factors need to be considered:

- the vulnerability of the individual;
- the nature and extent of the abuse;
- the length of time it has been occurring;
- the impact on the individual; and
- the risk of repeated or increasingly serious acts involving this or other vulnerable adults.

What this means in practice is working through a process of assessment to evaluate:

- Is the person suffering harm or exploitation?
- Does the person suffering or causing harm/exploitation meet the NHS and Community Care Act (1990) eligibility criteria?
- Is the intervention in the best interests of the vulnerable adult fitting the criteria and/or in the public interest?
- Does the assessment account for the depth and conviction of the feelings of the person alleging the abuse?



## **Section 13**

### **Managing Offenders in the Church Context**

The term 'offender' applies only to those who have a conviction or who have accepted a caution, reprimand or warning for a criminal offence. Note that acceptance of a caution is an admission of the offence and is, therefore, equivalent to a conviction. The caution will appear on the CRB/DBS certificate. The term 'suspected abuser' is used here to refer to those who have been the subject of allegations which have not been formally substantiated but which appear to be reasonably well founded.

Under the Rehabilitation of Offenders Act 1974 some old convictions and cautions are deemed spent after a period of time, which varies according to the offence. However, for the purpose of work with children or vulnerable adults no offence is considered spent. Some of those putting themselves forward for roles in the Church which involve or could involve working with children will have convictions or cautions on their record. A CRB/DBS check containing information of this kind is termed a positive, blemished or unclear disclosure. The term is also used if other relevant material is supplied.

It is the policy of the Church of England that all people with positive or blemished CRB/DBS checks should undergo a risk assessment from a suitably qualified person. The nature of the assessment should be proportionate to the matters disclosed. It is good practice for more than one person to be involved in the process of assessing risk. The diocesan safeguarding adviser should always be involved and will in certain cases commission a formal risk assessment. In the case of complex or borderline cases this good practice should include referral to a diocesan multi-disciplinary risk assessment panel. This can be a group drawn from the diocesan safeguarding management group.

Old, minor and unrelated offences will not prohibit otherwise suitable people from work with children. While not being complacent about risk, the Church understands that those who have done wrong are often capable of reform.

The same approach will be taken where the matters disclosed are not convictions but other relevant information which warrants or is in the process of investigation and risk assessment.

Anyone who seeks a position in the Church whose CRB/DBS check discloses that they are barred from working with children will be reported to the police by the DBS, as it is an offence for such a person to seek such work or for an employer knowingly to offer it.

#### **Convicted offenders against children**

Research has indicated that a higher proportion of convicted offenders against children may be found in church congregations than in the population generally.

It is therefore probable that many congregations will have people who have abused children among their worshippers, some of whom will be known. Not all will have committed sexual

offences; some will have been guilty of neglect, physical or emotional abuse. They may still present a risk to children. The church's duty to minister to all imposes a particular responsibility to such people.

However, this must not compromise the safety of children. If a congregation is generally aware of how offenders will be treated it will be easier to deal confidentially with a specific case, should one occur.

As well as people with convictions against children there are others whose position in a congregation may need to be carefully and sensitively considered to decide whether they pose a risk to children. This would include people convicted of violent or sexual offences against adults, including: domestic violence; people involved in drug or alcohol addiction; adults with a mental disorder or special needs which might, in rare cases, result in erratic behaviour. It would also include those who do not have convictions or cautions but where there are sound reasons for considering that they might present a risk to children. In appropriate cases the approach recommended below for managing sex offenders should be adopted.

### **Ministering to people who are known to have sexually abused children**

Where a sex offender is known, befriended and helped by a group of volunteers to lead a fulfilled life without direct contact with children, the chances of reoffending are diminished and the church has thus an important role contributing to the prevention of child abuse.

When it is known that a member of the congregation has sexually abused a child, the diocesan safeguarding children adviser must be consulted, so that a safe course of action can be agreed in conjunction with the relevant statutory agencies. A written agreement or contract will usually be entered into with the offender which reflects research evidence about the compulsive nature of child sexual abuse.

Where a small group is formed the membership should be chosen carefully. It should include the priest or a delegated representative, a churchwarden and a representative of the children or youth work team or the parish safeguarding children co-ordinator. The diocesan safeguarding children adviser should be consulted on the constitution of the group, and training of the group may be necessary.

If the offender's victim, or in some cases the victim's family, attends the church, it is likely to be necessary to introduce the offender to another congregation. Consideration must also be given to other people who have been abused in the past.

The offender should not accept any official role or office in the church which gives him or her status or authority; a child may deem that person to be trustworthy. Some roles, for example that of churchwarden, are statute-barred to people with convictions of this kind, including offences against the person.

A meeting should be held with the offender, explaining that the appointed small group and a few others from the congregation will need to know the facts in order to create a safe environment for him or her. Those needing to know are likely to include the clergy, churchwardens, the safeguarding children co-ordinator and any befriending volunteers. The children's work co-ordinator will need to be informed so that he or she does not inadvertently ask the person to volunteer. The police should be invited to the meeting, in addition to the probation service, the local authority and children's social care, if they have a role.

Consideration should be given to whether, with the offender's agreement, the congregation should be told. The advantages and disadvantages of this course of action should be carefully considered, including the offender's need for protection as a vulnerable adult.

It must be made clear that no one else apart from those identified on the agreement will be informed of the facts without the offender's knowledge. The highest levels of confidentiality should be maintained unless there is a breach of the agreement and it is necessary to inform others to protect a child.

The group should offer support and friendship as well as supervision. They should endeavour to keep channels of communication open.

Those with pastoral responsibility will need to discuss with the group appropriate ways for the offender to develop and grow as a Christian without putting him- or herself and others at risk.

### **The Agreement**

It will be necessary to establish clear boundaries, both to protect children and to lessen the possibility of the adult being wrongly accused of abuse. The diocesan safeguarding children adviser should assist in drafting a written agreement (referred to as a contract in the MAPPa guidance above) which might include the following elements:

- attend designated services or meetings only
- sit apart from children
- stay away from areas of the building where children meet
- attend a house group where there are no children
- decline hospitality where there are children
- never be alone with children
- never work or be part of a mixed-age group with children
- take no official role in the church.

The offender should be asked to sign the agreement. Other parties will be members of the group noted earlier. It should be made clear that as people change role, their successors will take on becoming involved.

The agreement should be enforced, and no changes made without consultation with the diocesan safeguarding children adviser and other parties involved. It should be made clear that a breach or

other relevant information could lead to a referral to the police and probation service and advice that the offender attends a different church.

The agreement should include provision for close support and pastoral care.

The agreement should be reviewed at regular intervals, at least annually, with the diocesan safeguarding children adviser. A review must take the form of a face-to-face meeting with the offender and at least two members of the group. The meeting should be recorded and the record retained.

An agreement must remain in place so long as the person is a part of the congregation, whether or not they are on licence or their name appears on the Sex Offenders Register.

If the agreement is breached, the police or the probation service should be informed. In some cases it may be possible to restrict attendance at church. If the person cannot be banned because they live in the parish, the advice of the diocesan registrar should be sought and a high level of supervision maintained. It may be necessary, following consultation with the police, to inform other relevant organizations that the person presents a risk.

If the person leaves the church for another church, then the police should be involved and a new agreement should be made. If the person leaves without informing anyone where or whether they might attend for worship, the police should be informed.

Whenever possible, the agreement should be drawn up as a two-way covenant: the church will agree to levels of support and appropriate access to worship etc. while the offender agrees to the appropriate behavioural guidelines included in the agreement.

### **Disclosures by perpetrators of past abuse**

In some cases offences only come to light after many years. In such situations, great sensitivity will be required. It must however be remembered that there may still be a substantial risk to children; therefore, the police should be informed of the offences.

## Supporting Survivors of Abuse

In 2002, Churches Together in Britain and Ireland published a report, 'Time for Action: Sexual Abuse, the Churches and a New Dawn for Survivors'. Since then, the Church has increasingly recognized the need to minister to survivors of sexual abuse. With the more recent completion of the Church of England's Past Child Protection Cases Review (2009), the visitation reports into the abuses suffered in the Diocese of Chichester (2012 and 2013) and developments in best practice concerning the protection of children and adults, it is timely to address the injustices suffered by survivors within our own communities.

Progress has been made in recognizing the consequences of sexual abuse. However, at both an individual and at church level, survivors of sexual abuse still see a need for better support and action in recognition of their suffering and pain. They continue to press the Church to provide safer communities where their experiences of abuse can be heard, and support offered.

Churches can be well placed, often in the heart of our communities, to offer safer places for survivors to come and where they can share their experiences. The call to follow Christ challenges us to stand at the edge of society and hear the needs of those whom we encounter on our journey. We are challenged to move beyond our own fears and reach out in compassion to those who need our support. In many situations this will only mean developing or adapting existing good work where pastoral ministry is given to those in need or marginalized within society (for example, bereavement support), so that our experience and skills within such fields can be extended in compassionate response to survivors of sexual abuse. In doing so, the Church gains hugely from the wisdom and the knowledge of the survivors themselves, who can contribute greatly to our communities.

Most survivors want to be heard and to have their very real pain and hurt acknowledged. They also want a compassionate response from the Church and to see action where this is needed to ensure others are safe. In cases where the context of abuse has been the Church, those who have been abused often want to be listened to and heard directly by someone in authority either within the diocese or nationally. Such meetings have been successfully held in other parts of the Anglican Communion and good practice has been developed.

### Diocesan Responsibilities

In order to respond well to those who disclose abuse from their childhood once adults, the diocese recognizes a number of key responsibilities that must be active to meet the needs of adult survivors:

***Diocesan Safeguarding Adviser*** – There are two distinct roles in working with issues relating to children and vulnerable adults, but the roles are sometimes combined, as they are in currently in the Diocese of Exeter. Information about abuse can reach the diocese through a wide variety of routes. The Adviser provides a source of expertise and advice about all matters relating to abuse. At a minimum, the Diocesan Safeguarding Adviser should always be informed by the diocese of

those cases that relate to clergy, employees or volunteers, and where matters are before a criminal or family court.

**Authorised Listeners** – Each diocese should appoint carefully chosen, competent and trained people who will be able to be ‘authorized listeners’ for those who disclose, in particular for those who disclose abuse from within the church community.

**External Authorities** – Diocesan authorities need to remember their wider duty to the general public and also their accountability to civil authorities in matters of sexual abuse. Whether or not the alleged abuse has taken place within a church context, a crime may have been committed and others could be at risk. The Diocesan Safeguarding Adviser will be able to provide further advice and have details of the appropriate contacts.

**Training Needs** – ‘Protecting All God’s Children’ places a requirement upon each diocese to provide training on safeguarding for all clergy and licensed lay workers either before they take up their appointment or during their first year in post. Pastoral response and care of those who have been abused should either be included in such training or made an additional requirement.

### Parish Responsibilities

In addition to the diocesan responsibilities, parishes are required to ensure that the environments in which disclosures of past and non-recent abuse are voiced are open and responsive. Those who have suffered sexual abuse may first disclose this within the life of their local parish church. This means that each parish should reflect the following:

- **Church for all** – Ensure that the church has a healthy culture of welcome and inclusion, which affirms personal value for all and where no one feels inappropriately judged.
- **Self criticism** – We can always do better, but only if we remain open to criticism and avoid complacency. This will help to avoid the dangers of falling into denial and defensiveness if a complaint is ever made. There should always be a healthy intolerance of behaviour that is unholy.
- **Training** – Clergy and others with pastoral responsibilities should have adequate training. This should include the provision of appropriate responses and support for any who have suffered sexual abuse.
- **Whole-church awareness** – Well-informed communities become safer and more caring places. It is recommended that training be arranged within the deanery or parish level, ensuring that it is led by those sensitive to the needs of survivors.
- **Specific sources of support** – All parishes should have named individuals who have particular responsibilities for safeguarding children and/or adults. These people may be a good first point of contact for a survivor who wishes to disclose. Their names should be made available on church noticeboards.
- **Link with the diocese** – The Diocesan Safeguarding Adviser will be a source of guidance and support for churches encountering issues around sexual abuse. At a minimum, the Diocesan Safeguarding Adviser should always be informed by the parish of those cases which relate to clergy, employees and volunteers, and where matters are before a criminal or family court.

## Parish Safeguarding Responsibilities (General Checklist)

Each parish (or benefice) should accept the prime duty of care placed upon the incumbent and the parochial church council to ensure the wellbeing of children in their care. In order to meet this responsibility, the PCC on behalf of the parish should:

- Create a culture of ‘informed vigilance’, which takes children and adults at risk seriously.
- Ensure that appropriate health and safety policies and procedures are in place.
- Provide appropriate insurance cover for all activities undertaken in the name of the parish.
- Ensure that current Health and Safety requirements are met for all groups involving children or adults. (Child care providers e.g. pre-school and nursery groups or afterschool clubs should take advice from the Diocesan Children’s & Youth Advisor about the regulations for their activity and the need to register the group with the Local Authority).
- Agree and implement a Parish Safeguarding Policy. This should be compliant with and incorporate the formal adoption of the Diocesan Safeguarding Policy, which is based on the House of Bishops’ Policy. Explicit consideration should also be given to specific local parish requirements.
- Appoint a Parish Safeguarding Representative, and inform the Diocesan Safeguarding Advisor of this person’s details. (The Parish Safeguarding Representative should be someone without other pastoral responsibility for children or adults in the parish. This person must ensure that any concerns about a child or adult, or the behaviour of an adult towards others, are appropriately reported both to the statutory agencies and to the Archdeacon. The Parish Safeguarding Representative post is subject to a Disclosure and Barring Service check).
- Ensure that appropriate pastoral care is available for those adults who have disclosed that they have been abused as children.
- Provide, as appropriate, support for all parents and families in the congregation, being particularly aware of parents whose children have suffered abuse.
- Ensure that those who may pose a threat to children and young people are effectively managed and monitored.
- Appoint a person, who may be different from the Parish Safeguarding Representative, to be a children’s advocate. (This person should be someone whom children know they can talk to about any problems, if they so wish).
- Display the “Childline” telephone number prominently on a notice-board that is accessible to children.
- Ensure that all those authorised to work with children and young people, or in a position of authority, are recruited according to current Safer Recruitment Practice guidelines, and appropriately appointed, trained and supported while in post.
- Provide all personnel authorised by the PCC to work with children with a copy of the Parish Safeguarding Policy, Procedures and any Good Practice Guidelines.
- Pay particular attention to children with special needs and those from ethnic minorities, to ensure their full integration within the church community, remembering that children with disability or those for whom English is not their first language or are isolated in any way are always more vulnerable to abuse.

- Review the implementation of the Parish Safeguarding Policy, Procedures and any Good Practice Guidelines at least annually, to ensure that the Parish is adhering to the practice laid down within the Policy. (Mission Communities, Rural parishes or parishes held in plurality may wish to join together to implement the Policy and Procedures. It should be noted, however, that people working in isolated situations can be vulnerable and extra care should be taken to ensure that behavioural guidance and Safeguarding Policy, Procedures and any Good Practice Guidelines are followed).
- Provide appropriate insurance cover for all activities with children and young people that are undertaken in the name of the parish. (Local ecumenical projects should agree which denomination's Child Protection Policy to follow, and this decision should be ratified by the Archdeacon and other appropriate church leaders).

Please note, legally the responsibility for ensuring safeguarding falls to the incumbent and the PCC. This cannot be changed by local arrangement. However, how that responsibility is discharged can vary considerably according to the context. As long as each PCC and incumbent formally records the decisions that it makes, provision, be it for safeguarding representatives, advocates or local safeguarding policies, can be shared between several parishes in the same benefice or mission community. This checklist can therefore apply by extension to more than one parish acting in concert.



## **Appendix A**

### **Diocesan Safeguarding Management Policy**

A wide range of people are involved in and responsible for the work of safeguarding in the Diocese of Exeter. The greatest number of these are the ordinary members of the laity of the Diocese who are encouraged to develop an attitude of informed vigilance about safeguarding in the parochial context. In that parish context, clergy, members of parochial church councils, safeguarding representatives and people involved in work with children and young people all have particular and important roles to play in ensuring that safeguarding is carried out effectively and consistently. Clergy have specific obligations to discharge (for example in relation to attendance at appropriate training) that if not fulfilled satisfactorily, can lead to an evaluation of their performance and approach (through Ministerial Review or a complaint through the Clergy Discipline Measure).

### **Diocesan Safeguarding Adviser**

Beyond the parochial context there is a network of relationships and responsibilities that determine how safeguarding is to be managed. Often these cohere around the work of the Diocesan Safeguarding Adviser but it is by no means the case that the Safeguarding Adviser is responsible for all safeguarding in the Diocese. Much of the detail of the Safeguarding Management Policy is to be found in the Safeguarding Protocol.

In organizational terms, the Safeguarding Adviser supports the work of the Diocesan Bishop in respect of clergy beneficed or licensed in the Diocese or holding the Bishop's Permission to Officiate, as well as licensed Readers and Lay Workers. The Safeguarding Adviser is line-managed by the Director of Human Resources, who also has oversight of safeguarding policy (which, for the most part, is developed and implemented by the Safeguarding Adviser). The Director of Human Resources is a regular contributor to the work of the Bishop's Staff, although there may be occasions when the Staff require input directly from the Safeguarding Adviser.

The Safeguarding Adviser in turn line manages the Assistant Safeguarding Adviser, including a responsibility for the Assistant's professional development. Given the nature of the casework involved, provision is also made for the Safeguarding Adviser to have regular access to a professional, external and independent mentor. Similar provision is also made available to the Assistant Adviser.

### **Diocesan Safeguarding Management Group**

The Safeguarding Adviser provides much of the capacity behind the Diocesan Safeguarding Management Group (DSMG). The independent Chair of DSMG is appointed by the Bishop's Diocesan Council and the Chair and the Safeguarding Adviser meet with the Diocesan Bishop on a regular basis. The DSMG formally also submits an annual report to the Bishop's Diocesan Council. The members of DSMG are drawn from within the life of the Diocese (typically including one archdeacon and any more local church representatives such as archdeaconry safeguarding advisers and the Cathedral safeguarding representative) and from other statutory organizations that also have safeguarding responsibilities (such as the local authority, police and probation service). The

DSMG establishes the parameters for the multi-agency aspects of safeguarding that then get implemented through a bespoke 'core group' each time a case arises.

### **Safeguarding Files**

With the support of the Assistant Safeguarding Adviser, the Safeguarding Adviser is responsible for the correct maintenance of the safeguarding files. The Director of Human Resources works with the Safeguarding Adviser and the Diocesan Bishop's personal staff to ensure that the clergy 'blue files' contain all necessary safeguarding information (as set out in the national guidance), that the blue files relate correctly to the safeguarding files and that both are appropriately comprehensive and up-to-date.

### **Disclosure and Barring Service**

Since the Safeguarding Adviser has direct responsibility for casework arising from criminal record checks through the Disclosure and Barring Service, as well as policy oversight for the same, a good working relationship has to exist with the Diocesan DBS Co-ordinator (as well as with, by implication, diocesan countersignatories). This is not at present at line management relationship but there needs to be clear communication and agreement on systems and the implementation of developments in policy and practice.

## Appendix B

### Writing a safeguarding policy

Each PCC needs to write and adopt its own Parish Safeguarding Policy. A series of parishes in a benefice or a Mission Community could have a common policy but it would need to be adopted by each PCC and care should be taken to address any differences between parishes as needed. Although legal responsibility rests with the PCC and the incumbent, it is very important that it is available to and 'owned' by the whole church community, since it will take everyone's involvement to implement it effectively. It would therefore be good practice to consult widely in the drafting of the document and to communicate its contents widely once it has been agreed.

As part of that policy, the PCC should adopt the Diocesan Safeguarding Policy and the two policies should be in tune with each other. The Parish Safeguarding Policy should then seek to reflect in more detail on the particular circumstances of the parish's common life, setting out local arrangements that are relevant, realistic and genuinely achievable given the resources available. The language of the policy, whenever possible, should be clear and straightforward, so that it can be understood by a wide range of people.

It can help to have an over-arching statement at the beginning of the policy that summarises the broad thrust of the more detailed provisions that follow. For example:

*Example Policy Statement for the Safeguarding of Children and Vulnerable Adults*

*The following policy statement was agreed at the PCC meeting held on .....*

*'As members of the PCC we commit our church community to the support, nurture, protection and safeguarding of all, especially the young and vulnerable. We recognise that our work with children, young people and vulnerable adults is the responsibility of the whole church community. We are fully committed to acting within current legislation, guidance, national frameworks and the Diocesan Safeguarding procedures. We will also act in an open, transparent and accountable way in working in partnership with the Diocesan Safeguarding Adviser, Children and Adult Social Care Services, the Police, Probation Services and other agencies to safeguard children and vulnerable adults. We welcome staff and volunteers who are recruited in accordance with House of Bishops' Interim Guidelines on Safer Recruitment 2013. This means we will ensure that those who are employed or who volunteer to work with children, young people and vulnerable adults are suitable for the role, that they know what the role entails and that they are supported in carrying it out.'*

The policy then might be broken down into a series of sections. The order of the sections and the level of detail of their contents will depend on the particular circumstances that apply but most parishes will need to include most, if not all, of the following:

- Information about the groups of people to whom services are being offered, the ways in which they may be vulnerable and what the risks are assessed as being

- Information about how the PCC will recruit, manage / supervise and support staff and volunteers who work with vulnerable people (in accordance with the latest legal requirements and national church guidance)
- Information about the provision of safeguarding training for staff and volunteers who work with vulnerable people
- Information about arrangements for reporting concerns (via national helplines, safeguarding advocates etc)
- Preparation for the reporting of concerns so that people react in an appropriate and timely way. This might involve some scenario planning for situations when, for example,
  - a child/vulnerable adult may disclose something that has upset or harmed them
  - someone else might report something that a child/vulnerable adult has told them, or that they believe that a child/vulnerable adult has been or is being harmed
  - a child/vulnerable adult might show signs of physical injury for which there appears to be no explanation
  - a child/vulnerable adult behaviour may suggest he or she is being abused
  - the behaviour or attitude of someone towards a child/vulnerable adult may cause concern
  - a child demonstrates worrying behaviour towards other children.
- Information about who would need to be contacted (and their contact details) in the event of an incident. Statutory agencies (police and/or children's or adults' services as appropriate) should be contacted as a first priority if there is an immediate risk of continuing harm to a vulnerable person. The Diocesan Safeguarding Adviser should be contacted as soon as possible in every circumstance and they will help to guide you in deciding who to contact next and how to manage the process. Among the other organisations to be contacted are the following:
  - the parish's insurer
  - Disclosure and Barring Service
  - Charity Commissioners
- The policy would also need to set out the PCC's commitment to co-operate fully with the Diocese and appropriate statutory agencies during any investigation into abuse, including when allegations are made against a member of the church community
- Information about arrangements for the provision of pastoral care to children and vulnerable adults and their families and to any member of the church community against whom an allegation is made.
- A commitment, in partnership with the Diocese and other agencies, to provide (where it is possible and safe to do so) care and supervision for any member of our church community known to have offended against a child or vulnerable adult, or to pose a risk to them.
- Identification of the people within the PCC and the parish who hold formal responsibilities for safeguarding (such as safeguarding representatives, people who are advertised as being safe to report a concern to, etc), with a summary of their responsibilities.

Once the policy has dealt with all of the relevant issues in the parish, it should conclude by specifying the arrangements by which the safeguarding policy itself will be reviewed and kept up-to-date.

## **Model Parish Recruitment of Ex-Offenders Policy**

The Diocese of Exeter uses the Disclosure and Barring Service (DBS) to assess the suitability of both volunteers and applicants for employment in positions of trust. We comply fully with the DBS Code of Practice and undertake to treat all volunteers/applicants fairly. We undertake not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.

Having a criminal record will not necessarily bar a volunteer/applicant from working within the diocese. This will depend on the nature of the position and the circumstances and background of the offences.

Where appropriate and justified under the current regulations, volunteers and applicants who are offered employment will be asked to apply for a check of their criminal record from the Disclosure and Barring Service before the appointment is confirmed. Enhanced Disclosures will include details of cautions, reprimands or final warnings, as well as convictions, and also information relating to police enquiries and pending prosecutions. An Enhanced Plus check will also involve a check against the barred list(s) for regulated activity with children and/or adults. It is illegal for a person who is on the appropriate barred list to apply to undertake regulated activity, just as it is illegal for an organization knowingly to enable such a person to undertake regulated activity on its behalf.

### **Applicants for Employment**

- Our written Policy for the Recruitment of Ex-Offenders will be made available to all Disclosure applicants on request at the outset of the recruitment process.
- For those positions where a Disclosure is required, all application forms and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- Where a Disclosure is to form part of the recruitment process, all applicants called for interview will be encouraged to provide details of their criminal record at an early stage in the application process through a Confidential Declaration form. Such information should be sent, under separate and confidential cover, to a designated person within the Diocese of Exeter. We guarantee that this information will be seen only by those who need to see it as part of the recruitment process.
- For posts not involving regulated activity or otherwise including contact with children and young people, we will only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974 as part of the application process. For those posts that do involve regulated or other related activity, applicants will be asked whether they have any convictions, cautions, reprimands or final warnings which would not be filtered in line with current guidance.
- The person designated to assess the implications of any convictions with respect to the post applied for (normally the DSA or the Director of Human Resources), will have been suitably

trained to identify and assess the relevance and circumstances of offences. They are familiar with the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

- At interview, or in a separate discussion, we will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to the withdrawal of an offer of employment.
- Every subject of a DBS check will have access to the DBS Code of Practice, and copies will be available on request or can be viewed on the [Diocesan website](#).
- We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

### **Volunteers**

- Those involved in the recruitment of volunteers will make it clear to a candidate whenever a Disclosure is required.
- Every subject of a DBS check will have access to the DBS Code of Practice, and copies will be available on request.
- Our written Policy for the Recruitment of Ex-Offenders will be made available to all Disclosure applicants on request at the outset of the recruitment process.
- All Disclosure applicants will be invited to provide details of any criminal record at an early stage through a Confidential Declaration form.
- We guarantee that Disclosure information will be seen only by those who need to see it as part of the recruitment process.
- The person designated to assess the implications of any convictions with respect to the post applied for (normally the DSA or the Director of Human Resources), will have been suitably trained to identify and assess the relevance and circumstances of offences. They are familiar with the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

We undertake to discuss with a volunteer any matters revealed in a Disclosure which relate directly to the position for which they have offered themselves. The welfare of children and vulnerable adults will always be our first concern.

## **Model Parish Policy Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information**

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, the Parochial Church Council of ..... complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. This written policy is available on request to all those who wish to see it.

### **Storage and Access**

Disclosure information is never kept on an applicant's personal file and is always kept separately and securely in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

### **Handling**

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it within the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

If a party other than the Diocese requests the passing on of Disclosure information, advice will be sought from DBS before doing so.

### **Usage**

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### **Retention**

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months after the decision has been taken, we will consult the DBS about this. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail. The DBS will be informed immediately if a Disclosure document, or additional information provided by the police, is mislaid or lost.

### **Disposal**

Once the retention period has elapsed, or sooner, we will ensure that any Disclosure information is destroyed by shredding. Prior to shredding the Disclosure documents will always be kept in secure

places as described above. We will not retain any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.

Notwithstanding the above, a record will be kept of: the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested (including the designated workforce; child, adult or both), the position for which the Disclosure was requested, the unique reference number of the Disclosure, and the details of the recruitment decision taken.