

## Keeping safe

### Health and safety

#### General

For guidance on all general aspects of Health and Safety including:

- premises
- fire
- access to buildings
- first aid
- accidents

please follow the guidelines for churches and sample policies produced by the Ecclesiastical Insurance Group. These can be downloaded from their website, [www.ecclesiastical.com](http://www.ecclesiastical.com), or requested in hard copy by phoning 0345 777 3322 (Monday-Friday 8.00am-6.00pm), e-mailing [churches@ecclesiastical.com](mailto:churches@ecclesiastical.com) or writing to Church Department, Beaufort House, Brunswick Road, Gloucester GL1 1JZ.

#### Regular inspections

It is strongly recommended that when Churchwardens and others are undertaking annual health and safety and fire inspections of the premises, these inspections should also take account of health and safety issues which relate specifically to children and adults who may be vulnerable. In particular:

- electric sockets should be covered in rooms where young children regularly meet
- hazardous pieces of equipment (for example kettles) are positioned out of reach of vulnerable people, especially young children, and with no trailing leads
- there are no obstructions in passageways
- the first aid kit should be regularly inspected.

When activities are run specifically for children and adults who may be vulnerable:

- ensure the meeting place is warm, well lit and well ventilated, and kept clean and free of clutter
- electric sockets should be covered if young children are present
- toilets and hand basins should be easily available, and hygienic drying facilities should be provided
- there should be enough space available for the intended activity
- if food is regularly prepared on the premises, the facilities will need to be checked by the Environmental Health Officer and a Food Handling and Hygiene Certificate acquired
- children's packed lunches should be kept refrigerated. Drinks should always be available
- a register of attendance must be completed at every activity
- groups must have access to a telephone in order to call for help if necessary
- fire doors should be unlocked. Leaders should be aware of the fire procedures (see below)
- no smoking should be permitted by leaders when accompanying participants in the activities anywhere, on and off the premises
- alcohol and illegal drugs must not be used by those accompanying children and adults who may be vulnerable in their care or at a time that could affect their care
- unaccompanied children and young people should not walk to or from the premises along dark or badly lit paths
- a first aid kit and accident book should be available on the premises. All accidents or

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incidents must be recorded in the accident book, as soon as possible after the accident or incident occurs, but in any case before the premises are vacated following the activity

- it is strongly recommended that at least one of the leaders in a children's or youth or vulnerable adults' group has attended a recognised First Aid course
- for large events, St John's Ambulance or the equivalent should be in attendance
- out-of-sight places such as toilets should be regularly checked.

### What leaders should know about fire:

- what the sound of the fire alarm is
- where exits and emergency exits are located
- how to use any fire-fighting equipment
- how to take the register of people present with them
- where the assembly area is situated
- where the nearest telephone is
- the name and address of the premises
- who will meet the fire brigade when it arrives.

A practice of evacuating the premises with children, young people and vulnerable adults should take place twice a year and this should be recorded.

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***NB when evacuating premises in the event of a fire, or for a practice, when both children and their parents or carers are present but in different parts of the building (for example, during Sunday worship with Sunday School), it is the responsibility of leaders with the children to ensure that they evacuate the premises safely. Parents should evacuate the premises directly, and not collect their children on the way.***

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## Identifying and assessing risk

There is no such thing as a risk-free environment but if we set up our activities so that the dangers and hazards that we are aware of can be avoided, we will be minimising the risk for vulnerable people.

Our first concern is to protect the welfare of children, young people and adults who may be vulnerable. But in doing so, we are also protecting our workers (paid and volunteers), and protecting the reputation of the church.

A **risk assessment** is when you look carefully at what could be dangerous and possibly cause harm to children and adults who may be vulnerable, and see how this can be prevented. By identifying the danger you can look at what is already in place to prevent anyone coming to harm, and also look at what else could be done or put in place.

A **hazard** is anything or anyone that could cause harm, for example high stacks of chairs, uneven floors, unsafe electrical equipment, blocked fire exits, lack of fire escape signs, missing light bulbs, overfilled cupboards, high shelves, loose carpets, toxic paints, chemicals, horseplay, unknown workers (paid or volunteers), working in unsupervised situations, exposure to sun or cold weather conditions, lifts in cars, challenging behaviour, smoking and drinking.

A **risk** is the chance, great or small, that someone will be harmed by the hazard.

### When to do a risk assessment

It is recommended that for all new and existing parish activities where children and adults who may be vulnerable may be included – both one-off and regular – you carry out a risk assessment before it starts or happens, and then review it at regular intervals (at least annually) or when there is a significant change.

### Completing a risk assessment

- It is important to check the physical environment to make sure hazards are avoided. Walk round the building/venue looking out for things or situations that could reasonably be expected to cause harm. The actions necessary to ensure that this goal is achieved will vary according to the context and activity, so no single form or definitive list is provided. However, a blank template is provided at [Appendix 5, Section 10 of this manual](#) which can be adapted to suit the needs of each parish, and a worked example is shown overleaf for illustration.
- Ask other people – including vulnerable people – about what they think could cause harm.
- Identify who might be harmed/vulnerable:
  - young people
  - children or young people with special needs
  - children
  - adults who may be vulnerable, including people with mobility difficulties or sensory impairment as well as those with learning difficulties or mental ill health
  - visitors/parents/carers
  - leaders/organisers
  - members of the public.
- Identify what is being done and what else can be done to remove or reduce the risks.

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- Identify the outstanding actions and who is responsible for taking any further action.
- Revise and evaluate your risk assessment regularly – at least annually and before new or one-off activities.

### Worked example of Risk Assessment Form

**Activity:** Example – Youth Group Walking Pilgrimage

**Location:**

**Time/frequency:**

**Date of first assessment:**

**Name of leader with responsibility:**

What are the hazards?	Who might be harmed and how?	What are you doing already?	Do you need to do anything else to manage this risk?	Action by whom?	Action by when?	Done
<i>Loss of people during walking</i>	<i>Participants may become distressed or physically hurt</i>	<i>Regular head counts at agreed points  Allocation of named leaders to small groups  Exchange of mobile phone numbers between leaders</i>	<i>Ensure that young people have details of the group leader's mobile number and other key contact details and instructions on what to do if they become separated</i>	<i>Mrs X  Mr Y</i>	<i>...</i>	<i>Yes</i>

## Activities with children and young people

The National Safeguarding Team (NST) has produced a Model Code of Safer Working Practice with Children.

### You should:

- treat all children with respect and dignity
- ensure that your own language, tone of voice and body language is respectful
- always aim to work with or within sight of another adult
- ensure that another adult is informed if a child needs to be taken to the toilet. Toilet breaks should be organised for young children
- ensure that children know whom they can talk to if they need to speak to someone about a personal concern
- respond warmly to a child who needs comforting but make sure there are other adults around
- if any activity requires physical contact, ensure that the child and parents are aware of this and its nature beforehand
- administer any First Aid with others around
- obtain consent for any photographs/videos to be taken, shown or displayed (see [A Safe Church, Section 10, Appendix 10](#))
- record any incidents of concern and give the information to your group leader, sign and date the record (see *A Safe Church, Section 4, Record-keeping, data protection and information sharing*)
- always share concerns about a child and the behaviour of another worker with your group leader and/or Parish Safeguarding Officer (PSO).

### You should not:

- invade a child's privacy whilst washing and toileting
- use any form of physical punishment
- be sexually suggestive about or to a child even in fun
- scapegoat, ridicule or reject a child or group
- permit abusive peer activities, for example initiation ceremonies, ridiculing or bullying
- show favouritism to any one child or group
- allow a child to involve you in excessive attention-seeking that is overtly physical or behaviour that is sexual in nature
- give lifts to children you are supervising, on their own or your own unless there are exceptional circumstances, for example parents fail to collect a child and no other arrangements can be made to take a child home. In such cases, the circumstances and your decision must be recorded and shared with an appropriate person at the earliest opportunity
- smoke tobacco in the presence of children
- share sleeping accommodation with children
- arrange social occasions with children (other than events which also include adult family members/carers) outside organised group occasions
- allow unknown adults access to children. Visitors should always be accompanied by a known person
- allow strangers to give lifts to children in your group.

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The following guidelines should be read in conjunction with the [Model of Safer Working Practice](#):

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

### Leadership

- Always have at least two leaders, no matter how small the group. See *staffing levels*, below. Small groups with single leaders may meet in adjoining rooms with an open door between. If a child or young person is being interviewed alone, have another adult nearby.
- Try to ensure the leaders' genders reflect the group. In other words, endeavour to have at least one male leader if there are boys present, and at least one female leader if there are girls present.
- At least two leaders (preferably unrelated) need to be present from before the first child arrives until after the last child leaves.
- No person under the age of 18 should be left in charge of a group of children of any age.
- Young people aged 16 and 17 may help with groups but should be supervised by an adult leader, who is responsible for ensuring that good practice and the safeguarding children procedures are followed.
- Recruit all regular leaders of activities with children according to this manual's safer recruitment procedures (see [Section 5, Selecting, recruiting and supporting staff](#)), including taking up references and obtaining a Disclosure and Barring Service (DBS) enhanced disclosure.
- Parents or carers who are not regular leaders in the church can assist with occasional activities such as holiday workshops, but should always work in the company of two nominated and known leaders, and be responsible to an appointed leader.
- Ensure that all leaders are aware of the health and safety issues relating to the activity, including procedures for fire and first aid.
- Give regular leaders a copy of the relevant sections of the safeguarding children policy and procedures, and offer them support and training in their role.

### Staffing levels

These are the minimum required staffing levels for children's groups and are based on NSPCC guidance. This current guidance has slightly changed the ratio for children over four years old. More staff may be required if children are being taken out or undertaking physical activities and may also vary depending on:

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

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

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

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

**Administration for activities**

- The PSO must make and update annually a list of all paid staff and voluntary workers in the church who have regular, direct contact with children, and ensure that full recruitment procedures have been followed for each of them.
- Leaders must register every child or young person attending each specific activity with a form which includes their name, address, date of birth, contact number for their parent and carer and consent to the activity. Store the forms together in a confidential place, and always have them available for leaders of the activity throughout each session.
- Leaders must keep an attendance register for each activity of every child and leader in attendance at each session.
- There should always be a phone throughout each activity for emergencies; this may be a mobile phone.
- All confidential records about leaders, and confidential records relating to allegations of abuse against members of the congregation, and specific concerns about children or young people, must be securely stored with access limited to the PSO and the Incumbent.
- Record all accidents in the Accident Book, which should always be accessible on the premises.

**Running of activities**

- Ensure that children and young people are in sight of an adult leader at all times.
- Check areas of the building out of sight, for example toilets, regularly during sessions.
- Accompany young children to the toilet. Children and young people should have access to toilets without having to be in contact with other users of the premises.
- As a general principle, parents or carers of children under 11 are responsible for taking their children to, and collecting them from, an activity for which they have registered.
- Parents or carers must be clearly informed of the place and time of meeting and, if the meeting is off-site, when children will return.
- For children over 11, it is the parents' or carers' responsibility to make arrangements with their child for collection or travelling home independently.
- If a leader has concerns about the collection arrangements for a child over 11, they should address these directly with the parents or carers.
- In the event of a child not being collected as arranged, the parent or carer should be contacted by phone and asked to collect the child. If contact with the parent is not possible, two leaders should wait with the child until contact with parent or carer has been established. Only in exceptional circumstances should the child be escorted home. If a child

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appears to have been abandoned, statutory services must be contacted in consultation with the Diocesan Safeguarding Team (DST).

- Be clear about what behaviour is acceptable – and what is not – from children and young people.
- Be clear with parents and carers when there is an expectation that they remain responsible for the care and supervision of children during activities and restate this expectation on a regular basis.

### Programme of activities

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

### Taking children off the premises

- If children are to be taken off church premises for any reason, written permission should be obtained from parents or guardians. This permission may be granted for a given period of time; for example, a term.
- A named person at ‘home base’ for each activity should hold the registration details for all children, young people and leaders who are away from church premises, and be available by phone throughout the period of absence in case of emergencies. This person should have the itinerary and be aware of the plans, including estimated time of arrival at the destination, and estimated time of return.
- Leaders of the group should carry with them the registration and consent forms for all children in the group.
- Leaders should each carry mobile phones, and have readily accessible on their phone the contact details of other leaders of the group, and the named person at ‘home base’.
- A first aid kit should be carried.
- Parents should be informed if their children are to be transported by car or in another vehicle. Persons transporting children by car should be given a copy of *A Safe Church*, Section 4, *Transport – minibuses, coaches and cars*, and ensure they are complying with the requirements.
- If youth leaders arrange to meet young people in coffee shops and so on, a record should be kept of when the event occurred and in what circumstances.
- For residential trips, see *A Safe Church*, Section 4, *Holidays and residential trips*.

### Publicity of activities

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



### Unaccompanied children

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

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

### Use of home venues

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

- Rooms should be checked for physical hazards, and be hygienic.
- Bedrooms should not be used in any circumstances.
- Two adults (preferably unrelated) should be present from before the first child arrives until after the last one leaves.

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### Activities with adults who may be vulnerable

The NST has produced a Model Code of Safer Working Practice with Adults.

#### **You should:**

- treat all adults with respect and dignity
- ensure that your own language, tone of voice and body language is respectful
- always share any concerns
- record any incidents of concern and give the information to your group leader and/or PSO, sign and date the record.

#### **You should not:**

- invade an adult's privacy while supporting them
- use any form of physical punishment or restraint
- be sexually suggestive about or to an adult even in fun
- scapegoat, ridicule or reject an adult or group
- permit abusive peer activities, for example initiation ceremonies, ridiculing or bullying
- show favouritism to any one adult or group
- allow an adult to involve you in excessive attention-seeking that is overtly physical or sexual in nature
- allow unknown adults access to adults deemed at risk of harm. Visitors should always be accompanied by a known person
- allow strangers to give adults in your group lifts.

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

### Active membership and inclusion

- Create an environment where all people, including those who are vulnerable, are encouraged to participate in and contribute to all aspects of church life.

### Respect

- Always respect the adult who may be vulnerable and all his or her abilities.
- Ask about personal preferences, forms of address and how much help might be needed.
- Ensure his or her individuality; for example, always use their name.
- Give the same respect as to others.
- Respect differences; for example, in appearance, ideas, personalities and ability.

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- Don't assume or withhold physical contact – ask first.
- Have a proper conversation using appropriate language; for example, ask about interests.

**Choices**

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

**Language and visual resources**

- Always use positive language when referring to disability, age and mental health.
- Consult with individual vulnerable adults to identify their specific needs.
- Use proper sign language for deaf people and those with learning disabilities, as appropriate.
- Install a loop system.
- Have available service books and sheets in large print.
- Use suitable font size and colours on all printed material.
- Ensure that everyone has access to presentations and so on by offering a clear 'sight line'.
- Make information on noticeboards accessible – take into account height, words and images and size.

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

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

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### Leadership of activities

- For specific activities or groups for vulnerable adults, always ensure that there are at least two people in a leadership role.
- All regular leaders of activities with vulnerable adults should be recruited according to this manual's safer recruitment procedures (see [Section 5, \*Selecting, recruiting and supporting staff\*](#)), including taking up references and obtaining any required DBS checks.

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

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

### Needs of carers

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

## Physical contact

Churches aim to provide a warm, nurturing environment for children and adults who may be vulnerable.

### Physical contact

We can all find physical contact potentially difficult, and we each have different boundaries of personal space, which may depend on our background, personality, experiences and cultural or ethnic norms.

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

The following points regarding touch are offered as suggestions to follow:

- be sensitive and sympathetic to the needs and wishes of the individual, and try to respond in a way which is neither patronising nor rejecting
- keep everything public. A hug in the context of a group is very different from a hug behind closed doors
- touch should be related to the child's or adult's needs, not the leader's or carer's, nor determined by an existing culture of physical touch between church members
- touch should be age-appropriate and generally initiated by the child or vulnerable adult
- avoid all physical activity that is, or may be thought to be, sexually stimulating to the child or the vulnerable adult
- children and vulnerable adults have the right to decide how much physical contact they have with others, except in exceptional circumstances where they may need medical attention.

### Restraint

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

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

### Children or adults in distress

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

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### Intimate and personal care

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

As a general principle, however, adults should avoid any physical contact when children or adults who may be vulnerable are in a state of undress, avoid any visually intrusive behaviour and, where there are changing rooms, announce their intention of entering. Generally, leaders should not change in the same place as children, shower or bathe with children, or assist with any personal care task which the child or adult who may be vulnerable can undertake by themselves or for which the adult would usually have a personal carer.

### Relationships of trust

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

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

### Some specific dos and don'ts for paid staff and volunteers

Do	Don't
Wherever possible work with or within sight of another adult.	Inflict physical punishment of any kind, nor any sanction which may ridicule or humiliate a child or adult.
For activities such as bell-ringing, which require specific physical contact, make sure the person and their parents/carer are aware of this and its nature.	Engage in rough physical games including horse-play, or in sexually provocative games.
Only use restraint to prevent a child or adult from harming him/herself or others, or doing significant damage to property.	Make sexually suggestive comments about or to a child or adult, even in fun.
Administer first aid with others around.	Allow children or adults to use inappropriate language unchallenged.
If young children need comforting, ensure they are responded to warmly but with other adults around, while respecting the need for privacy.	Let complaints or allegations made by a child or adult be ignored or go unrecorded.
When taking young children or adults to the toilet, make sure another adult is informed, or organise a toilet break for the whole group.	Do things of a personal nature for children or adults that they can do themselves.

## First Aid and administration of medication

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

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

Where First Aid is required, wherever possible adults should ensure that another adult is aware of the action being taken. Parents and carers should always be informed when First Aid has been administered.

If the injury appears to be serious, the emergency services should be called without delay. If First Aid in an emergency needs to be administered by untrained staff, they should act reasonably and do the minimum necessary to preserve life and limit the consequences of injury until qualified assistance is obtained. There is a risk that a leader undertaking First Aid could face an allegation of negligence if an injury worsened, but this is a remote risk provided the leader has acted reasonably in a genuine attempt to assist in an emergency.

Parents or carers should be contacted promptly in the event of an accident to a child or young person or vulnerable adult. In the case of a slight injury, the parent or carer should be told when the child or vulnerable adult is collected, or informed soon after the activity.

Leaders should have available contact details for the Accident and Emergency Department of the local hospital, and any other out-of-hours emergency services.

### Administering medication

No medicines should be given without the prior permission of the parents or carers. In circumstances where children or vulnerable adults need medication regularly, details should be established as soon as possible, in order to ensure the safety and protection both of the child or adult who may be vulnerable and of the adults who are working with them. Details should be included on parishes' registration and consent forms (see [A Safe Church, Section 10, Appendices 6 and 7](#) for sample registration and consent forms for children and vulnerable adults).

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

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### Holidays and residential trips

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

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

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

All leaders must be recruited according to the recruitment procedures laid out in this manual (see [Section 5, \*Selecting, recruiting and supporting staff\*](#)).

#### Communication

- All leaders should carry a mobile phone, and have the phone numbers of other leaders saved on their phone.
- A list of details of all children, young people or vulnerable adults present on the trip, including emergency contact details for parents or carers, should be carried by a leader at all times.
- A copy of this list should be held by a designated person at home, who will act as the intermediary in the event of emergency communication between the group and the church, and with parents and carers.
- Leaders must report all serious incidents to the designated person at home, who will in turn pass on appropriate information.

#### Support of leaders

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

#### Premises

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

#### Risk assessment

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



## Transport

See *A Safe Church*, Section 4, *Transport – minibuses, coaches and cars*.

## Holidays and residential trips with children and young people

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

### Information to parents

- It is important that parents should have full information before giving consent. This should include:
  - aims and objectives of the trip and activities
  - date of the trip and its duration
  - details of venue, including arrangements for accommodation and supervision
  - travel arrangements
  - name of group leader and contact numbers
  - information about financial, medical and insurance arrangements.

### Parental consent

- Each child or young person under the age of 18 (unless they are over 16 and living away from home or married) must have the written consent of parent or guardian, which gives authority to the person named as responsible for the activity to take the young person away and to act ‘as a careful parent would’. It does not transfer ‘parental responsibility’.

### Accommodation

- For all residential trips:
  - boys and girls must have separate sleeping and washing facilities which are private to them
  - mixed groups must have adults of both genders involved
  - adults should have separate accommodation but in close proximity to the young people
  - young people under the age of 18 must not be left alone overnight
  - there should be a rota of awake adults during the night at least until all the young people have settled down.
- Any other arrangements, for example ‘sleep-overs’, ‘lock-ins’ or ‘all-night’ events, should be carefully explained to parents beforehand and their consent sought to the arrangements.

### Supervision

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

## Section 4: Keeping safe

### Sleeping on church premises

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

### Risks of fire when on church premises:

- Great care must be taken to ensure the safety of the young people from the risk of fire.
  - There should be two separate routes out from the sleeping accommodation.
  - It must be possible to open all external doors. They should not be locked.
  - All exit routes should be clearly marked.
  - All internal doors should be kept closed at night to prevent the spread of smoke or fire.
  - Portable heaters should be placed in safe positions and turned off at night.
  - All adults should have access to a torch and a telephone.
  - There should be no smoking anywhere on the premises.
  - A list of those present should be hung up near the main exit door. Everyone should know where outside to assemble for a roll call to be completed.
  - Anyone discovering a fire should raise the alarm by shouting “fire”.
  - The Fire Service should be called to all fires. Use the 999 facility.
  - Make sure that cars do not block the exits or access for emergency vehicles.
  - Adults should know where to locate fire-fighting equipment and how it is operated. This equipment should only be used if safe to do so.

## 9. Holidays and residential trips with vulnerable adults

### Consent and involvement

- The vulnerable adult should be informed about:
  - the aims and objectives of the trip and activities
  - the date of the trip and its duration
  - the details of venue including arrangements for accommodation and supervision
  - travel arrangements
  - the name of the group leader and contact numbers
  - information about financial, medical and insurance arrangements.
- The vulnerable adult should be fully involved in planning and decision-making for the residential trip. If the vulnerable adult is not able to voice their opinion, advocates, such as family members or friends, should be consulted as their representatives.

### Leadership

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

**Accommodation and arrangements**

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

**Health and behavioural needs**

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

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### Childcare provision on your premises: Ofsted registration

#### What is Ofsted?

Ofsted (Office for Standards in Education, Children's Services and Skills) is responsible for registering and inspecting Early Years and childcare settings for children aged seven and younger.

Churches who provide childcare on their premises are classed as 'childcare providers on non-domestic premises', and may be required to register.

As a general rule, registration with Ofsted is required if a paid childcare provision is provided for children aged seven and younger for more than two hours a day.

There are, though, various exemptions such as temporary childcare provision.

For further information:

- <https://www.gov.uk/government/organisations/ofsted>
- e-mail: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)
- general enquiries: 0300 123 1231, Monday to Friday, 8.00am-6.00pm
- contact your local authority.

## Transport – minibuses, coaches and cars

Transport arrangements to or from church activities are the responsibility of parents or carers or individual adults if they make arrangements among themselves. They are the responsibility of the PCC if the PCC organises them. Transport or travel between church activities will usually be the responsibility of the PCC.

This procedure applies to PCC-approved drivers for PCC-organised transport for children, young people, or wholly or mainly for adults who are vulnerable.

### Responsibility of organisers

- Those organising outings requiring the use of private cars or minibuses are responsible for ensuring that drivers are aware of this procedure.
- Approved drivers must be recruited according to the safer recruitment procedures laid out in this manual (see [Section 5, Selecting, recruiting and supporting staff](#)). This includes the requirement for a satisfactory Disclosure and Barring Service (DBS) disclosure.
- To ensure that this procedure is adhered to, you are advised to obtain from those people who are recruited to transport children or adults who may be vulnerable in their cars or drive minibuses:
  - a signed undertaking, covering the issues below
  - sight of their driving licence and their insurance certificate.

### All transport

#### Consent

- Children and young people should not be taken out in transport without the prior consent of their parents or carers.
- Adults who may be vulnerable should give permission to being transported themselves, and discretion used in consulting first with their carers (see [A Safe Church, Section 10, Appendix 9](#)).
- Care should be taken when assisting children or adults who may be vulnerable to board and alight vehicles, both to ensure that the road is safe to do so and in following the guidelines on physical contact.

#### The driver

- All those who drive children or adults who may be vulnerable on church organised activities should be over 25 and should have held a full current driving licence for more than two years.
- Any driver who has an endorsement of six points or more on their licence should inform the PSO.
- Any driver who has an ‘unspent’ conviction for a serious driving offence, including a drink-driving offence, driving under the influence of drugs, dangerous driving, causing death by dangerous driving, manslaughter or culpable homicide while driving a vehicle and causing serious injury by dangerous driving should not transport children or adults who may be vulnerable.

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### Transport in private cars

#### Seat belts in cars

- Only cars fitted with seat belts (both front and rear) may be used, and the numbers of people transported should not exceed the number of seat belts available.
- All car passengers are required to wear safety belts in the front and rear seats.
- All children up to three years old must be carried in a child restraint.
- Rear-facing baby seats must not be used in a seat protected by a front air-bag unless the air-bag has been deactivated manually or automatically.
- Children from the age of three up to 135cm in height (approx 4ft 5in) or their 12th birthday (whichever they reach first) must use child seats, or booster cushions for older children. After this they must use an adult seat belt.

#### The vehicle/insurance

- All cars that carry children or adults who may be vulnerable should be comprehensively insured. The insured person should make sure that their insurance covers the giving of lifts during church activities. It is the responsibility of car owners to check that their vehicle is insured for the transportation of children or adults who may be vulnerable. While the transportation of passengers without reward (in other words for petrol money only) would normally be covered under 'social/domestic use', vehicle owners **must** check with their insurers. Additional cover can very often be included for a small extra charge.
- All cars that carry children or adults who may be vulnerable should be clean and in a roadworthy condition.
- At no time should the number of people in a car exceed the number of seat belts in the car.

#### Escorts

- Another responsible adult should accompany the driver, to assist with any emergencies.
- If in an emergency a driver has to transport one child or vulnerable adult on his or her own, the child or vulnerable adult must sit in the back of the car.

### Minibuses, buses and coaches

#### Seat belts in minibuses, buses and coaches

- Legislation regarding seat belts in minibuses, buses and coaches is more complicated and depends upon the age and size of the vehicle.
- However, even though on some occasions it may not be a legal requirement to wear a seat belt in the rear of a minibus or larger vehicle, it is strongly recommended that only minibuses with fitted seat belts (both front and rear) may be used for church-related activities, and all children and adults should use the seat belts or, where relevant, child or booster seats. The church has a responsibility to carry children and adults in their care safely and it would be difficult to justify that this is the case for vehicles without seat belts.

#### Permit to drive

- When using a minibus, whether owned, hired or borrowed, all drivers must hold the correct permit on their driving licence or take the appropriate driving test.
- Drivers with entitlement to drive cars prior to 1 January 1997 (shown as group A, B for automatics on an old-style licence or as category B and D1 not for hire or reward on a new-style licence) can drive a minibus provided they are over 21 and under 70, the minibus has a maximum of 17 seats including the driver's, and is not being used for hire or reward.
- This minibus entitlement remains valid in the UK and on temporary visits abroad until the

## Section 4: Keeping safe

licence is next renewed. When this happens, the minibus entitlement can only be issued by making a special application which involves meeting higher medical standards. Minibus entitlement is normally renewed for three years.

- If minibus entitlement is not renewed, or the car licence was obtained after 1 January 1997, the driver may drive a minibus with a maximum of 16 passenger seats provided that:
  - it is driven on behalf of a non-commercial body for social purposes but not for hire or reward
  - the driver is aged over 21 and under 70 years
  - the driver has held a car licence (category B) for at least two years
  - the driver is providing his/her service on a voluntary basis
  - the minibus maximum weight is not more than 3.5 tonnes excluding any specialist equipment for the carriage of disabled passengers.
- When driving a minibus under these conditions, no payment must be received other than out-of-pocket expenses; no trailer can be towed; and minibuses may only be driven in the UK.
- Drivers aged 70 or over will need to make a special application which involves meeting higher medical standards.
- Regular drivers of minibuses should be encouraged to take a MiDAS (Minibus Driver Awareness Scheme) test, organised by the Community Transport Association UK (CTA) which promotes a nationally recognised standard for the assessment and training of minibus drivers. It is a membership-based scheme that has been designed to enhance minibus driving standards and promote the safer operation of minibuses. Further information is obtainable from <https://www.midas-training.org.uk/introduction-to-midas.php>.

### Escorts

- There must be another responsible adult travelling as escort in the rear of the vehicle, in most cases sitting next to the door.
- The adult should be responsible for ensuring a reasonable standard of behaviour, and particularly that children's or vulnerable adults' seat belts remain fastened.
- The adult should also supervise boarding and alighting.

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### Safeguarding arrangements for bell-ringing

The Central Council of Church Ringers has produced a general statement on safeguarding children in towers. It highlights the principal requirements and good practice of safeguarding in the context of church bell-ringing. The full statement can be found at <https://ccabr.org.uk/>. The following is a summary of the principles and is extended to include vulnerable adults.

If the bell-ringing team contains children/young people or vulnerable adults, it will be necessary to formulate a safeguarding policy for the group based on the guidance here which has been taken from the Central Council of Church Ringers' policy.

The safer recruitment procedures laid out in this manual (see [Section 5, \*Selecting, recruiting and supporting staff\*](#)) must be adhered to. DBS disclosures will be required for:

- Tower Captains
- Deputy or Vice Captain or Assistant Tower Captains
- Ringing Masters
- adult ringers who train or teach children or are designated to supervise the welfare of children
- adults who transport children or vulnerable adults as a formal arrangement.

All of the above must undertake Diocesan safeguarding training in line with Diocesan expectations.

Activities/roles not eligible for a DBS check:

- ringers in general supporting roles
- unplanned one-off teaching or deputising in an emergency (on one occasion only)
- transporting children/vulnerable adults as part of arrangements between families.

The Tower Captain has the overall responsibility for the operation and monitoring of the safeguarding policy and procedures.

#### **Guidelines for maintaining a safer environment for children and vulnerable adults in the belfry**

- Parents' consent in writing should be sought prior to commencing teaching, outings or Guild meeting visits and they should be made aware, in advance, of the content and arrangements for teaching, outings or visits. Any medical conditions of the child should be established in advance as should the agreement that the parents are responsible for delivering and collecting the child/vulnerable adult. It is good practice to invite the parents to a training session so they understand what is involved in learning to ring.
- If there is a child or adult who it is believed is at immediate risk of harm call the emergency services on 999 and then inform the PSO or Diocesan Safeguarding Adviser (DSA). Any behaviour of adult ringers which gives cause for concern should be discussed with the PSO or DSA who will advise about any further action.
- Keep an attendance register, which all attendees must sign, so that everyone is aware who was present at any given time.
- Children and vulnerable adults must be supervised at all times and should only be allowed into hazardous locations, such as the bell chamber, when accompanied by the Tower Captain/Deputy or Assistant.
- Always have two adults (preferably one of each gender) present whenever children/young people are ringing or being supervised, taught or transported.



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- Touching should be only that appropriate for teaching, supervision and/or in an emergency. Those helping children or vulnerable adults by ringing another bell or standing nearby should be aware of the need to protect personal space.
- Relevant health and safety procedures should be followed and First Aid available.
- Local tower arrangements should always be approved by the PCC in line with the parish safeguarding policy. The Tower Captain should have a copy of the policy and ensure that ringers have access to it.
- Ensure that the appropriate insurance is in place prior to any teaching, training or ringing session.

**Recommended additional best practice safeguards**

- All local ringing societies should appoint a Safeguarding Officer, someone who can oversee the performance of safeguarding matters in their area.
- Good liaison should be established between Tower Captains and PCCs and between the Safeguarding Officer of local societies and the PSO and DSA.
- Please note that it is the responsibility of all visiting groups to ensure that those leading/supervising a group have had all relevant checks and it is not the responsibility of the host church, unless the host church is providing the leader/supervisor for a visiting group. All visiting groups should have a copy of the general statement on safeguarding children in towers available to them.

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### Safe communication online and through social media with children and young people and adults who may be vulnerable

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

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

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

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

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

Online technology continues to advance and methods of communication change in popularity over time. The majority of young people and even young children now own a type of mobile phone known as a smartphone which is in essence a small mobile computer which has access to the internet and many applications such as e-mails, texts, Facebook messenger, Snapchat, WhatsApp and Instagram.

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

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

None of us, of whatever age, is immune from encountering problems online. Young people are 'online veterans' compared to most adults but they almost certainly don't have the life experience and wisdom to handle all of the situations they encounter.

For all of the benefits of social media, unfortunately they carry potential safeguarding risks and challenges.

- The person is not present so that neither party can use facial expressions or body language to clarify meaning.

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- The apparent anonymity of communication can lead to a false sense of security about what you say and what images you send.
- Similarly the instantaneous nature of communication via social media can encourage users to reveal information/images which they would not normally pass on to others.
- Posting personal information can potentially identify and locate a child offline.
- Online communication cannot be deleted and may be there forever. This could in some circumstances cause significant problems for the young person later in life.
- Grooming – those who wish to abuse young people or vulnerable adults often start with online interaction and then attempt to entice the young people/vulnerable adults into an unprotected face-to-face meeting. This can lead to unwanted contact, exploitation and abuse.
- Those who wish to abuse can easily pretend to be somebody they are not and gain the trust of young people or vulnerable adults. This includes pretending to be a similarly aged young person or someone of a different gender to become their ‘friend’. This can be convincing, with assumed identities etc.
- This can lead to a risk of online abuse, for example persuading young people or vulnerable adults to take part in sexual activity online.
- It can feel like there is no escape from online abuse. Abusers can contact their victims at any time of the day or night, the abuse can come into safe places such as the victims’ bedrooms, and images and videos can be stored and shared with other people or the threat made that this will happen.
- There is the potential for inappropriate relationships between adults in positions of trust and the young people they should be caring for.
- Social media communication can occur 24 hours a day and often late into the evening when adults – and indeed young people – could be under the influence of substances leading to a lack of inhibition and weakened barriers to inappropriate behaviour.
- It is very easy to slip from public communication to private communication.
- If it is private, others are not present to provide guidance.
- Young people and adults who may be vulnerable can be exposed to inappropriate content, including extreme pornography, racist or hate material or violent behaviour.
- There is a risk of online bullying, known as cyberbullying. This is defined as using the internet, e-mail, online games or any digital technology to threaten, tease, upset or humiliate someone else. This can have serious consequences to the victim’s mental well-being. Unfortunately, young people who wouldn’t in the ‘real world’ think of bullying others can become cyberbullies, especially when encouraged by others. The harm caused to the other person may not be as visible to the cyberbully using social media as it would be if they were face to face so the normal inhibitors may not be in place.
- Cyberbullying can be extreme, such as encouraging young people to self-harm or even take their own lives, or pressuring them to send sexual images or engage in sexual conversations which can then be distributed.
- Cyberbullying includes ‘trolling’ which is the sending of menacing or upsetting messages on social networks, and via chat rooms and online games.
- There can even be financial or legal consequences such as giving out a parent’s credit card number or doing something that violates another person’s rights.

**Guidelines for leaders in communicating electronically**

- Maintain good and open relationships with parents and carers regarding communication with them and their children.
- If young people want you to have their mobile phone numbers, e-mail addresses or similar,

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and communicate with them this way, make sure that their parents know and have agreed in writing.

- Only make contact with young people for reasons related to the work of the church and never just to engage in conversation.
- If a young person misinterprets such communication and tries to engage an adult in conversation, the adult must end the conversation or stop replying; suggest discussing the subject further at the next activity which should be in the presence of another adult and, if concerned about the young person's communication, discuss the matter with the PSO.
- Electronic communication should not be the default way of communicating. Face-to-face communication should be used wherever possible, normally at or around the time of a scheduled activity.
- Communication should take place only at reasonable times of the day and never late at night.
- Where possible communicate with a group not an individual.
- Establish a dedicated group with at least two authorised adult users.
- Use the highest appropriate level of security setting and restrict membership to the intended group.
- Where young people are on a rota or in another multi-contact scenario, distribution groups should be set up to ensure that individual contact details are not shared.
- Set personal profiles on any social networking site to the highest form of security to avoid access to personal information.
- Do not use a personal account to communicate.
- Ensure that the particular form of social media employed is age-appropriate.
- Only give personal contact details to young people that are within the public domain of the church, including your mobile telephone number.
- Where possible another adult should be copied into all communication with young people or adults who may be vulnerable. This should be an overt copy rather than a blind copy.
- Where possible use only equipment provided by the church to communicate with children (such as the vicarage or parish office phone, or a mobile phone purchased specifically for the work).
- Never 'friend' or 'follow' children or young people on social media.
- Communicate clearly, don't abbreviate or short-cut communications and obviously never use inappropriate language.
- Use an appropriate tone: friendly, but not over-familiar or personal.
- Be aware that boundaries of relationships can become blurred on social media.
- Be warm and friendly, but do not suggest or offer a special relationship.
- Be careful how you sign off: consider, for instance, how 'love' and 'XXX' might be perceived and misinterpreted by the young person and never sign off in this way. Use the name you would expect them to call you in person.
- Avoid the use of emojis or other symbols. Photographs and videos of young people must not be posted on social media without the consent of their parent/carer and this must be in writing on the consent form (see [A Safe Church, Section 10, Appendix 10](#)). Encourage the parent/carer to discuss this with their child before giving their consent.
- Be clear and explicit about information that you need to share; don't abbreviate or short-cut your communications.
- Make sure that communication would not cause embarrassment if it were seen by the young person's parents or church officials.
- Do not share any personal information with a young person, or request or respond to any

personal information from the young person, other than that which might be appropriate as part of your role.

- Be circumspect in your communications with young people to avoid any possible misinterpretation of your motives or any behaviour which could be construed as grooming.
- Respect the young person's confidentiality unless abuse is suspected or disclosed.
- Recognise that text messaging is rarely an appropriate response to a young person in a crisis situation or at risk of harm.
- Store e-mail, texts and other messages for as long as possible. If a message contains anything which causes concern, print it out and/or retain on file/hard drive.
- It is advisable to have an agreed supervisor of any group accounts. The young people should be made aware who this is. This should be documented and consider notifying the PSO so they can keep a record.

### Inappropriate content

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

### Criminal offences

Some experts believe that legislation across the UK has struggled to keep up with the rapid developments in online technology and that old laws are often being stretched to fit new online offending behaviour.

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

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

### Sexting

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

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- Sexting may also be called:
  - 'trading nudes'
  - 'dirties'
  - 'pic for pic'
  - 'underwear shots'.

### What the law says about sexting

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

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

A young person is breaking the law if they:

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

The following sequence of events is an example.

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

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

- However, even if an offence has technically been committed, the police guidance from 2016 is that sexting by children will primarily be considered as a safeguarding issue. If the matter is reported to the police, then by law they need to record the incident on their crime system but they can decide not to take further action against the young person if it is not in the public interest. This has become known as 'Outcome 21'.
- Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they are a risk.

### Why do young people sext?

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

- Joining in because they think that everyone is doing it.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.

- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent.
- It may involve something more serious such as grooming, harassment, blackmail or exploitation.

### What are the risks of sexting?

An obvious risk is that the young person could be committing a criminal offence, which, even if the police decide not to take any action, could lead to a distressing and stressful process for the young person and those around them.

It is easy to send a photo but the sender then has no control about how it is passed on.

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

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

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

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

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

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people involved. This should take into account proportionality as well as the welfare and protection of the young people.

- Parents/carers should be informed and involved at an early stage unless informing the parent may put the young person at risk of harm.
- A decision not to inform parents/carers must be made in conjunction with other services such as the local authority and/or the police.
- Where appropriate the young person should be involved in deciding the best approach to inform their parents.
- Be aware of the emotional distress and pressure young people may be suffering following the discovery of an incident of sexting and offer reassurance and support and consider providing the young person with helpline phone numbers such as ChildLine and the NSPCC (see [A Safe Church, Section 9](#) for contact details).

Becoming aware of a case of sexting can lead to complex and difficult issues and it is important to recognise this and seek professional guidance.

### Use of shared computers and technology

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

### Use of social networking sites

Personal social networking accounts and profiles should not be used for work with vulnerable groups – create a separate church group page related to your church role and for communications with



young people and vulnerable adults. Ensure that young people and their carers are aware of who is responsible for content. Be cautious about accepting friend requests from church members and do not accept them from children and young people.

### Safety tips for young people

- **THINK BEFORE YOU POST** about what you are thinking, feeling or doing. Even though you can delete something (a post, picture, comment etc), you cannot permanently erase something which has appeared online. Once you press send, it is no longer private.
- If you wouldn't want your teachers or parents to see it, it's probably best not to post it. Remember – once it's posted, it is out of your control.
- When online and using social media, never give out any personal information about yourself, your family or anyone else, for example mobile or other phone numbers, address, school or place of work.
- Never send a photo to someone you do not know and trust in the real world. The wrong kind of image can give the wrong impression.
- Never share sexual images of yourself or others online. Once you have sent it you can't control what happens to it and you may be committing a criminal offence – see *Sexting*, pages 4-30 to 4-32.
- Log into chat rooms using a nickname and be careful what you disclose about yourself in your personal profile.
- Chat safely – you can never be sure who you are dealing with. Remember: they could be deceiving you.
- Never arrange a real-world meeting with someone you only know through the internet. Even if you get on with them online, you cannot be sure who they really are.
- Don't pretend to be someone or something you are not in a way that might hurt someone else's feelings or cause them upset.
- Don't post anything which is abusive or offensive. You could be committing a criminal offence but also causing someone distress. Don't message someone online with anything that you wouldn't say if you were with them face to face or wouldn't want to be said to you.
- Always password protect your accounts and check your privacy settings. Use complex passwords that are hard for others to guess and use a mix of letters and numbers. Change them regularly.
- If something happens in an online chat room or on any social networking site that makes you feel uncomfortable, leave the site. Tell an adult you trust, and if you can, keep a copy of what it was that upset you.
- If you end up on a website or social networking site with material which you find upsetting or offensive, leave the site and again inform a trusted adult.
- If you are not using your webcam, unplug it or cover the lens or point it at a blank wall.
- If you are being bullied online, report or block the person. Do not reply to nasty, abusive or threatening messages. Do not be forced into sending personal or embarrassing information or photos. Talk to an adult you trust.
- If you see someone being bullied online, let the person know you are there for them. Don't share, comment on or 'like' nasty posts or videos – even when being supportive this can lead to more people seeing it. If you are worried about someone's safety, speak to an adult you trust or to a helpline such as ChildLine.

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

#### Introduction

The taking and publishing of photographs and videos is usually enjoyed by children and parents, and by adults who may be vulnerable, and can bring good publicity, but steps need to be taken to ensure that privacy is respected and no embarrassment is caused.

The issues are the same for still photographs or films, and regardless of the particular technology used. They also apply to audio clips from individuals. For convenience they are all referred to as images.

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

#### Guidelines

##### General

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

##### Consent

- Except in the above circumstances, consent should be obtained before taking and using images, and a chance to opt out must be given.
- Consent need not be in writing if it is not proposed to publish the images in any way; but if they are going to be displayed, used in a newspaper or magazine (including the Diocesan or parish newspaper or magazine), or put on a website or used in social media then specific written consent should be obtained. A template consent form for using photographs of children and young people, and a template consent form for using photographs of vulnerable adults are both available in [A Safe Church, Section 10, Appendices 10 and 11](#).
- Images should only be used for the specific purpose agreed by the person photographed. Written consent must specify what purposes the image will be used for, and how it will be stored if not destroyed. If the intention is to use an image on the internet, this must be clearly stated at the time that consent is sought. Further written consent is required if images are to be used in ways other than originally specified.
- For children, written consent must be obtained from parents or guardians.
- For young people, written consent must be obtained from parents or guardians and the young people themselves.
- For vulnerable adults, images should only be used for a purpose which is explained to them, and to which they give their recorded and preferably signed informed consent; in other

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words, they understand and agree. They should see the photograph before being asked to give consent. The person who obtains the consent should sign and give their relationship to the person photographed, and the name and address of the organisation for which they work or volunteer.

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

### Publication and use of images

#### For children:

- As a general guideline, if the image is to be published, avoid naming the child; and if a child is named, avoid using his or her image. However, there may be circumstances where, with the explicit, written consent of the child and his or her parent or guardian, it is permissible to use the child's full name, for instance when promoting a specific performance or achievement.
- If children are not fully dressed, for example, for swimming, then:
  - focus on the activity rather than a particular child
  - avoid full face and body shots
  - consider the age of the children involved.

#### For adults who may be vulnerable:

- Specific consent should be sought for images of adults where it is the intention to name the person in the image in an accompanying caption or article.
- All images must respect the dignity of the person being photographed.

### Storage of images

- Be clear about whether the image is to be retained for further use.
- Store the image securely.
- Ideally, store consent forms with the image for future reference.

### Images taken by participants

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

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

#### Purpose

The aim should be to provide workers with a clear practical framework to enable them to work with young people in a positive, drug-free environment.

#### General principles

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

#### Incident recording

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

#### Confidentiality

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

#### Working with police

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

#### Contact with parents

- In cases of immediate risk to the health of the child or young person, the parents will be contacted and also emergency medical services if required.
- If the worker believes parental contact would exacerbate the situation (for example, the family home may be an important factor in the young person's drug use) he/she must discuss the situation with the PSO prior to any contact being made.

#### Use of alcohol

The PCC needs to adapt its procedures for the use of alcohol according to the kind of event or activity which is being organised. For example, an event where there are many adults, and most

young people are with their parents, needs different arrangements from a residential stay, where a group of young people is supervised by youth leaders.

#### **Legal requirements**

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

#### **Good practice**

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

### **Use of drugs**

#### **Good practice**

- Any necessary medication, whether prescribed or off the shelf from a pharmacy, should be noted on the parental consent form.
- Use of illegal drugs on the premises or on organised trips is never permitted.
- If a young person is suspected of carrying drugs, they may be asked to turn out their pockets, but personal searches are not appropriate. Instead, the police should be contacted.
- Illegal drugs will be confiscated and either disposed of immediately or passed to the police. Two staff members should be involved. Details should be recorded in the incident book.
- In dealing with drug-related situations, establish and be clear about the nature of the incident before deciding on any course of action.

#### **Finding drugs**

- If workers find any drugs, including prescribed medication, in a communal area these will be removed, to limit the risk to others.
- The law allows youth workers to confiscate illegal drugs, but they must be destroyed

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immediately or handed to the police (it is not a legal requirement to inform the police from whom the substance was taken).

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

### Disposal of illegal drugs

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

### Use of illegal drugs on premises

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

### Smoking tobacco

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

### Good practice

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

### Hirers of premises

- Establish whether or not alcohol is to be sold at the event. If it is, the hirer is responsible for applying for a temporary event notice, which should be seen by a PCC representative before the event.
- Consider whether conditions need to be imposed on the involvement of young people in the event, and incorporate appropriate conditions in hire agreements (see [A Safe Church, Section 10, Appendix 12](#) for a sample safeguarding provision form to be attached to any agreement on hiring church premises).

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

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

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

### What always constitutes unacceptable behaviour?

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

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

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

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

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

### What precautions can you take?

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

- Don't allow anyone who you think may pose a risk into your home or any environment where you are alone.
- Keep doors locked if you are in church alone or in a small group but let people know why and how they can exit the building.
- Always aim to have at least two adults present.
- Always have access to a phone.
- Have readily available contact details for emergency services.
- Do regular risk assessments of activities.
- Set ground rules for belonging/joining activities or groups – and stick to them.
- If challenging behaviour becomes part of a group's culture, leaders should meet to plan how to address it.
- When challenging behaviour arises, leaders should meet to debrief after the meeting, in

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order to learn from mistakes, make a record, and decide what needs to be done and how leaders will be supported.

- For vulnerable people you know, develop contact with carers and support agencies, and take advice on how to handle their behaviour.
- Gain an understanding of particular disabilities or mental health issues in order to understand the behaviour better.
- Learn how best to communicate with adults with specific vulnerabilities.
- Refer to health or care agencies if you are concerned about someone's behaviour.
- If the behaviour of a vulnerable adult is known to be erratic or challenging, work out with them, and in association with their primary carer, an agreement on how their behaviour will be managed and what sanctions applied if necessary.
- If you have received threats of violence or intimidating behaviour, inform the local police and ensure you have a plan for how you will respond if an incident occurs.
- Inform and take advice from the DST.

### Working with disruptive children

If a child or young person is being disruptive:

- ask him or her to stop
- speak to the child to establish the cause(s) of upset
- inform the child that he/she will be asked to leave if the behaviour continues
- consider at every stage calling the child's parent or carer
- warn the child that if he/she continues to be disruptive, this may result in longer-term exclusion from the group or activity
- where possible, have a team strategy for handling disruption, such as engaging leaders of other groups taking place at the same time in management of situations.

If a child is harming him/herself, another person or property, then:

- escort other children away from the area where the disruption is occurring
- at the same time, another worker should ask the child to stop
- if the request is ignored, warn him/her that you may call for additional help (such as the police) if they do not stop
- if they do not stop, call the police or other appropriate professional help
- in exceptional circumstances, you may need to restrain the child to prevent them harming themselves, others or the property whilst you wait for the police
- ensure that the parent/carer of both the child and any other child affected by the disruption (especially a victim) are informed of the incident as soon as possible after it has taken place
- record the event as soon as possible after the incident, and inform someone outside the situation, preferably the Incumbent or PSO
- after the incident, consider what longer-term sanctions are appropriate regarding this child, and what safeguarding steps are needed regarding others in the group. If necessary, take advice from the DSA.

### Guidelines on managing violence and aggression

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



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

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

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

**Do:**

- always treat the person with respect
- name yourself (if the person doesn't know your name)
- address the person by name
- speak loudly enough to be heard by the individual concerned but not necessarily by everyone else in the room
- try to manoeuvre into a place of safety: move slowly away from stairs and glass windows to somewhere with an exit, where the person won't feel cornered or trapped, and where there are other people around who are aware of what is happening
- stand more than an arm's length away from the person, partly so that they can't grab hold of you but also so you aren't invading their personal space (a characteristic of aggressive behaviour is invasion of another person's personal space so keeping your distance also protects your own space)
- avoid physical contact
- stand at an angle, not face to face, thereby reducing eye contact
- keep yourself calm by taking a few deep breaths to slow your heart rate
- be aware that the person has feelings they are trying to express and that they may be frightened by the situation they have created and not know how to get out of it
- make a record of the event afterwards and discuss what has happened with others to see if a future recurrence can be prevented.

**Don't**

- try to deal with the situation alone
- shut the door
- threaten with any sort of weapon
- use physical contact
- push into a corner
- invade personal space
- shout

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- point or clench your fist
- outstare
- move suddenly or threateningly
- let your feelings, or anyone else's, override good practice and common sense.

## Record-keeping, data protection and information sharing

### Opening a church safeguarding case file

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

The record should include ongoing actions with dates, other key documents on the case file (for example, observation notes, reports, consent forms etc) and the case closure date.

Records should use straightforward language and be concise and accurate so that they can be understood by anyone not familiar with the case. They should clearly differentiate between facts, opinion, judgements and hypothesis.

Safeguarding records are needed in order to:

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

### Who should record

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

### How to record

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

- A written record of the event or conversation should be made as soon as practicable after the event or conversation but always within 24 hours. If brief notes are made at the time and then written up in detail later, again this should be as soon as practicable. The original notes must not be destroyed.
- Record the names of all key people including any actual/potential witnesses and include contact details.
- Keep your recording factual and an accurate account of what you have observed and what has been disclosed.
- When recording what potential victims/witnesses/alleged perpetrators have said to you or within your hearing use exact quotes where possible, and make this clear using quotation marks.
- When recording the circumstances of the concern or event, add the explanations offered by the people involved and make it clear who has given you that information.
- Record all your actions and decisions – for instance, with whom information was shared, from whom you took advice and any other action you took. If in doubt, record it.
- Record the date and time of all events, in other words when the concern arose and was made known to you or when you observed the concern or allegation, and all subsequent actions and decisions, including to whom and when you passed on the concern. Always sign each entry if a hard copy or make clear on an electrical record who has made that entry.

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- Record who knows about the information – for instance, the subject, their parents or carers, and other church leaders.
- Record what should happen next, for example what action will follow and who is going to do what. If there is subsequent action to take, make a note of the date by when this should happen in a diary.
- Include the views/perspective of the victim or vulnerable child or adult.
- If the person about whom you have made a record is unaware of the record's existence, make it clear in your recording why you have not told them.
- If it is necessary to record professional judgements and opinion, it must be clear that this is not fact and should be distinguished as such.
- All records must be respectful to the subjects and always bear in mind that they may be read by the subjects who have a right of access to their files.

### Record retention and security

The safeguarding case files, whether electronic or paper, must be stored securely by the Incumbent and PSO. This should include identifying who should have access to them. Records in relation to safeguarding issues, even if they have not been proven, should be maintained in accordance with the church's retention guidance (*see How long should records be kept?*, below). If the Incumbent moves from the church, the records should be passed to the new Incumbent.

In addition:

- no case work material should be stored on home computers or in home offices
- keep paper records in chronological order, and in a secure folder or file
- keep all electronic recorded information in password-protected or encrypted documents, with sole access to the author
- electronic files should be regularly backed up and systems virus protected. Data must not be stored on external drives or removable media unless encrypted or password protected
- safeguarding records should only be seen by those who need to have proper access to them
- sending information via e-mail is quick and easy but is open to the risk that someone other than the intended recipient can intercept it. Assume that it could be read by anyone. This will help to ensure that you take appropriate care both in the content of the e-mail and any attachments. Take care to check the address you are sending it to
- e-mails containing safeguarding personal information should ideally be in an approved encrypted format, but if this is not available e-mail file attachments should always be protected by a password-protected method
- no letter containing confidential information and identifying details should be sent other than by special delivery. Always use the double envelope safeguard: the relevant information should be contained within an inner envelope marked confidential but no classification details shown on the outer envelope.

### How long should records be kept?

[A safeguarding records retention fact sheet is available via the Church of England website.](#) The fact sheet gives guidelines for the retention of safeguarding records in response to the Independent Inquiry into Child Sexual Abuse.

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

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*Please note that whilst the Independent Inquiry into Child Sexual Abuse is ongoing, all records that relate to safeguarding should be retained.*

<b>Case work and allegations/ concerns/risk assessments</b>	<b>Record-keeping</b>	<b>Retention</b>
Records of child or adult protection incidents or concerns within a parish/ Diocese/cathedral etc or family where the church either reports concerns or is involved in supporting and monitoring a child, adults or families. This includes risk assessments and ‘agreements’.	It is essential that a record should be kept of any safeguarding allegations and concerns and how these are handled – how the information was followed up; actions taken; decisions reached and eventual outcomes.	Seventy years after last contact with the individual concerned.
Records that relate to safeguarding concerns/ allegations about church officers (paid or unpaid, excluding clergy), including details of how these are handled, followed up, actions taken, decisions reached and eventual outcome.	It is essential that a record should be kept of any safeguarding allegations and concerns, and how these are handled – how the information was followed up; actions taken; decisions reached and eventual outcomes.	Seventy-five years after employment ceases.
<b>Children and young people’s activities</b>	<b>Record-keeping</b>	<b>Retention</b>
Records of any children’s activities, Sunday school/junior church/youth club/choirs and related safety risk assessment.		Fifty years after the activity ceases.
<b>Employment</b>	<b>Record-keeping</b>	<b>Retention</b>
Clergy personal records where there are safeguarding allegations and investigations regardless of the findings.	See guidance from the House of Bishops dated May 2018 ( <a href="http://bit.ly/ClergyPersonalRecords">http://bit.ly/ClergyPersonalRecords</a> )	Current guidance states 50 years from the date of the cleric’s death. In the light of recent non-current abuse cases, longer retention periods may be advised.
Personnel records relating to lay workers who do not work with children and vulnerable adults.		Six years after employment ceases.

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Employment	Record-keeping	Retention
<p>Personnel records relating to lay workers whose role involves contact with children and vulnerable adults including applications, references, disciplinary matters, job descriptions, training and termination documentation.</p> <p>It should include all documentation concerning allegations, investigations and risk assessments regardless of the findings.</p>		<p>Seventy-five years after employment ceases.</p>
<p>DBS disclosures obtained as part of a vetting and/or employment process.</p>	<p>A DBS certificate is not allowed to be retained for longer than six months. It is permissible to keep a record of the date of the check; the name of the person; the type of certificate requested and its reference number; the position for which the certificate was requested; and the actions taken. If such records are stored on a central register a cross reference must be held on the file of the individual concerned.</p>	<p>Six months after DBS certificate issued.</p>
<p>Record of a cleric's criminal record check history.</p>	<p>See guidance from the House of Bishops dated May 2018 (<a href="http://bit.ly/ClergyPersonalRecords">http://bit.ly/ClergyPersonalRecords</a>)</p>	<p>Fifty years from the date of the cleric's death.</p>
<p>Evidence of clergy personal file being independently scrutinised under the Past Cases Review Protocol, including a note of any action resulting.</p>	<p>See guidance from the House of Bishops dated May 2018 (<a href="http://bit.ly/ClergyPersonalRecords">http://bit.ly/ClergyPersonalRecords</a>)</p>	<p>Fifty years from the date of the cleric's death.</p>
<p>Record of Clergy Current Status Letters.</p>	<p>See guidance from the House of Bishops dated May 2018 (<a href="http://bit.ly/ClergyPersonalRecords">http://bit.ly/ClergyPersonalRecords</a>)</p>	<p>Fifty years from the date of the cleric's death.</p>

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Description – Discipline	Record-keeping	Retention
Record of Clergy Discipline Measure complaint including copies of the complaint, report on preliminary scrutiny, respondent’s answer, supporting evidence, letter recording Bishop’s decision.	See guidance from the House of Bishops dated May 2018 ( <a href="http://bit.ly/ClergyPersonalRecords">http://bit.ly/ClergyPersonalRecords</a> )	Current guidance states 20 years from date of cleric’s death. In light of recent non-current abuse cases, longer retention periods may be advised.

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

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

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

**Data protection and information sharing**

In May 2018, the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 replaced the Data Protection Act 1998. The GDPR contains the principles governing the use of personal data. It should be noted that the GDPR and the Data Protection Act 2018 place greater significance on organisations being accountable and transparent in relation to their use of personal data. Parishes handling personal data need to have the proper arrangements for collecting, storing and sharing information.<sup>1</sup>

Personal information in relation to safeguarding will often be sensitive and is likely to be classed as what is called ‘special categories of personal data’ under the GDPR, which means extra care will need to be taken when handling such data. Nevertheless, it is important to be aware that the Data Protection Act 2018 includes specific reference to processing data in relation to the ‘safeguarding of children and individuals at risk’ and allows individuals to share, in certain situations, personal data without consent (see below).<sup>2</sup> “The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe” and this can equally be said to apply to vulnerable adults.<sup>3</sup>

<sup>1</sup>More information for parishes about the new data protection regime can be found at <https://www.parishresources.org.uk/gdpr>

<sup>2</sup>There are also provisions that allow the sharing of personal data without consent for the prevention or detection of unlawful acts or to protect members of the public from dishonesty, malpractice or seriously improper conduct. However, you should always seek legal advice before relying on these provisions.

<sup>3</sup>*Information sharing – advice for practitioners providing safeguarding services to children, young people, parents and carers’ (July 2018)*

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### Sharing without consent

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

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

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



## Insurance

All churches need to follow the requirements of their own insurance company with regard to safeguarding policy and practice. Ecclesiastical advises the Church of England and the Diocese with regard to insurance.

The groups concerned with this document will be insured through a number of different companies whose policies will be subject to various terms, conditions and exceptions. However, the majority of PCCs, parish groups, and so on will be insured with Ecclesiastical, which has a website at [www.ecclesiastical.com](http://www.ecclesiastical.com) that includes sections on:

- people on church premises
- community outreach activities
- safeguarding.

Where parishes are insured with another company, the position of that company should be clarified, including confirmation of the scope of cover.

Policies of insurance require the insured to take all reasonable steps to prevent injury, loss or damage occurring. Failure to take such precautions may prejudice the insurance arrangements in force. A duty therefore exists upon the insured to research and adopt best practice based upon current and ongoing guidelines.

It is also a condition of a policy of insurance that the insurer is notified **immediately** of any incident or allegation. Failure to comply with this requirement may prejudice any cover provided by the policy.

Public liability insurance indemnity limits should be kept under regular review. Guidance is available from the relevant insurer.

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***To ensure you are adopting best practice, we recommend that you follow the Church of England's current and ongoing guidelines in safeguarding, on which the Diocese of Southwark's policies and procedures in safeguarding children and adults who may be vulnerable are based.***

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### The PCC's responsibilities

The starting point for insuring your group(s) is with the PCC and their existing parish insurance (usually the Parishguard policy). This covers work organised under the auspices and control of the PCC anywhere in the British Isles. However, for a group to be working 'under the auspices and control' of the PCC, the following should apply:

- the PCC must specifically accept responsibility for the activities of the group, and minute such in its records in detail
- the PCC must have full details of any proposed new activities, so as to decide whether to accept responsibility for these activities, and this must also be minuted
- the PCC must select all leaders and maintain records of these appointments.

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In reality, this may mean the PCC discusses and agrees general activities for a particular group on an annual basis, and then is only required to be consulted should the group wish to go outside the agreed parameters, or should new leaders be recruited.

The nature of the cover provided is for public liability for the PCC as the insured. Such cover will normally be sufficient for regular church activities with a standard format (for example, choir, confirmation classes, servers, bell-ringers, Bible studies and so on).

It is important that the PCC knows what other activities their insurance covers: take special care whenever you go out on a trip. Check the insurance of the place you are going to; most will be covered. If in doubt about a local activity, ring your parish insurance company. Usually you will be covered, but if you are planning something different (such as a holiday or outdoor pursuits), you will almost certainly need extra cover.

Further information can be obtained from Ecclesiastical:

Telephone: 0345 777 3322

E-mail: [churches@ecclesiastical.com](mailto:churches@ecclesiastical.com)

Website: [www.ecclesiastical.com](http://www.ecclesiastical.com)

Church Department, Beaufort House, Brunswick Road, Gloucester, GL1 1JZ.

Alternatively, contact your own insurer.

## Hirers of church buildings

### Who does this apply to?

This section applies to all activities and events which take place in church buildings or grounds which are not run directly by the PCC, and where the PCC has a formal or informal hiring agreement with the organisers. Regular bookings and one-off bookings are included, as are all kinds of lease, and all kinds of arrangements for payment – commercial rents, subsidised rents, or those who pay no rent at all.

Examples of activities included are children's parties, Scouts and Guides, wedding receptions and sharing agreements with independent churches. Examples of activities not included are Sunday Schools, church-run youth clubs and parish social events.

It applies to all events and activities which may include children and adults who may be vulnerable (for instance parties), as well as those which are specifically set up for children and vulnerable adults.

### Insurance requirements: 'reasonable steps'/best practice

#### For all bookings

- You need to ensure that you are complying with the requirements of your insurance company. Ecclesiastical Insurance's Public Liability (Third Party) insurance protects policyholders, as long as you use 'best practice' procedures in the management of child and adult protection and care.
- The observance of 'reasonable care' is a standard insurance condition.
- The hiring body is required to ensure that children and adults who may be vulnerable are protected at all times, by taking all reasonable steps to prevent injury, illness, loss or damage occurring, and carries full liability insurance for this.
- You have a duty to adopt 'best practice' based upon current and ongoing guidelines.
- In any booking of church premises for which the PCC is responsible – both one-off bookings and regular bookings – you should include a clause which says words to the effect of:  
"You are required to ensure that:
  - children and adults who may be vulnerable are protected at all times, by taking all reasonable steps to prevent injury, illness, loss or damage occurring
  - you carry full liability insurance for this."

#### If a private hirer has no insurance cover

- Ecclesiastical has added an extension to its Parishguard policy on page 60, 'Indemnity to private hirers' (downloadable from Ecclesiastical's website, [www.ecclesiastical.com](http://www.ecclesiastical.com)). This provides a contingency insurance, should a private hirer not have their own insurance, when organising a private social event at the church or hall.
- Parishes should check equivalent provisions with their own insurers if other than Ecclesiastical.
- Normally this public liability insurance would be provided by an individual's own home insurance. However, this is not always provided automatically, and in some cases policies cannot be extended to include it.
- It is still a good idea for the church to ask if liability insurance is in force. If not, then the church can make the decision, for one-off events, as to whether it would be happy for this to be provided by its own Parishguard policy.

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- If the extension has a number of exclusions, and if the activity is part of a regular group activity, then it would normally be sensible for the group to have cover in its own right.

### Accidents and incidents

- In addition to the provision for making good any loss or damage to the building and contents, the agreement should draw the attention of hirers to the fact that they are primarily liable for any accident or injury which arises out of their activities whilst using the premises. An accident book should be located on the premises, and hirers are required to complete details of any accident or incident occurring during their occupation of the premises which did or could give rise to injury. Details should be completed as soon as possible after the accident or incident, but in any case before the premises are vacated by the hirers after the event.

### Use of alcohol

- Establish whether or not alcohol is to be sold at the event. If it is, the hirer is responsible for applying for a temporary event notice, which should be seen by a PCC representative before the event. You should consider whether conditions need to be imposed on the involvement of young people in the event, and incorporate appropriate conditions in hire agreements.

### For one-off bookings

- You should give the responsible person booking the premises sight of your parish's safeguarding policy and guidelines for activities, and ask him/her to sign a statement which confirms that he/she has seen these and agrees to abide by them.
- For one-off bookings, you do not need to expect the hirers to obtain DBS checks for leaders.
- If it should come to your notice that they have contravened your policy, you then have the right to cancel the booking and/or refuse future bookings by that person.

### For regular bookings

- You need to ensure that your safeguarding policies and procedures are being practised, but the responsibility for implementing them rests with the hiring organisation and not with you. However, you need to take reasonable steps to ensure that this is being done.
- Before you make the booking:
  - check whether this group intends to care for children where an Ofsted registration is required. No booking with such a group should be formalised until you have seen evidence of its Ofsted registration, if required. It is the hirer's responsibility to register with Ofsted, but they may need to work with the PCC in order to address any premises requirements raised by Ofsted.
  - give them a copy of your safeguarding policy and the procedures relevant to their event or activity, and ensure that they can comply with the guidelines for running activities for children and/or adults who may be vulnerable.
  - ensure that the hirer has arrangements in place for all eligible leaders to be appropriately DBS checked.

### As part of the hiring agreement

- Ensure the hirer completes the Form for Regular Hirers of Church Premises (see [A Safe Church, Section 10, Appendix 12](#)), which can be incorporated into your standard lease or

agreement. This gives you the right to ask for evidence from the organisation/individual of their implementation of your procedures.

#### **Monitoring the hiring agreement**

- You must ensure that groups are updating their information at least annually, for instance when you renew your letting, or invoice them for rent.
- With groups or individuals who are not part of national organisations (such as Scouts, Guides or play groups, who have very well developed procedures of their own consistent with Diocesan procedures), we recommend that you check from time to time that they are abiding by your policies and procedures in the way they are carrying out their activities.
- If you are informed of allegations or concerns in the context of groups or individuals who hire your premises, you must follow the Diocesan procedures for responding, working in partnership with the group's own procedures.

For health and safety advice regarding church premises, please consult with the Ecclesiastical Insurance Group.