Holy Trinity Church Tewkesbury

Children and Young People Safeguarding Policy

***DRAFT***

April 2024

Holy Trinity Church Office

10 Oldbury Rd, Tewkesbury

GL20 5NA

Tel: 01684 292797

**Cross Referencing**

**This policy should be read in conjunction with the following policies:**

* Adults at Risk Safeguarding Policy
* Safer Recruitment (including Policy Statement for Recruitment of ex-Offenders)
* Social Media Policy

**Document History:**

**Replaces Holy Trinity Working with Children and Young People (2017)**

Validity: 12 months. Reviewed annually and agreed at ACPM

Change History:

|  |  |  |
| --- | --- | --- |
| **Date** | **Version (YMD\_IN)** | **Changes** |
| June 2019 | Draft V1 | This Policy has been written to reflect the Diocese of Gloucester Safeguarding Handbook Guidance  Initial draft provided to PCC, Church Staff and Church Safeguarding Officers for review |
| September 2019 | Final copy for approval | Submission to PCC following consultation and amendments – document is now in 2 parts  Part 1 PCC roles and responsibilities  Part 2 Staff and Volunteer safeguarding handbook |
| 3rd September 2019 | Final | Approved by PCC and recorded in minutes |
| April 2022 | Update draft | Changes highlighted in yellow for ease of reference:   * Updated with changes in contact details and names of PSO * Include a statement to formally acknowledge adoption of ‘Promoting a Safer Church’ (House of Bishop’s Safeguarding Policy) * Include broader commitment to be responsible for identifying vulnerable children * Updated guidance in ‘Responding to a concern – your role’ * Include training in appendix 4 (Guidance on activities and environment) * Included some additional useful contacts in appendix 5 |
| April 2023 | Update final | Appendix added for statement regarding policy for recruitment of ex-offenders  Update on Safer Recruitment for Volunteers  Update on Church list of arranged activities |
| April 2024 | Update final | Update to cover page to include cross references with other policies  Updated reference to Working Together to Safeguard Children (Dec 2023) document  Update on Church list of arranged activites (to include all groups)  Update to Safer Recruitment statement to include volunteers  Removal of definitions of Types of Abuse from Part 1: Section 1 (to avoid repetition in Part 2: Section 2)  Update to Other Useful Numbers/Contacts |

Outstanding questions:

|  |  |  |  |
| --- | --- | --- | --- |
| **Date** | **Source** | **Issue** | **Resolved** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

Please submit any comments on this document to:

|  |  |
| --- | --- |
| Duncan de Gruchy (Parish Safeguarding Officer)  Helen Hart (Church Administrator) | [safeguarding@trinitytewkesbury.org.uk](mailto:safeguarding@trinitytewkesbury.org.uk)  [office@trinitytewkesbury.org.uk](mailto:office@trinitytewkesbury.org.uk) |

Contents

[General Policy Statement 4](#_Toc163137177)

[Part 1 – PCC Role and Responsibilities 6](#_Toc163137178)

[1. Definition of Abuse 6](#_Toc163137179)

[2. Promotion of Safe Church Environment and Activities 6](#_Toc163137180)

[Current Activities 7](#_Toc163137181)

[3. Ensuring safer recruitment and selection 8](#_Toc163137182)

[Disclosure and Barring (DBS) 9](#_Toc163137183)

[Duty to refer to the DBS 9](#_Toc163137184)

[The DBS process 9](#_Toc163137185)

[Storage of safeguarding records 10](#_Toc163137186)

[Part 2 - Holy Trinity Tewkesbury Staff and Volunteer Safeguarding handbook 10](#_Toc163137187)

[1. Safe Practice 10](#_Toc163137188)

[2. Definition of Abuse 10](#_Toc163137189)

[3. Pathway for Dealing with Disclosure of Abuse and Procedure for Reporting Concerns 13](#_Toc163137190)

[Responding to a child – your role 15](#_Toc163137191)

[Reporting allegations of Abuse against Members of Staff 16](#_Toc163137192)

[Confidentiality 17](#_Toc163137193)

[Supporting your wellbeing 17](#_Toc163137194)

[Appendix 1 Signs and Symptoms of Abuse 17](#_Toc163137195)

[Appendix 2 Concern Reporting form 22](#_Toc163137196)

[Appendix 3 Parish Safeguarding Officer documentation 28](#_Toc163137197)

[Appendix 4 Diocese Guidance on Safe Environment and Activities 31](#_Toc163137198)

[Appendix 5 Designated persons 2023 34](#_Toc163137199)

[Appendix 6 – Policy Statement for Recruitment of Ex-Offenders 35](#_Toc163137200)

# General Policy Statement

***Holy Trinity Church Tewkesbury*** has a moral and legal duty to ensure that it functions with a view to safeguarding and promoting the welfare of children and young people. As a church we recognise our collective responsibility for the safeguarding of all children and young people under the age of 18 are committed to fulfilling the requirements of the Children Act 1998 and 2004, Safe from Harm (HM Government 1994) and Working Together to Safeguard Children (HM Government 2018) and other relevant legislation aimed at the protection of children.

The **2004 Act** makes clear that everyone who comes into contact with children and families has a role to play in:

• 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

• taking action to enable all children to have the best outcomes

|  |
| --- |
| Furthermore we have a role in responding to what **children have said that they need** ([Working Together to Safeguard Children guidance 2023](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2)) |
| * *vigilance*: to have adults notice when things are troubling them * *understanding and action*: to understand what is happening; to be heard and understood; and to have that understanding acted upon * *stability*: to be able to develop an ongoing stable relationship of trust with those helping them * *respect*: to be treated with the expectation that they are competent rather than not * *information and engagement*: to be informed about and involved in procedures, decisions, concerns and plans * *explanation*: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response * *support*: to be provided with support in their own right as well as a member of their family * *advocacy*: to be provided with advocacy to assist them in putting forward their views * • *protection*: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee |

Throughout this Policy a child is defined as anyone who has not yet reached their 18th birthday. ‘**Children**’ therefore means ‘**children and young people’** throughout

Holy Trinity Tewkesbury Parochial Church Council (PCC) is committed to ensuring that the Church:

* Provides a safe environment for all children;
* Identifies children who are suffering;
* Identifies children who are vulnerable or at risk;
* Takes appropriate action to see that children are kept safe from harm.

In pursuit of these aims, Holy Trinity Church Tewkesbury PCC will approve and annually review Church policies with the aim of:

* Raising awareness of issues relating to the welfare of children and the promotion of a safe environment for the children;
* Providing procedures for reporting concerns;
* Establishing procedures for reporting and dealing with allegations of abuse against members of staff;
* Recruiting and managing staff and volunteers safely.

As a Church, Holy Trinity has adopted the guidance and principles of ‘[Promoting a Safe Church: Safeguarding policy statement for children, young people and adults](https://www.churchofengland.org/sites/default/files/2017-12/PromotingSaferChurchWeb.pdf)’ as required by the House of Bishop’s Safeguarding Policy.

As a Church we appoint a Parish Safeguarding Officer with designated responsibility for children, young people and adults at risk protection issues.

Staff and volunteers working with children will receive training adequate to familiarise them with safeguarding issues and responsibilities and the Churches relevant procedures, with refresher training at least every 3 years.

Holy Trinity Tewkesbury PCC will receive, from the Parish Safeguarding Officer, an annual report, which reviews how their duties have been discharged.

# Part 1 – PCC Role and Responsibilities

# Definition of Abuse

It is helpful as a starting point to ensure a collective understanding of the term ‘abuse’. Holy Trinity Tewkesbury PCC recognise the following as definitions of abuse as detailed in Working Together to Safeguard Children 2018:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult, adults, another child, or children. Abuse is defined as four categories:

* Physical
* Emotional
* Sexual
* Neglect

More details and definitions of these types of abuse can be found in the table in Part 2: Section 2 (p 11).

# **Promotion of Safe Church Environment and Activities**

*“The Church will strive to create and maintain environments that are safer for all, that promote well-being, that prevent abuse, and that create nurturing, caring conditions within the Church for children, young people and vulnerable adults…The Church will strive to support all church officers to adhere to safer working good practice and to challenge the abuse of power”. (The House of Bishops’ Safeguarding Policy Statement)*

Holy Trinity Tewkesbury PCC members, as Trustees, have a legal duty to safeguard children and young people and to show due diligence to the House of Bishops statement. We have a high number of children attending church led activities regularly and have paid staff and volunteers providing these in both church buildings and other locations. The Diocese safeguarding handbook provides a Code of Safer Practice for all work with children (detailed in appendix 4) The PCC has adopted this code and expects all staff and volunteers to follow it within church activities. Furthermore, Holy Trinity has a Social Media Policy which all staff and volunteers must follow <https://www.trinitytewkesbury.org.uk/Publisher/File.aspx?ID=225570>

To support Holy Trinity Tewkesbury in discharging its safeguarding responsibilities it has followed the Church of England Safeguarding Handbook (2018) advice that each Parish have a designated person, known as the Parish Safeguarding Officer (PSO), with lead responsibility for child protection issues.

1. The PSO has a key duty to take lead responsibility for raising awareness within the organisation of issues relating to the welfare of children, and the promotion of a safe environment for children.
2. The PSO will undertake appropriate training and should keep up to date with developments in child protection issues. The PSO will also have responsibility for making new staff and volunteers aware of the existing children and Young People Safeguarding Policy.

The PSO will be the main contact point for child safeguarding issues and will have contact details for relevant organisations.

## Current Activities

Holy Trinity Tewkesbury provides a number of children’s, young people and vulnerable adult activities throughout the week led by staff and volunteers either with or without parental attendance:

List of Church Activities

|  |  |  |  |
| --- | --- | --- | --- |
| ***Children’s*** | ***Youth*** | ***Vulnerable Adults*** | ***All Groups*** |
| Open the Book  Smarties  TJC  School Assemblies  Holiday Club  Light Party  Experience Events (eg Easter, Pentecost & Christmas)  Messy Church | Grid  Energize  Youth Cell  Christian Union  Youth residentials (eg Limitless & Gaines  Puppets  Youth Socials (eg Film nights & ice skating)  Movement  Pudding & Quiz Night  The Buzz  It’s Your Move  Soul Survivor  ‘Seek the Lord’ (Youth Sleep over)  Satellites (Youth Residential Festival)  Celebrate Service  Games Night (Afterhours)  Mop Fair (serving) | Weds @ 10.30  Outlook  Communion (in the community)  Chaplaincy Prayer Meetings  Life Groups  Ladies’ Breakfast  Men’s Breakfast  Care Home Visits  An Afternoon For Me | The Welcome Table  Family Fun Day  Family Picnic  Big Weekend |

The Safeguarding Vulnerable Groups Act (2006) would describe the above as ‘Regulated Activity’ and therefore it is important to ensure DBS expectations are met. Regulated Activity is defined as:

* 1. Any activity which involves work solely or mainly with children and at risk adults. Anyone involved in undertaking such work or supervising it will be required to register with the DBS.
  2. To qualify as such a ‘regulated activity’ must take place frequently (at least 4 or more times in a single month) or intensively (once or more a week and overnight).
  3. In addition, if the regulated activity takes place in a school, nursery, day centre, care home, remand centre or hospital, anyone working in such setting will be required to register with the DBS whether or not they work directly with at risk groups.
  4. A church can be classified as a specified setting if all or part of its premises is used as a school, nursery or day centre. However, this only applies during the time that it is used for such purpose. Anyone working on the premises at the time may be required to register with the VBS if there is opportunity for contact with children or at risk adults.
  5. Failure to register with the DBS is not an offence in itself. However, if a barred person knowingly works in a regulated activity or specified setting they will be deemed to have committed an offence and will be liable to a fine or imprisonment or both. Likewise, if the organisation knowingly employs a barred person, it will be deemed to have committed an offence and its representatives may be liable to a fine or imprisonment (or both).

# Ensuring safer recruitment and selection

Holy Trinity Tewkesbury PCC is responsible for safer recruitment and selection of employed staff and volunteers. The Gloucester Diocese Safeguarding Handbook provides guidance to local parishes for staff and volunteers.

Holy Trinity PCC has an appointment and selection procedure for employed staff and (from November 2022) includes volunteers of roles in ‘regulated activities’.

The ‘Safer Recruitment’ process will be be reviewed annually to ensure that they always take account of the following:

* That they apply to staff and volunteers who may work with at risk adults.
* That the post or role should be clearly defined.
* The key selection criteria for the post or role should be identified.
* Vacancies should be advertised widely in order to ensure a diversity of applicants.
* Obtain professional and character references.
* Verify previous employment history.
* DBS disclosure.
* Use a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks).

In addition the PSO is responsible for ensuring that exempted questions are asked on relevant volunteer engagement and employment application forms.

The question can be worded accordingly:

*This post meets the requirements in respect of exempted questions under the Rehabilitation of Offenders Act 1974, any applicants for this post who are offered employment or who become volunteers for this organisation will be subject to a criminal record check from the Criminal Records Bureau before the appointment is confirmed. This will include details of cautions, reprimands or final warnings as well as convictions. A criminal record will not automatically bar a person from successfully taking up this post.*

## Disclosure and Barring (DBS)

The Disclosure and Barring Service (DBS) is a non-departmental public body of the Home Office of the United Kingdom. The DBS enables organisations in the public, private and voluntary sectors to make safer recruitment decisions by identifying candidates who may be unsuitable for certain work, especially that involves children or vulnerable adults, and provides wider access to criminal record information through its disclosure service for England and Wales. It is illegal for anyone barred by the DBS to work, or apply to work with the sector (children or adults) from which they are barred. It is also illegal for an employer to knowingly employ a barred person in the sector from which they are barred.

## Duty to refer to the DBS

The Children Act 2004 makes it mandatory to refer anyone known to pose a threat of harm to a child to the DBS. This duty to refer remains in place despite suspension of the DBS. The designated member of staff responsible for safeguarding must not knowingly employ anyone, paid or unpaid, who poses a risk of harm to children or vulnerable adults, this includes anyone who is believed to have committed a relevant conduct while on the job or who has a record of such conduct.

A ‘relevant conduct’ includes any:

* conduct which endangers children or is likely to endanger children;
* conduct which if repeated against or in relation to a child would endanger that child;
* conduct involving sexual material relating to children (including possession of such material);
* conduct involving sexually explicit images depicting violence against human beings;
* conduct of a sexual nature involving a child (or in the case of a child - an act that is considered inappropriate).

## The DBS process

Holy Trinity Tewkesbury has a clear process in place for undertaking DBS checks. The Children and Family Worker and Youth Pastor provide names of any new volunteers to the Church Administrator. The Church Administrator advises the volunteer on the DBS process, undertakes document checking and liaison with the Diocese to submit to DBS. All certificates are viewed and both certificate number and renewal date recorded on the church DBS database, which is stored in line with GDPR.

Information on DBS can be found here:

<https://www.gov.uk/disclosure-barring-service-check/overview>

Holy Trinity Church has a legal duty to refer an employee or volunteer who poses a risk of harm to children or vulnerable adults to the DBS, failure to do so can result in a fine and/or up to 5 years imprisonment. If a concern is raised the PSO will work with the Diocese Safeguarding Advisor to agree if there is sufficient and solid evidence that the employee or volunteer poses a risk of harm before they are referred to the DBS. The DBS will not consider evidence based on rumour or unsubstantiated reports. The PSO will also inform the police and other relevant authorities if they believe a relevant conduct has occurred.

Referral forms can be found here: <https://www.gov.uk/government/organisations/disclosure-and-barring-service>

## Storage of safeguarding records

The PCC is responsible for the safe storage and retention of any safeguarding records. No records should be destroyed in line with Diocese guidance, recognising historical abuse claims and the importance of maintaining information to support any future report / allegation. The PSO and the Diocese will retain all safeguarding records in line with GDPR. These will be held electronically wherever possible but if paper record is required then it will be taken to the Diocese safeguarding department who will store it securely on our behalf. For staff and volunteers who raise a concern they will be asked to provide a written report using an electronic form and send this by email to the PSO. Once receipt has been confirmed they will be asked to permanently delete any electronic records / emails from their personal computer.

# Part 2 - Holy Trinity Tewkesbury Staff and Volunteer Safeguarding handbook

# Safe Practice

All of the Staff and Volunteers Holy Trinity Tewkesbury have a responsibility to work in a way that promotes the physical, emotional, behavioural, social and spiritual wellbeing of the children we serve. The Church of England has set out clear guidelines on safe practice, detailed in Appendix 4, and Holy Trinity PCC has adopted. In following these principles not only will our children be more likely to flourish but also both they and you will be safeguarded. As a church, we are thankful for the considerable time and energy that many give to our children and family ministry and this handbook is a key resource in providing clarity to support safeguarding good practice.

# Definition of Abuse

It is helpful as a starting point to ensure a collective understanding of the term ‘abuse’. Holy Trinity Tewkesbury PCC recognise the following as definitions of abuse as detailed in Working Together to Safeguard Children 2018:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult, adults, another child, or children. Abuse is defined as four categories:

* Physical
* Emotional
* Sexual
* Neglect

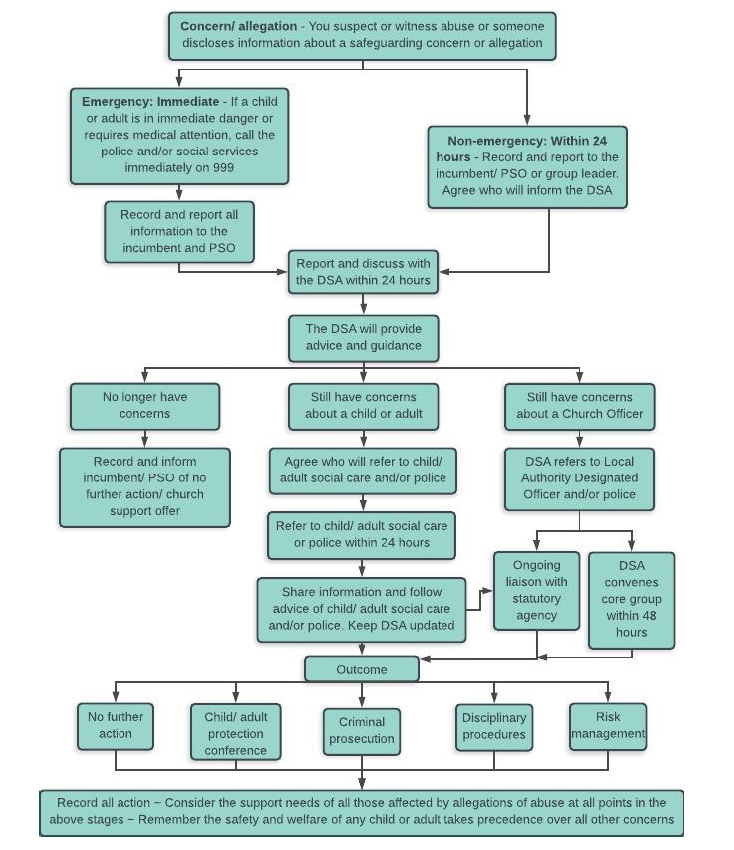
Which can be described as follows:

|  |
| --- |
| **Type of abuse** |
| **Physical Abuse**  Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately induces illness in a child. |
| **Emotional Abuse**  Emotional abuse is the persistent emotional ill-treatment 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 include not giving the child opportunities to express their views, deliberately silencing them or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child’s developmental capability, as well as over-protection 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 (including cyberbullying) causing children frequently 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. |
| **Sexual Abuse**  Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. |
| **Neglect**  Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:   * provide adequate food, shelter and clothing, (inc exclusion from home or abandonment) * protect a child from physical and emotional harm or danger * ensure adequate supervision (including the use of inadequate care-givers) or * ensure access to appropriate medical care or treatment.   It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. |
| **Additional types of abuse experienced by children** |
| **Grooming**  Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation, trafficking or criminal activity. Grooming may also include threats or bribes, which persuade the person that it would be impossible to ask for help. It may appear as an unhealthily close friendship which stretches or breaks approved boundaries. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.  Methods of making contact online via social networking and chat-based applications (often used on mobile phones) are often used for this, although grooming can take place face-to-face. When grooming takes place online it is easy for potential abusers to disguise their identity, including their gender, location and age. |
| **Child Sexual Exploitation**  Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. |
| **Domestic Violence and Abuse**  Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse **between those aged 16 or over** who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:   * psychological * physical * sexual * financial * emotional |
| **Spiritual and ritual abuse**  In the church context there has been developing realisation that spiritual abuse is another form of harm and occurs when religious values or ideas are “forced” onto people, particularly those who are vulnerable to such practices. This can be the inappropriate use of religious belief or practice: including misuse of the authority of leadership or penitential discipline, oppressive teaching, or intrusive healing and deliverance ministries, which could result in vulnerable people experiencing physical, emotional or sexual harm. Other forms of spiritual abuse include the denying vulnerable people the right to faith or the opportunity to grow in the knowledge and love of God. Any such inappropriate behaviour must be investigated. Careful supervision and mentoring of those entrusted with the pastoral care of children should help to prevent harm occurring in this way. |

More detail on signs and symptoms can be found in Appendix 1

# Pathway for Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

The Diocese of Gloucester has clear procedures and pathways for all churches to follow where a concern, disclosure or allegation has been made – see flowchart below. Holy Trinity has adopted these as best practice.

*Flowchart of Safeguarding process*

*Source: Diocese of Gloucester Safeguarding Handbook 2018*

For a safeguarding issue that is ***an emergency***, i.e the child is in immediate danger or requiring medical attention 999 and/or Social Services should be called immediately.

If ***not an emergency*** the first point of contact is a member of the Holy Trinity Safeguarding team, one of which is on duty each Sunday. At other activities / days of the week please contact the Parish Safeguarding Officer (PSO) or Vicar whose numbers are in the church directory (and also held by the Church Office).

If you have to leave a message you must not give details of the person you are concerned about. Just provide your name and contact number and state you are calling regarding safeguarding so they know to respond promptly. A written report of concerns, using the forms in appendix 2, should be emailed to [safeguarding@trinitytewkesbury.org.uk](mailto:safeguarding@trinitytewkesbury.org.uk) within 24 hours of concern being raised. The PSO will liaise with the Diocese safeguarding Advisor (DSA) to agree response, undertake response and ongoing liaison and oversight.

## Responding to a child – your role

It can be very difficult for a child to disclose abuse, it may well be the first time they have talked about it and may be very scared about what will happen once they have told someone. Your response to them both verbally and in your body language is extremely important. Any disclosure made has to be considered as factual, true and importantly the child needs to know you believe what they are telling them, that you are not judging them or angry at what they are telling you and that you will do something.

**Do**

* Listen.
* Take what is said seriously.
* Only use open questions (open questions begin with words like: who, what, when, where and how. Open questions cannot be answered with a ‘yes’ or ‘no’).
* Remain calm.
* Take into account the person’s age and level of understanding.
* Check, if face to face, whether they mind you taking notes while they talk so you can make sure you capture the information accurately. At the end you can check with them that you have understood everything correctly.
* Offer reassurance that disclosing is the right thing to do.
* Establish only as much information as is needed to be able to tell your activity leader/ Parish Safeguarding Officer/ DSA and statutory authorities what is believed to have happened, when and where.
* Check out what the person hopes to result from the disclosure.
* Tell the child or adult what you are going to do next.

**Do Not**

* Make promises that cannot be kept (e.g. that you won’t share the information).
* Make assumptions or offer alternative explanations.
* Investigate.
* Contact the person about whom allegations have been made.
* Do a physical or medical examination.
* Do not offer a judgement about the disclosure or appear shocked.

**Record**

* Do not destroy your original notes in case they are required by the DSA or the statutory authorities.
* Make some very brief notes at the time, if appropriate, and write them up in detail as soon as possible using the Holy Trinity concerns log form (appendix 2).
* Record the date, time, place, words used and how they appeared to you. Record the actual words used, including any swear words or slang.
* Record facts and observable things, not your interpretations or assumptions.
* Don’t speculate or jump to conclusions.
* Email the completed concern log to [safeguarding@trinitytewkesbury.org.uk](mailto:safeguarding@trinitytewkesbury.org.uk) within 24 hours of disclosure / allegation or concern.
* Follow up the email report with a text or phone call to alert the PSO that a report has been submitted.

**Report**

* If there is immediate danger to a child or adult contact the police.
* Otherwise report to your activity leader / Parish Safeguarding Officer/Vicar immediately.
* Within 24 hours the PSO/Vicar reports the concerns to the DSA.
* The DSA will advise regarding reporting to statutory agencies within 24 hours.
* If there is any doubt seek advice from social services (01452 426565 – Children’s Services) or the police.

## Reporting allegations of Abuse against Members of Staff

The procedures detailed above (flowchart and responding to a child) apply to all staff, whether ministerial, administrative, wider church leadership, support, as well as to volunteers. The word “staff” is used for ease of description.

In rare instances, staff of Christian organisations have been found responsible for child abuse. Because of their frequent contact with child, staff may have allegations of child abuse made against them. Holy Trinity Church recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

Holy Trinity recognises that the Children Act 2004 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual’s reputation, confidence and career. Therefore, those dealing with such allegations within the organisation will do so with sensitivity and will act in a careful, measured way.

## Confidentiality

With data protection (DP) and more recently GDPR legislation, many people are worried about sharing information. The law is quite clear however that the welfare of the child is paramount (ie Safeguarding trumps GDPR and DP) and if you have concerns then they should be shared. Many child deaths have been investigated and concluded that people / organisations held on to information which had it been shared could have provided a better picture of what was happening in the child’s life and could have prevented their death. On the other hand, there are also cases where information has been shared inappropriately leading to devastating consequences for innocent people who have suffered harassment violence through gossip / vigilante responses.

**What is essential is that information / concerns are shared appropriately i.e. can you justify what you have shared and with who?**

**You can double check by asking yourself:**

Am I following the church safeguarding flowchart – i.e. is the person I am telling one of the following?

* the Group Leader of the session
* PSO or Trinity Safeguarding Officer
* Vicar
* Diocese Safeguarding Advisor
* Police or
* Social Services

If the answer is a no then it is probably not appropriate.

It is important to keep any documentation you have secure until you can give it to the PSO, so that others don’t accidently come across it. Once the PSO has confirmed receipt of your concern report you must delete any electronic record / emails that hold information about the child from your personal computer. Any paper notes should be provided to the PSO for secure storage or if appropriate i.e. scanned or included in electronic record, safe disposal.

## Supporting your wellbeing

We recognise that dealing with a safeguarding issue can be emotionally hard; anger, sadness, shock, fear are common responses and it is important that you are cared for too. Having someone to chat through how you are feeling is usually helpful. Recognising the need to maintain confidentiality the Trinity safeguarding team / or the Diocese Safeguarding team are available to provide a listening ear and if needed arrange further support.

# Appendix 1 Signs and Symptoms of Abuse

| **Abusive Actions** | **Signs and Symptoms** |
| --- | --- |
| **Physical**   |  | | --- | | * Shaking * Kicking * Pushing * Slapping * Hitting * Inappropriate restraint * Withholding or misuse of medication * Squeezing * Biting * Suffocating * Poisoning * Drowning * Killing * Physical abuse may also be caused when a parent or carer fabricates symptoms of, or deliberately induces, illness in a child. This is called Fabricated or Induced Illness. * Involuntary isolation or confinement, * Inappropriate application of techniques or treatments. | | |  | | --- | | * Cuts, lacerations, puncture wounds, open wounds, bruising, welts, black eyes, burns, bite marks, broken bones and skull fractures * Untreated injuries in various stages of healing or not properly treated * Poor skin condition or poor skin hygiene * Dehydration and/or malnourishment without an illness-related cause * Loss of weight * Soiled clothing or bedding * Broken eyeglasses or frames * Physical signs of being subjected to punishment or signs of being restrained * Inappropriate use of medication, overdosing or under dosing * Cowering and flinching * Emotional distress, low self-esteem, untypical self-harm * Telling you they have been hit, slapped or mistreated * Aggressive behaviour or severe temper outbursts * Reluctance to get changed, for example in hot weather * Depression * Withdrawn behaviour   Remember: Most children will collect cuts and bruises as part of the rough-and- tumble of daily life. However, important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the ‘soft’ parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.  Children may also display:   * Fear of parents being approached for an explanation * Running away from home | |
| **Sexual**   * Rape * Sexual assault * Kissing * Fondling/caressing * Involving children in looking at, or in the production of, sexual images, watching sexual activities * Downloading child abuse images * Encouraging children to behave in sexually inappropriate ways * Sending sexualised texts and emails and transmitting sexually explicit images through social media * Grooming | * Bruises around the breasts or genital areas * Unexplained STI or genital infections * Unexplained vaginal or anal bleeding * Vaginal discharge or infection * Torn, stained or bloody underclothing * The child telling you they have been sexually assaulted or raped * Pain or itching in the genital area * Sexually transmitted disease * Stomach pains or discomfort when walking or sitting down * Pregnancy   Changes in behaviour which can also indicate sexual abuse include:   * Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn * Fear of being left with a specific person or group of people * Having nightmares * Running away from home * Sexual knowledge which is beyond their age, or developmental level * Sexual drawings or language * Bedwetting * Eating problems such as overeating or anorexia * Self-harm, suicidal thoughts, suicide attempts * Substance abuse * Suddenly having unexplained sources of money * Not allowed to have friends (particularly in adolescence) * Acting in a sexually explicit way, specifically children towards adults |
| **Emotional**   * Threats and verbal abuse * Humiliation * Blaming * Controlling * Pressurising and coercion * Intimidation and causing fear * Ignoring the person * Not giving the person a chance to express their views * Lack of love or affection * Making someone feel worthless * Lack of privacy or choice * Causing/forcing isolation/ withdrawal from family/friends and support networks. * Imposing developmentally inappropriate expectations e.g. interactions beyond the child’s developmental capability, overprotection, limitation of exploration and learning, preventing the child from participation in normal social interaction * Causing children to feel frightened or in danger e.g. witnessing domestic abuse, seeing or hearing the ill treatment of another | * Feelings of helplessness * Hesitation in talking openly * Implausible stories * Confusion or disorientation * Anger without an apparent cause * Sudden changes in behaviour * The person becoming emotionally upset or agitated * Unusual behaviour (sucking, biting or rocking) * Unexplained fear * Denial of a situation * The person becoming extremely withdrawn and non-communicative or nonresponsive * Telling you they are being verbally or emotionally abused   Changes in a child’s behaviour which can indicate emotional abuse include:   * Being unable to play * Fear of making mistakes * Sudden speech disorders * Self-harm * Fear of parent being approached regarding their behaviour * Developmental delay in terms of emotional progress |
| **Neglect** involves persistently failing to provide necessities, for example:   * Adequate food * Clothing * Shelter (including exclusion from home or abandonment) * Personal care * Failure to protect a child or vulnerable adult from physical or emotional harm or danger * Failure to ensure adequate supervision including the use of inadequate care-givers * Failure to ensure access to appropriate medical care or treatment * Deliberately withholding essential aids – for example visual or hearing aids * Denying social, religious or cultural contacts * Denying contact with family * Lack of appropriate supervision | * Dirt, faecal or urine smell, or other health and safety hazards in the vulnerable person’s living environment * Rashes, sores, lice on the vulnerable person * Inadequate clothing * Untreated medical condition * Poor personal hygiene * Over or under medication * Lack of assistance with eating or drinking * Unsanitary and unclean conditions * Constant hunger, this may sometimes lead to the person stealing food * Loss of weight, or being constantly underweight or obesity   Changes in behaviour which can also indicate neglect may include:   * Complaining of being tired all the time * Not requesting medical assistance and/or failing to attend appointments * Having few friends * Mentioning being left alone or unsupervised |
| **Grooming and CSE**   * Groomers may try to gain the trust of a whole family to allow them to be left alone with a child and if they work with children they may use similar tactics with their colleagues. * Groomers do this by: * Pretending to be someone they are not, for example saying they are the same age online * Offering advice or understanding * Buying gifts * Giving the child attention * Using their professional position or reputation * Taking them on trips, outings or holidays | The signs of grooming aren't always obvious, and groomers will often go to great lengths not to be identified. If a child is being groomed they may:   * Be very secretive, including about what they are doing online * Have older boyfriends or girlfriends * Inappropriate sexual or sexualised behaviour * Receiving unexplained gifts or gifts from unknown sources * Having multiple mobile phones and worrying about losing contact via mobile. * Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs) * Changes in the way the person dresses * Involved in abusive relationships, intimidated and fearful of certain people or situations * Unexplained changes in behaviour or personality – e.g. mood swings, volatile behaviour, emotional distress * Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders * Drug or alcohol misuse * Getting involved in crime * Injuries from physical assault, physical restraint, sexual assault * The adult may create special relationships with a particular person or have difficulties in keeping to boundaries. They may try to have secrets from others in the group.   In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. |
| **Spiritual**   * Mistreating a person in the name of God, faith or religion – the exact nature of the mistreatment may fall within the definition of one of the other abuse types. | * Special relationships, especially where there is an imbalance of power * Inappropriate or untrained exercise of exorcism and/or deliverance ministry * Misuse of authority e.g. by dictating exactly what a person should believe * Extreme pastoral interference in personal issues including how someone should express their faith * Telling someone that if they pray harder/believe more they will be healed * Making someone feel inferior in their faith |

# Appendix 2 Concern Reporting form



**Reporting a concern about a child or adult's safety and welfare**

Part 1 (for use by any Church Staff or Volunteers)

|  |  |
| --- | --- |
| Name of child/adult: | Date of Birth: |
| Date and Time of Incident: | Date and Time (of writing): |
| Your Name:  Print ……………………………………………………………..  Signature …………………………………………………………….  Contact number:  Role within the church: | |
| Record the following factually: What are you worried about? Who? What (if recording a verbal disclosure by a child / adult use their words)? Where? When (date and time of incident)? Any witnesses? | |
| What is the individual's account/perspective? | |
| Any other relevant information (distinguish between fact and opinion). Previous concerns etc. | |
| What needs to happen? Note actions, including names of anyone to whom your information was passed and when. | |
| Have you told the individual that you will be sharing your concerns with the Parish Safeguarding Officer  Yes / No | |

**Check to make sure your report is clear to someone else reading it.**

**Please email this form to the Julie Northcott - Parish Safeguarding Officer at** [**Safeguarding@trinitytewkesbury.org.uk**](mailto:Safeguarding@trinitytewkesbury.org.uk)

**Body Map Guidance**

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

\***At no time should an individual take photographic evidence of any injuries or marks to a child’s person, the body map below should be used. Any concerns should be reported and recorded without delay to the Parish Safeguarding Officer.**

**When you notice an injury to a child or adult, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:**

1. Exact site of injury on the body, e.g. upper outer arm/left cheek.
2. Size of injury - in appropriate centimetres or inches.
3. Approximate shape of injury, e.g. round/square or straight line.
4. Colour of injury - if more than one colour, say so.
5. Is the skin broken?
6. Is there any swelling at the site of the injury, or elsewhere?
7. Is there a scab/any blistering/any bleeding?
8. Is the injury clean or is there grit/fluff etc.?
9. Is mobility restricted as a result of the injury?
10. Does the site of the injury feel hot?
11. Does the child feel hot?
12. Does the child feel pain?
13. Has the child’s body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

**Ensure First Aid is provided where required and record**

A copy of the body map should be kept on the individuals concern/confidential file.

|  |
| --- |
| **BODYMAP** |

**(This must be completed at time of observation)**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Name of Individual: |  | | Date of Birth: | |  |
| Name of Staff / Volunteer: |  | | Role |  | |
| Date and time of observation: | |  | | | |

|  |  |
| --- | --- |
| BODY-1 | BODY-2 |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Name: |  | | Date and time of observation: |  |
| HEAD-1 | | HEAD-2 | | |
| FRONT | | BACK | | |
| HEAD-3 | | HEAD-4 | | |
| RIGHT | | LEFT | | |

|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Name of Individual: | |  | | | | | Date and time of observation: | | |  | | |
| HAND-1 | | | | | | HAND-2 | | | | | | | |
| R | | | | | | L | | | | | | | |
| BACK | | | | | | | | | | | | | |
| HAND-3 | | | | | | HAND-4 | | | | | | | |
|  | | | | | |  | | | | | | | |
|  | | | | | | | | | | | | | |
| Name of Individual: | |  | | | | | Date and time of observation: | | |  | | |
| FOOT-1 | | | | | FOOT-2 | | | | | | | |
| R | TOP | | | L | R | | | BOTTOM | | | | L |
|  | | | | | | | | | | | | |
| FOOT-3 | | | | | FOOT-4 | | | | | | | |
| R | | | | | L | | | | | | | |
| INNER | | | | | | | | | | | | |
| FOOT-5 | | | | | FOOT-6 | | | | | | | |
| R | | | | | L | | | | | | | |
| OUTER | | | | | | | | | | | | |
| Printed Name, Signature and role: | | |  | | | | | |  | |  | |

# Appendix 3 Parish Safeguarding Officer documentation



**INFORMATION/FRONT SHEET**

**To Be completed by the Parish Safeguarding Officer and held securely**

|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Full Name:  Gender: | | | DOB:  Ethnicity: | | | | Class/Form: | | | Additional needs: | | |
| Home Address: | | | | | | | Telephone:  E mail: | | | | | |
| Status of file and dates: | | | | | | | | | | | | |
| OPEN |  | |  | | |  | | |  | |  | |
| CLOSED |  | |  | | |  | | |  | |  | |
| TRANSFER |  | |  | | |  | | |  | |  | |
| Any other child protection records held already on this child / adult or family member?  YES/NO WHO? | | | | | | | | | | | | |
| Members of household | | | | | | | | | | | | |
| Name | Relationship | | | | DOB/Age | | | | Tel No | | |  |
|  |  | | | |  | | | |  | | |  |
|  |  | | | |  | | | |  | | |  |
|  |  | | | |  | | | |  | | |  |
|  |  | | | |  | | | |  | | |  |
|  |  | | | |  | | | |  | | |  |
| Significant Others (relatives, carers, friends, child minders, etc.) | | | | | | | | | | | | |
| Name | Relationship to child | | | | | | Address | | | | Tel No | |
|  |  | | | | | |  | | | |  | |
|  |  | | | | | |  | | | |  | |
|  |  | | | | | |  | | | |  | |
| Other Agency Involvement | | | | | | | | | | | | |
| Name of officer/person | | Role and Agency | | Status of Child i.e. CAF/CIN/CP/LAC | | | | Tel No | | | Date | |
|  | |  | |  | | | |  | | |  | |
|  | |  | |  | | | |  | | |  | |
|  | |  | |  | | | |  | | |  | |

**Chronology**

Sheet Number:

Complete for all incidents of concern including where a ‘logging the concern’ sheet has not been completed. If one has been completed then add a note to this chronology to cross reference (significant information may also be added).

|  |  |  |  |
| --- | --- | --- | --- |
| Name: | | | |
| DOB: | |  | |
| Date | Information/Details of concerns or contact | | Print Name and Signature |
|  |  | |  |

Part 2 **Logging a concern about a child or adult's safety and welfare**

(for use by PSO)

|  |  |
| --- | --- |
| Time and date information received, and from whom. |  |
| Any advice sought – if required (date, time, name, role, organisation and advice given). |  |
| Action taken (eg referral to children’s social care/monitoring advice given to appropriate staff/CAF etc.) with reasons.  Note time, date, names, who information shared with and when etc. |  |
| Parents informed? Y/N and reasons. |  |
| Outcome  Record names of individuals/agencies who have given information regarding outcome of any referral (if made). |  |
| Should a concern/ confidential file be commenced if there is not already one? Why? |  |
| Signed |  |
| Printed Name |  |

# Appendix 4 Diocese Guidance on Safe Environment and Activities

|  |
| --- |
| **Code of Safer Working Practice**  All those working on behalf of the parish with children, young people and adults  **Must:**   * Treat all individuals with respect and dignity. * Ensure that their own language, tone of voice, and body language is respectful. * Ensure that children, young people and adults know who they can talk to about a personal concern. * Record and report any concerns about a child, young person or adult and/or the behaviour of another worker with their activity leader and/or Parish Safeguarding Officer. Sign and date the record. * Obtain written consent for any photographs/videos to be taken, shown, displayed or stored (Model Consent Form to be linked shortly). * Administer any First Aid with others around.   In addition, for children and young people must:   * Always aim to work with or within sight of another adult. * Ensure another adult is informed if a child needs to be taken to the toilet. Toilet breaks should be organised for young children. * Respond warmly to a child who needs comforting but make sure there are other adults around. * Ensure that the child and parents are aware of any activity that requires physical contact and its nature before the activity takes place. |
| **Must not:**   * Invade an individual’s privacy whilst washing and toileting. * Use any form of physical punishment. * Be sexually suggestive about or to an individual. * Scapegoat, ridicule or reject an individual or group. * Permit abusive peer activities e.g. initiation ceremonies, ridiculing or bullying. * Show favoritism to any one individual or group. * Allow an individual to involve you in excessive attention seeking. * Allow unknown adults access to children, young people and adults that may be vulnerable. Visitors should always be accompanied by an approved person. * Allow strangers to give children, young people and adults who may be vulnerable in the group, lifts. * Befriend children, young people and adults who may be vulnerable on social media. * Take photographs on personal phones or cameras as this means that images are stored on personal devices.   In addition, for children and young people, must not:   * Give lifts to children you are supervising, on their own or your own (unless there are exceptional circumstances e.g. in an emergency for medical reasons or where parents fail to collect a child and no other arrangements can be made to take a child home. In such situations, the circumstances and your decision must be recorded and shared with an appropriate person at the earliest opportunity). * Smoke or drink alcohol in the presence of children and young people. * Arrange social occasions with children and young people (other than events which also include adult family members/carers) outside organised group occasions.   **Acceptable Touch**  Sympathetic attention, humour, encouragement and appropriate physical contact are needed by children and adults. Some physical contact with children, particularly younger children, is wholly appropriate. The following guidelines regarding touching are suggested:   * Always ask permission. * Be mindful of your body position. * Keep everything public. A hug in the context of a group is very different from a hug behind closed doors. * Touch should be in response to a child’s needs and not related to the worker’s needs. It should be age appropriate, welcome and generally initiated by the child, not the church officer. * Avoid any physical contact that is or could be construed as sexual and/or abusive/offensive. * Allow the child to determine the degree of physical contact with others except in exceptional circumstances (e.g. when they need medical attention).   In addition:   * You can allow people you support to give you brief hugs if you feel comfortable with this. * You can allow people you support to hold hands or link arms with you to help with travel and stability. * You should discourage people you support from touching your face. You can offer your hand instead. * You should discourage people you support from sitting on your lap. You can offer to sit side by side. * You should avoid using touch if the person you support is very distressed and is unlikely to tolerate it.   Ensure that church officers at all levels must take responsibility for monitoring one another in the area of physical contact. They should be encouraged to challenge one another if necessary. Concerns about possible abuse or inappropriate behaviour should always be reported.  **Children’s Activities**  Church groups that involve children need to ensure good practice standards across a wide range of areas including: recruitment of group leaders; DBS checking; staffing ratios; training; suitability of premises; health and safety arrangements; and facilities for children with special needs.  The minimum staffing levels for groups should be as follows   |  |  |  | | --- | --- | --- | | 0 – 2 years | 1 adult to 3 children | 1:3 | | 2 – 3 years | 1 adult to 4 children | 1:4 | | 4 – 8 years | 1 adult to 6 children | 1:6 | | 9 – 12 years | 1 adult to 8 children | 1:8 | | 13 – 18 years | 1 adult to 10 children | 1:10 | |

Each group should have at least two workers, even for smaller groups, and if possible one male and one female. Staff ratios for all groups should always be based on a risk assessment. For example, staffing numbers would need to be increased for outdoor activities and more so if that activity is considered higher risk, potentially dangerous or when children with disabilities or special needs are involved.

For all groups and activities:

* Undertake a health and safety risk assessment.
* A registration form must be completed for every child or young person who attends groups or activities which should include up to date information on parents’ contact numbers, medical information (e.g. allergies) and any special needs.
* An attendance register must be kept and be available at all group meetings.
* A First Aid kit must be available on any premises that are used by children.
* An accident and incident logbook must be available, and all accidents recorded. The logbook should be stored in a secure place. Any significant incidents must be recorded (e.g. a fight between children).
* There should be access to a telephone, if possible.
* In premises where children’s groups meet, the Childline and Family Lives telephone numbers should be displayed.
* Parents must sign a consent form before children are transported in a private car, and before any photography or images are taken.

In addition, when taking children offsite:

* The church leadership must be informed and agree to the activity.

• Details of the activity and any itinerary must be given in advance to parent/s and consent forms received in advance of the activity taking place.

* Details of the activity and a list of contacts must be left with someone in the church.
* Details of the activity and arrangements must be given to the incumbent and/or PSO.
* A risk assessment must be undertaken, and confirmation obtained that the activity is covered by PCC insurance.
* A leader must be designated to take responsibility for First Aid.

# Appendix 5 Designated persons 2023

**Parish Safeguarding Officers**

|  |  |  |
| --- | --- | --- |
| ***Role*** | ***Name*** | ***Contact Number*** |
| Lead for Safeguarding | Rev Stephen Walker (Vicar) | 01684 293233 |
| Parish Safeguarding Officer | Duncan de Gruchy | 07821 686527 |
| Safeguarding Officer for Adults | Liz Williams | 07450 141737 |

**Other Useful Numbers/Contacts:**

**Diocese Safeguarding Adviser**

Name Brett Richards

Contact Number: 01452 835516 (Office hours)

07944 680320 (Out of hours\*)

**\*Note** - Out of hours cover on weekends is provided by thirtyone:eight – 0303 003 1111

**Gloucestershire Children’s Safeguarding Board**

* Children’s Services Helpdesk Tel: 01452 426565, email: [childrenshelpdesk@gloucestershire.gov.uk](mailto:childrenshelpdesk@gloucestershire.gov.uk)
* Emergency Duty Team Tel: 01452 614194
* Community Social Workers and Early Help Teams:
* Cheltenham - 01452 328160
* Cotswold - 01452 328101
* Forest of Dean - 01452 328048
* Gloucester - 01452 328076
* Stroud - 01452 328130
* Tewkesbury - 01452 328251

# Appendix 6 – Policy Statement for Recruitment of Ex-Offenders

**Introduction**

The Church of England’s practice guidance on Safer Recruitment[[1]](#footnote-1) requires that all parishes have a written policy statement on the recruitment of ex-offenders.

The practice guidance states: *Applicants for paid and volunteer positions must be clear about how they will be treated if they are ex-offenders*. This means that each Parish/PCC needs to have a statement, with this in mind the following Policy Statement is provided to be used in the churches and parishes of the Diocese of Chelmsford. The policy below is taken from a sample statement issued by the Disclosure and Barring Service (DBS)[[2]](#footnote-2).

In the following Policy Statement, the term ‘we’ refers to Holy Trinity Tewkesbury PCC, deanery which formally adopts this statement.

Policy Statement

1. As an organisation assessing applicants’ suitability for positions which are included in the Rehabilitation of Offenders Act 1974[[3]](#footnote-3) (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), we comply fully with the code of practice4 and undertakes to treat all applicants for positions fairly
2. We undertake not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed
3. We can only ask an individual to provide details of convictions and cautions that we are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended)
4. We can only ask an individual about convictions and cautions that are not protected
5. We are committed to the fair treatment of staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background
6. This statement serves as our written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process
7. We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records
8. We select all candidates for interview based on their skills, qualifications and experience
9. An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position
10. We ensure that all those who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offence (see below regarding Responding to DBS Disclosures & Information)
11. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974
12. At interview, or in a separate discussion, we 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 withdrawal of an offer of employment
13. We make every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and can make a copy available on request
14. We undertake to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment

**Responding to DBS Disclosures & Information**

The Church of England’s practice guidance on Safer Recruitment8 states clearly that the Diocesan Safeguarding Adviser (in the Diocese of Chelmsford this means that contact must be made with the Safeguarding Team) must be informed when there are disclosures of cautions, convictions, reprimands or police intelligence in order to ensure that the relevance of the offences and associated risk are assessed.

4.4. The disclosure will be passed to the Diocesan Safeguarding Adviser for a risk assessment. The Diocesan Safeguarding Adviser is qualified to identify and assess the relevance and circumstances of offences and the risk. If the issues are complex he or she will ask for assistance from the Local Safeguarding Children or Adults Safeguarding Board. In very complex cases the advice of an independent specialist may be required. The Diocesan Safeguarding Adviser will make a recommendation concerning the suitability of the applicant to the person responsible for the appointment in line with the diocese’s local arrangements. Should the applicant not wish the confidential declaration and / or the criminal record disclosure to be seen, which is entirely his / her choice, the application must not proceed further and must be terminated.

**Additional Resources**

In May 2013, legislation came into force that allows certain old and minor cautions and convictions to no longer be subject to disclosure.

Employers are no longer able to take an individual’s old and minor cautions and convictions into account when making decisions. However, all cautions and convictions for specified serious violent and sexual offences, and other specified offences of relevance for posts concerned with safeguarding children and vulnerable adults, remain subject to disclosure.

In addition, all convictions resulting in a custodial sentence, whether or not suspended, remain subject to disclosure, as are all convictions where an individual has more than one conviction recorded.

Further guidance:

Information regarding the filtering of old and minor cautions and convictions which are now ‘protected’ and thus not subject to disclosure to employers.

<https://www.gov.uk/government/publications/filtering-rules-for-criminal-record-check-certificates/filtering-rules-for-dbs-certificates-criminal-record-checks>

How long do I have to disclose my criminal record for? Guide from Unlock <http://hub.unlock.org.uk/wp-content/uploads/ROA-Unlock-A5-8pp.pdf>

NACRO Resettlement Resources

[www.nacro.org.uk/resettlement-advice-service/](http://www.nacro.org.uk/resettlement-advice-service/)

1. Church of England Safer Recruitment Practice Guidance: <https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer_recruitment_practice_guidance_2016.pdf> (Section 2.3, July 2016) [↑](#footnote-ref-1)
2. DBS Sample Policy: [Sample policy on the recruitment of ex-offenders - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/dbs-sample-policy-on-the-recruitment-of-ex-offenders/sample-policy-on-the-recruitment-of-ex-offenders) [↑](#footnote-ref-2)
3. [↑](#footnote-ref-3)