



Safeguarding Policy, Procedures and Guidance

for the Methodist Church in Britain



Completion date	Type of review	Approved by	Next review date
December 2022	Full policy review	Safeguarding Committee	July 2023

Context of Changes

The wholesale review of the policy in its entirety was required following a number of policy changes along with internal changes to Methodist Church policy in amendments made in 2021. The implementation of the District Safeguarding Group standards and criteria in addition to changes in the Sexual Offences Act 2003 (England and Wales) to include religious leaders in positions of trust necessitated this review.

Moreover, the inclusion of the Anti-Bullying and Domestic Abuse policies in the Church's overall safeguarding policies meant that the time was right to remove historical references to ensure the current policy position is clear for all.

Contents	
SECTION 1 – Introduction	6
1.1 Status of Policy, Procedure and Guidance.....	6
1.2 Foundations.....	6
1.3 Societal Context and Legal Framework.....	6
1.4 Learning from Past Cases Review.....	9
1.5 Ecumenical context.....	11
SECTION 2 – Safeguarding Policy Statement	12
2.1 Safeguarding in the Methodist Church.....	12
2.2 Commitments.....	12
2.2.1 Promote a safer environment and culture.....	13
2.2.2 Putting the policy into action.....	13
2.3 Definitions of abuse and neglect.....	14
2.3.1 Child-on-child abuse and contextual safeguarding.....	14
2.3.2 Child and Adolescent-to-Parent Violence (APV).....	15
SECTION 3 – Safer Working Practices with Children, Young People and Vulnerable Adults	16
3.1 Code of Safe Working Practices with Children.....	16
3.1.1 Appropriate conduct.....	
3.1.2 Appropriate dress.....	18
3.1.3 Receiving gifts.....	18
3.2 Code of Safer Working Practices with Adults.....	18
3.2.1 Appropriate conduct.....	18
3.2.2 Visiting adults at home.....	19
SECTION 4 – Responding well to Safeguarding Incidents	20
4.1 Responding well.....	20
4.1.1 Listening to those who raise concerns.....	21
4.1.2 Low-Level Concerns	22
4.1.3 Emergency situations	23
4.1.4 Assessment of risk.....	23
4.1.5 Referring to statutory agencies.....	24
4.2 Recording.....	31
4.3 Caring for those who have suffered abuse.....	32
4.4 Principles and procedures for providing support.....	33
4.4.1 Helping recovery and responding well.....	34
4.4.2 Disagreement.....	35

4.4.3 Caring for the congregation.....	35
4.5 Additional actions.....	36
4.5.1 Suspension of ministers, probationers, students or lay office holders	36
4.5.2 Notifying the Connexional Media and Communications Team.....	37
4.5.3 Duty to refer to the Disclosure and Barring Service	37
4.6 Responding well to allegations of historical child sexual abuse.....	38
4.7 Responding well to those who might pose a risk.....	38
4.7.1 Making contact with police or probation services.....	40
SECTION 5 – Safeguarding Organisational Structure and Responsibilities	41
5.1 Local church/circuit level	41
5.2 District level.....	42
5.3 Connexional Level: Director of Safeguarding and the Safeguarding Team.....	43
5.3.1 Diagram - Safeguarding Structure of the Methodist Church.....	45
5.4 Responsibilities of Charity Trustees.....	45
5.5 Training requirements.....	46
5.6 Church schools.....	47
5.7 Methodist Homes.....	48
SECTION 6 – PRACTICE GUIDANCE	49
6.1 Definitions of Key Terms when Safeguarding Children.....	49
6.1.1 Definitions of abuse.....	49
6.1.2 Possible indicators of abuse – children.....	52
6.2 Definitions of Key Terms when Safeguarding Adults.....	54
6.2.1 Safeguarding definitions.....	54
6.2.2 Definitions of abuse.....	55
6.2.3 Possible indicators of abuse in adults.....	58
6.3 The Care Act (2014) and Statutory Guidance	60
6.3.1 Safeguarding definitions.....	61
6.4 Additional guidelines	61
6.5 Activity risk assessments	61
6.6 Hire or use of Methodist Church premises	62
6.7 Activities in a private dwelling	62
6.8 Safeguarding children and young people online	62
6.8.1 Digital images and use of photographs/recordings online	63
SECTION 7 – INFORMATION SHARING	65
7.1 The Seven Golden Rules of Information Sharing.....	65

7.1.1 Confidentiality	66
7.1.2 Pastoral conversations and confidentiality	66
APPENDICES	67
APPENDIX 1 Anti-Bullying Policy.....	68
APPENDIX 2 Safer Working Practices When Managing Children’s Activities.....	71
APPENDIX 3 Notifying External Organisations.....	76
APPENDIX 4 Procedures for the Management of Safeguarding Information.....	77
APPENDIX 5 Preparing for a Safeguarding Contract.....	89
APPENDIX 6a Model Church Safeguarding Policy... ..	102
APPENDIX 6b Model Circuit Safeguarding Policy... ..	108
APPENDIX 6c Model District Safeguarding Policy... ..	112
APPENDIX 7a Role Descriptor Church Safeguarding Officer	115
APPENDIX 7b Role Descriptor Circuit Safeguarding Officer	116
APPENDIX 8 District Safeguarding Group.....	118
APPENDIX 9 Safeguarding Training Attendance List.....	122
APPENDIX 10 External Users’ Safeguarding Policy Declaration Agreement.....	126
APPENDIX 11 Information Sharing Agreement Template.....	128
APPENDIX 12 Responding to Police Requests for Information.....	133
APPENDIX 13 Safeguarding Guidance for Local Ecumenical Partnerships (LEPs)	139

SECTION 1 - Introduction

1.1 Status of Policy, Procedure and Guidance

This document sets out the policy, procedures and guidance relating to safeguarding within the Methodist Church. The provisions outlined are informed by current legislation and accepted good practice from within the Church, statutory agencies and other community organisations with safeguarding responsibilities.

Sections designated as policy and procedure are mandatory while those clearly identified as 'guidance' are regarded as good practice. Therefore, it is highly advisable, although not compulsory, to adhere to these guidelines.

The policy, procedures and guidance in this document have been reviewed and agreed by the Methodist Church Safeguarding Committee on behalf of the Church's trustees, under their responsibilities designated in standing order 232 (2) v of the Constitutional Practice and Discipline of the Methodist Church. Amendments which correspond to changes required to the Church's governance provisions are approved by the Methodist Council, in addition to the Safeguarding Committee and will be reviewed by the Law and Policy Committee.

The Methodist Church Safeguarding Policy, Procedures and Guidance are reviewed on an ongoing basis by the Connexional Safeguarding Team. Changes and amendments will be considered by the Safeguarding Committee on an annual basis, as a minimum requirement.

1.2 Foundations

In developing and implementing this policy, the Methodist Church is guided by the following foundations:

- the Gospel
- human rights, international and national law.

The Church fully supports the personal dignity and rights of all children, young people and adults, as enshrined in the Human Rights Act 1998 and the 1989 United Nations Convention on the Rights of the Child.

It recognises that safeguarding work is undertaken within a British legislative and associated government guidance framework, which sets out a range of safeguarding duties and responsibilities.

1.3 Societal Context and Legal Framework




Widespread coverage in the media of the failure of various organisations and individuals to adequately prevent, and protect children from, abuse – including the high profile cases of Jimmy Savile and the Rotherham Report, has led to a growing understanding of the importance of


recognising abuse against adults who are vulnerable, whether inflicted deliberately or as a consequence of neglect. Since the start of the millennium, a broad spectrum of legislation, guidance, research and reports from all sectors has led to the development of policy and procedures in the safeguarding arena. Closer working partnerships have been forged through both children and adult safeguarding boards and a growing commitment to all those who work with vulnerable groups is leading to improved working practices.

Relevant reports and legislation relating to safeguarding practice with adults and children include:




The Data Protection Act 2018 & General Data Protection Regulation		Regulation of the possessing of information relating to individuals, including obtaining, holding, using or disclosing such information. Provisions including those relating to processing information about safeguarding children and vulnerable adults.
Safeguarding Vulnerable Groups Act 2006		Independent Safeguarding Authority established (later to become Disclosure and Barring Service)
The Human Rights Act 1998		Article 8 Respect for private and family life, home and correspondence Article 9 Freedom of thought, belief and religion Article 10 Freedom of expression
The Crime and Disorder Act 1998		Act to make provision for preventing antisocial behaviour with references to children
Serious Crime Act 2015		Includes offences relating to child cruelty, sexual communication with a child and female genital mutilation (FGM) and coercive or controlling behaviour in an intimate or family relationship

Relevant reports and legislation relating to safeguarding practice with children include:

Children Act 1989		Introduced comprehensive changes to legislation in England and Wales
Children Act 2004		Result of Lord Laming's report into the death of Victoria Climbié
Keeping children safe in out-of-school settings: code of practice (originally published October 2020, updated April 2022)		Non-statutory guidance for providers running out-of-school settings including Christian Sunday schools.

Safeguarding children in whom illness is fabricated or induced 2005		Statutory guidance on protecting children where carers or parents fabricate or induce illness in a child
Safeguarding children from abuse linked to a belief in spirit possession 2007		Non-statutory good practice guidance intended to help practitioners and line managers apply <i>Working Together</i> (see below) to the particular needs of children who are abused or neglected because of a belief in spirit possession
Safeguarding children and young people from exploitation 2009		Statutory guidance outlining how organisations and individuals should work together to protect young people from sexual exploitation
Munro review of child protection in England 2011		Report sets out proposals for reform to focus on child-centred system
Children and Families Act 2014		Practice guidance
Keeping children safe in education 2022 (originally published in 2016)		Guidance to give greater protection to vulnerable children
What to do if you are worried a child is being abused 2015		Guidance to help practitioners identify the indicators of child abuse and neglect and understand what action to take
Working Together to Safeguard Children 2018 (originally published 2010)		Updated guidance for inter-agency working to safeguard and promote the welfare of children; requires faith organisations to have appropriate arrangements in place to safeguard and promote the welfare of children

Relevant reports and legislation relating to safeguarding practice with vulnerable adults include:

No Secrets 2000		Department of Health document developing and implementing inter-agency policies and procedures to protect vulnerable adults and create local authority safeguarding boards
The Mental Capacity Act 2005		Identifies principles for the purposes of the Act including issues around capacity and decision-making
Safeguarding Vulnerable Groups Act 2006		Provides definition of a vulnerable adult

The Mental Health Act 2007	➔	Amends the Mental Health Act 1983, the Mental Capacity Act 2005 and the Domestic Violence, Crime and Victims Act 2004
The Care Act 2014	➔	Introduces well-being principle and the term adults at risk of abuse or neglect
Local responsibilities for sharing information under the Care Act 2014	➔	States local authorities must set up safeguarding boards and cooperate with relevant partners
Health and Social Care Act 2022	➔	Legislative framework to facilitate greater collaboration within the NHS and between the NHS, local government and other partners.

In addition, the publication of the final IICSA report and the following government documents and guidance have been reviewed in the preparation of these procedures and policies:

National Action Plan to Tackle Child Abuse Linked to Faith or Belief (2012)

This deals with concepts of child abuse linked to witchcraft and possession of children by evil spirits to make children to create fear and compliance with other forms of abuse. It may include making a child or young person with difficult behaviour or disability the scapegoat for other sources of difficulties within the family context.

Legal arrangements and requirements vary between England, Scotland, Wales, the Isle of Man, the Channel Islands, Gibraltar and Malta. This section covers the general principles as applied to England. Much of this is the same in all locations but please check with the District Safeguarding Officer (DSO) for specific differences in your legislature.

1.4 Learning from the Past Cases Review

In 2010, the Methodist Conference agreed the need for a review of past child and adult protection cases. This took place between 2013 and 2015 and the results were published in [Courage, Cost and Hope: the Report on the Past Cases Review 2013-2015](#).

Key findings from the review of past cases identified ten themes, which overlap and interconnect in many ways. In summary, these are:

THEME 1 – Abuse and risk are still not always recognised

- Behaviour which might be of concern is still not recognised.
- In particular, behaviour which is potentially grooming behaviour is not recognised.
- Patterns of worrying behaviour are not recognised.

THEME 2 – The huge and ongoing impact of abuse on those who have been harmed

“The ongoing pain and distress of victims/survivors is deep and lasting. It is amplified when they feel they have not been listened to. It is still not always recognised/responded to well.”

Courage, Cost and Hope: the Report on the Past Cases Review (p. 30)

THEME 3

Abuse, which has occurred in a Church setting, is even more distressing and a devastating breach of trust.

THEME 4

There is a need for a further development of listening skills

THEME 5 – People in the Church are still not responding well to serious situations

- Well-meaning people can be naïve.
- Ministers can be very anxious about safeguarding. This may lead to concerns not being shared and sometimes safeguarding is not seen as a team activity.

THEME 6 – People find it difficult to put respectful uncertainty into practice

There is a lack of skill in dealing with contradictory information and a discomfort with challenging situations in which colleagues and friends who have done good things have caused harm.

THEME 7 – Responding well to the congregation in difficult safeguarding situations continues to be a challenge

Ministers often struggle to deal with conflicts and tensions within congregations.

“The impact of abuse within a Church community is often deep and lasting and sometimes cannot be resolved by those enmeshed in it.” ***Courage, Cost and Hope: the Report on the Past Cases Review (p. 35)***

THEME 8 - Recording

Practice has improved but record-keeping is still not consistent.

THEME 9

Effective working with other agencies still requires development

THEME 10

There has been and remains, insufficient understanding of the significance of safeguarding concerns by those who hold leadership roles in the Methodist Church.

There are many instances when those in roles of leadership within the Church (for example, local preachers, worship leaders, stewards) have behaved in a way that is not consistent with safeguarding. Yet among some in the Church, there is limited appreciation that this may present a risk to others and is not appropriate role modelling.

Case Review Process

A case review may be undertaken in relation to any safeguarding case or allegation about which significant concerns have been raised in relation to the application of current policies procedures or practice.

The Safeguarding Director will refer a request for a review to the chair of the Safeguarding Committee for authorisation to initiate a review and to agree the means by which this will be undertaken and its scope. This may include an internal or external reviewer.

Reviews will be undertaken in partnership with the relevant district chair and DSO (as applicable) and will include consultation of those who have raised the relevant concern and other parties involved in the process. The focus of any case review will be learning and development of safeguarding practice.

The outcome of such a review may be:

- amendments to policies and procedures
- communication of required practice change to relevant audiences
- guidance or advice issued to the relevant district from the Safeguarding Committee
- a recommendation that a safeguarding improvement board be set up within the district to explore areas of concern and to deliver an action plan to address identified issues
- referral of individuals to other church processes to address relevant matters.

1.5 Ecumenical context

Among the Christian denominations, there is continuing growth in ecumenical agreement and cooperation on safeguarding, especially between the Methodist Church and the Church of England, as part of the of the Covenant. Our continued participation in the Christian Forum for Safeguarding is of great benefit in building and maintaining relations with all churches, especially the Baptist Union of GB and the United Reformed Church, the Society of Friends, the Catholic Church of England and Wales (CSAS), the Salvation Army, the Church of Scotland, the Assemblies of God and the Churches' Child Protection Advisory Service. Furthermore, these bodies enable and enhance our participation in discussions with government departments and agencies.

In a local ecumenical partnership (LEP), the governing body of each constituent church should decide which safeguarding policy is to be followed by the joint LEP (see [Appendix 13](#)). The policy chosen should remain consistent across all activities. The DSO should be informed of the agreed safeguarding lead in each partnership.

SECTION 2 - Safeguarding Policy Statement

For the purpose of this guidance, safeguarding is defined as protecting the health and wellbeing of children, young people and vulnerable adults. It is about implementing the necessary measures to prevent harm to children, young people and vulnerable adults who are most at risk of abuse and harm. It is integral to the mission of the Methodist Church to value every human being as part of God's creation.

At the heart of the Methodist community is a deep sense of the place of welcome, hospitality and openness, which demonstrates the nature of God's grace and love for all. Our church communities are called to be places where the transformational love of God is embodied and life in all its fullness is a gift, which is offered to all people.

There are no distinctions regardless of gender, race, disability, sexual orientation, religion/ beliefs, pregnancy/ maternity and gender reassignment. Everyone has the right to protection from abuse and to be treated no less favourably than others, irrespective of any personal or protected characteristic.

2.1 Safeguarding in the Methodist Church

Safeguarding is about the action the Church takes to promote a safer culture. This means we will:

- **promote** the welfare of children, young people and adults
- work to **prevent** abuse from occurring
- seek to **protect** and respond well to those that have been abused.

We will take care to identify where a person may pose a risk to others, and offer support to them whilst taking steps to reduce such risks. The Methodist Church affirms that safeguarding is a shared responsibility. Everyone associated with the Church who comes into contact with children, young people and adults who may be vulnerable has a role to play, supported by consistent policies promoting good practice across the whole Church.

The Church and its individual members will undertake all appropriate steps to maintain a safer environment. It will practise fully and positively Christ's ministry towards children, young people and adults who are vulnerable and respond sensitively and compassionately to help keep them safe from harm.

2.2 Commitments

Based on the foundations above, the Methodist Church commits to:

- Promote a safer environment and culture.
- Safely recruit and support all those with any responsibility for children and adults within the church.

- Respond promptly and appropriately to every safeguarding concern or allegation.
- Care pastorally for victims and survivors of abuse and other people who have been affected.

Care pastorally for those who are the subject of concerns of allegations of abuse and others who have been affected.

- Carry out risk assessments and put safeguarding measures in place where individuals pose a present risk to children, young people or vulnerable adults.

This will be done in accordance with the Church's safeguarding policy, procedures and guidance.

2.2.1 Promote a safer environment and culture

Safely recruit and support all those with any responsibility for children and adults within the Church

The Church will select and scrutinise all those with any responsibility for children and adults within the Church, in accordance with the Church's safeguarding policy and practice guidance.

It will train and equip church officers to have the confidence and skills they need to care for and support children, young people and adults and to recognise and respond to abuse. This will be done by providing consistent and accessible safeguarding training.

2.2.2 Putting the policy into action

Churches and circuit and district bodies need to ensure that these commitments are integrated into a local safeguarding policy. Safeguarding policies throughout the Church are active statements underpinning safeguarding work.

All churches and circuits are required to:

- display a copy of the local church or circuit policy, reviewed and updated during the last 12 months, in a location where it can be easily viewed by those entering the church
- display the name of the person responsible for safeguarding and other useful contacts should be provided for those using church premises and seeking safeguarding assistance
- ensure that all officeholders have access to a copy of the relevant church and/or circuit policy and can view the Methodist Church Safeguarding Policy, Procedures and Guidance online
- promote and publicise the safeguarding policies, procedures and guidance of the Methodist Church
- communicate the Church's safeguarding message as outlined in local and Connexional policy documents
- develop processes to assess how well the policy is being implemented, lessons that are being learnt and what difference it is making

- undertake and record an annual progress review.
- refer individuals to relevant church departments to address concerns through the appropriate processes.

2.3 Definitions of abuse and neglect

Abuse is any action that hurts or injures another person either through deliberate action or through acts of neglect. This can be intentional or unintentional: if the behaviour hurts or harms another, then abuse has occurred.

Abuse may manifest in a variety of ways, including:

- physical abuse
- sexual abuse
- emotional or psychological abuse (*e.g. humiliation, isolation either in person or online*)
- Bullying (see [Appendix 1](#) for the Anti-Bullying policy)
- financial abuse (*e.g. theft of money/assets, extortion, predatory marriage*)
- domestic abuse (see [Domestic Abuse \(methodist.org.uk\)](http://Domestic Abuse (methodist.org.uk)))
- spiritual abuse

Neglect is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of individual's health or development.

- ignoring medical, physical or emotional care needs
- failing to provide access to health, care and support or educational services
- withholding necessities of life, such as food, medication and heating
- self-neglect (this can cover a wide range of behaviour such as neglecting your personal hygiene, health or surroundings, and can include behaviours such as hoarding).

For more detailed definitions of the above terms, please see practice guidance in Section 6.

2.3.1 Child-on-child abuse and contextual safeguarding

The Methodist Church recognises that, as children move towards their teenage years, their circles of influence change. Peers and other external influences in the community and online may become more significant. The contextual safeguarding approach highlights the interaction between these different spheres and the potential for positive and negative outcomes. Safeguarding is everyone's responsibility and, therefore, all those engaging with the Church should remain vigilant for indicators of abuse and commit to working with community and statutory partners to create a safer environment. No individual agency or party is likely to have a full view of a particular situation. The Church can play a significant role in supporting young people who are at risk of peer-on-peer abuse, gang membership and sexual exploitation by sharing information and engaging with the community.

Further information about contextual safeguarding developed by the University of Bedfordshire may be found via the following link:

<https://contextualsafeguarding.org.uk/assets/documents/Contextual-Safeguarding-Briefing.pdf>

2.3.2 Child and Adolescent-to-Parent Violence (APV)

Child and adolescent to parent violence (C/APV) is defined as 'a form of family violence that falls under the cross-government definition (and forthcoming criminal offence) of domestic violence and abuse, most often (although not exclusively) directed towards mothers.'¹ Research indicates that this has become more acute since the restrictions imposed because of the global pandemic. Often under-reported, it is an area of familial abuse that does not always see the victims receive the support that they should because of traditional views of authority within a family.

¹ [CAPV in covid-19 aug20.pdf \(ox.ac.uk\)](#)

SECTION 3 - Code of Safer Working Practices with Children, Young People and Vulnerable Adults

Promoting Safer Practice

Safer working practices is critical to good safeguarding. The Church has developed procedures informed by legislation and government guidance. As such, we aim to:

- carefully select and train all those with responsibility within the Church in line with safer recruitment principles
- ensure that any church activities are organised in such a way to avoid the risk of harm to everyone participating
- promote safe spaces that are inclusive and welcoming.

3.1 Code of Safer Working Practice with Children

3.1.1 Appropriate conduct

Church officers will respect all children, young people and adults and promote their well-being.

The Church will create and maintain environments that:

- are safer for all
- promote well-being
- prevent abuse
- create nurturing, caring conditions within the Church for children, young people and adults.

It will work to continue to strengthen and review these environments. This will be done by training, support, communication, learning and quality assurance processes.

The Church will challenge any abuse of power within church communities by ensuring church officers adhere to safe working practice, and are supported in challenging bullying and abusive behaviour. It will ensure that children, young people and adults will be listened to, supported and will know that they will receive care.

You should:

- be aware of and understand the local safeguarding policy
- treat all children and young people fairly and without prejudice, discrimination or favouritism
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and faith and challenge behaviour that demonstrates discrimination and/or prejudice
- ensure that your own language, tone of voice and body language is respectful
- always aim to work with or within sight and hearing 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 and young people know who they can talk to or contact if they need to speak to someone about a personal concern and encourage them to speak out if they feel uncomfortable or concerned. They should be made aware of organisations that can provide support.
- respond warmly to a child who needs comforting but this should not involve physical comfort e.g. cuddles.
- advise children, young people and their parent/carers/guardians in advance if any activity requires physical contact and provide an opportunity to opt out or agree alternative activities.
- administer any necessary first aid with others around
- obtain consent for any photographs/videos to be taken, shown or displayed via any medium. *(This should be from the parent, carer or guardian and the young person if 12 years or over. Images should not be taken or stored on personal devices).*
- record any incidents that concern you or make you feel uncomfortable and give the information to your group leader in the first instance. Although you must also contact the church, circuit or district safeguarding officer immediately if you believe you have acted in a way which others may have interpreted as inappropriate or if a child has acted inappropriately towards you. Records must be signed and dated.
- always share concerns about a child or the behaviour of another worker with your group leader and/or the safeguarding officer.

You should not:

- initiate physical contact and if this is initiated by the child, do not pull away abruptly but do so gently so physical contact is for the minimum amount of time
- invade a child's privacy whilst they are washing or using the toilet
- play rough physical or sexually provocative games
- use any form of physical punishment
- be sexually suggestive in the presence of or to a child, even as a joke
- touch a child inappropriately or forcefully
- scapegoat, ridicule, reject or ignore a child, group or adult
- allow abusive peer activities (e.g. initiation ceremonies, ridiculing or bullying)
- show favouritism to any one child or group
- allow a child or young person to involve you in excessive attention-seeking that is clearly physical or sexual in nature
- give lifts to children or young people on their own or on your own

- smoke any substance, vape or consume alcohol in the presence of children or when responsible for them
- provide personal contact details to a child or young person such as mobile number, email or social media contact
- share sleeping accommodation with children
- arrange social occasions (this includes online activity) with children or invite them to your home outside organised group occasions (other than with the consent of parent, carers or guardians and where at least one other adult is present)
- allow unknown adults access to children (visitors should always be accompanied by a known person)
- allow strangers and those who are not authorised to give children lifts.

3.1.2 Appropriate dress

You should dress appropriately when working with children and not wear anything revealing or that is not practical for carrying out the tasks as part of your role.

3.1.3 Receiving gifts

There may be occasions when children give you gifts. It is polite to accept a gift but your group leader should be informed. If you receive any gift of significant value, e.g. more than £15.00, you should talk with your group leader about whether it is appropriate to accept it. As a general rule, expensive gifts should not be accepted.

For further guidance on procedures for safer working practices when managing activities for children, please refer to [Appendix 2](#).

3.2 Code of Safer Working Practice with Adults

3.2.1 Appropriate conduct

You should:

- treat all adults with respect and dignity
- ensure that your own language, tone of voice, and body language are respectful
- record any incidents of concern and give the information to your group leader, sign and date the record
- share concerns about an adult or the behaviour of another worker with your group leader and/or safeguarding officer.

You should not:

- invade the privacy of an adult who is washing and toileting
- use any form of physical punishment or restraint (apart from car seat belts)

- be sexually suggestive about or to an adult, or scapegoat, ridicule or reject an adult or group
- permit abusive peer activities (e.g. initiation ceremonies, ridiculing or bullying)
- show favouritism to any one adult or group
- allow an adult to involve you in behaviour that is overtly physical or sexual
- allow unknown adults access to adults deemed at risk of harm (visitors should always be accompanied by a known person)
- allow strangers to give lifts to adults in your group.

3.2.2 Visiting adults at home

- Most visits to adults in their own home will be straightforward as they will be well known to the church. However, when visiting someone new for the first time, visitors should let someone else know whom they are visiting (and when).
- Visiting in twos may be advisable, especially if the adult lacks capacity. It is also advisable to take a mobile phone.
- Do not call unannounced. Call by appointment, telephoning the person just before visiting if appropriate.
- Be clear about what support can be offered to the adult if they ask for help with particular problems and refer back to the church if uncertain.
- Do not make referrals to any agency that could provide help without the adult's permission, and ideally encourage them to set up the contact.
- Never offer 'over the counter' remedies to people on visits or administer prescribed medicines, even if asked to do so.
- 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.
- Pastoral visitors should note the date when they visit people, report their visit to the pastoral secretary and say what is concerning or going well. The pastoral secretary will report safeguarding concerns to the minister and safeguarding officer as appropriate and agree what action should take place and who should record the incident.

SECTION 4 - Responding well to Safeguarding Incidents

The safeguarding policy, procedures and guidance of the Methodist Church have been created in order to:

- **PROMOTE** the well-being of children and adults through a culture of shared responsibility for safeguarding within clearly assigned roles.
- **PREVENT** harm through best practice and the creation of a culture of informed vigilance.
- **PROTECT** through responding effectively when safeguarding concerns arise.

This section identifies actions that should be taken when a safeguarding concern is raised. This may relate to allegations made about an officeholder, employee, member or volunteer or someone not connected with the Church where anyone is seeking help or support from someone in the Church.

The concerns may be about current or past events, but the response should be the same. Past events can still give rise to current safeguarding concerns.

Allegations that do not fall into the above categories but still amount to inappropriate conduct within the Church may mean that consideration needs to be given to invoking disciplinary processes or handling it by way of advice, supervision and training. In these situations, the employer/supervisor/line manager will need to decide the course of action.

Anyone who brings any safeguarding suspicion, concern, knowledge or allegation of current or former abuse to the notice of an officeholder within the Church will be responded to respectfully and actively. All suspicions, concerns, knowledge or allegations that reach the threshold for reporting to the statutory authorities, will be reported. This will be done irrespective of the status of the person.

All officeholders and employees within the Church will work in partnership with statutory authorities where relevant. In responding to concerns or allegations of abuse relating to ministers, the Church will act in accordance with the requirements of criminal and civil law and the Constitutional Practice and Discipline of the Methodist Church, and so will respect the rights and uphold the safeguards afforded in these, to both the victim/survivor and the subject of concerns or allegations.

4.1 Responding well

There are many situations about which a member of the Church may have concerns, or be made aware of concerns, regarding a child or adult. Such a person must consult the minister, church or circuit safeguarding officer and DSO within one working day. The only exception to the above is if one of them is the subject of the concerns. If that is the case, then they will be excluded. Under no circumstances, should the person who is the subject of the allegations be informed until after the

allegations have been discussed and agreement reached with the statutory authorities. Further action will be decided in discussion and agreement with the statutory agencies.

4.1.1 Listening to those who raise concerns

If approached by anyone wishing to talk about a concern, follow the basic guidelines below:

- Consider whether the time and place are appropriate for you to listen with care and security. Do not defer listening, but seek the other person's agreement to find a suitable place to listen.
- Stay calm and listen to the information very carefully, showing you are taking seriously what you are being told. Do not pass judgement, minimise or express shock or disbelief at what you are being told.
- Listen with undivided attention and help the other person to feel relaxed. Do not put words into their mouth.
- Take into account the person's age and level of understanding. It may be appropriate to ask if they mind you taking notes while they talk or at the end so you can check with them that you have understood everything correctly – but only if it is appropriate.
- Do not make promises you cannot keep.
- Do not promise confidentiality but explain what you will do with the information (see Section 7).
- Find out what the person hopes for.
- Reflect back key points of what has been said to confirm you have understood what has been communicated.
- Provide a privacy notice and explain in a clear and simple manner the information contained in it.
- Either during (if appropriate) or after, make notes of what was said, including the date, time, venue and the names of people who were present. Sign the record.
- The DSO should always be advised when a referral is made to Children's Services/the police.
- Provide the person with the means to contact you and be clear about how and when you will give feedback. Be prepared to continue to be there for the person. Be dependable.
- Do not contact the person about whom allegations have been made.
- Offer reassurance that disclosing is the right thing to do.

Figure 1.0

Level 1: RISK OF HARM IS LOW	Level 2: MEDIUM RISK OF HARM	Level 3: RISK OF HARM IS HIGH
<p>Low level concern – behaviour that is inconsistent with expectations of the Church as set out in the safer working practices in the policy document.</p> <p>Support can be managed locally where action can be taken to resolve matters and maintain safety of all.</p>	<p>Behaviour that may harm a child, young person or, vulnerable adult.</p> <p>Advice and guidance of the DSO is required to identify risks and provide additional support to safeguard children and young people, vulnerable adults, congregations, clergy, employees and volunteers.</p>	<p>Behaviour that has or may have harmed a child, young person or, vulnerable adult.</p> <p>Possible criminal offence committed against or related to a child, young person or, a vulnerable adult.</p> <p>Without the support of the CST the risks to individuals, churches and the wider Connexion could escalate.</p>
<ul style="list-style-type: none"> ▪ Needs can be met by circuit safeguarding officer ▪ Advice and support 	<ul style="list-style-type: none"> ▪ Risk assessment may be undertaken ▪ Training provided ▪ Church supervision and oversight ▪ Referral may be required to statutory agencies ▪ MSG and safeguarding contract implemented ▪ Safeguarding panel arranged ▪ Case is referred to the Safeguarding Committee 	<ul style="list-style-type: none"> ▪ Risk assessment arranged ▪ Refer to police ▪ Refer to DBS / PVG ▪ Refer to LADO ▪ Refer to Children's Services ▪ Refer to Adults' Services ▪ Inform media/communications ▪ Complaints and Discipline colleagues informed

4.1.2 Low-Level Concerns

A low-level concern is any concern that an adult has acted in a way that **is inconsistent with the Codes of Safer Working Practice** (see section 3 above). It includes conduct that does not meet the threshold of harm or is not considered serious enough for more formal intervention measures. Government guidance states that 'low-level' concerns should not be considered as insignificant and that any behaviour that causes those observing it to have a 'sense of unease' or 'nagging doubt', should be taken seriously 'no matter how small'.

Serious case reviews and research have consistently shown that before the abuse escalates into serious harm, there are behaviours that were observed that caused those around to feel uneasy. However, as the behaviour did not meet the threshold it was not reported and therefore it could not be prevented from escalation. The importance of sharing and recording the information is vital. Even if it appears to be thoughtless or inappropriate, it is critical to keep a record of the behaviour so that preventative measures can be taken to avoid it becoming more serious. This allows for any

emerging patterns of worrying behaviour to be identified and acted upon early. The staff code of conduct provides a guide for what is safer working practice and must be viewed as a guide to interacting appropriately with children, young people and vulnerable adults.

4.1.3 Emergency situations

The person receiving the information will need to assess whether the subject of the concern is at risk of immediate harm and, if so, take any immediate action necessary to safeguard them including contacting statutory authorities such as police, child or adult services.

The following questions should be considered:

- Does their initial presentation and any information provided suggest physical, emotional or psychological harm or imminent serious risk?
- Is there any indication of control, intimidation or fear being applied by another connected party? This could be someone present with them, waiting for them or in control of domestic or work circumstances or their associates.
- Are they in safe accommodation or at risk of homelessness?
- Do they have enough to eat?
- Do they need urgent medical attention?

4.1.4 Assessment of risk

The following risks should be reviewed regularly in regard to any concern raised:

- to the victim/survivor
- to members of vulnerable groups within the church and involved with church activities
- to the person believed to be responsible for the issue and their family
- to the wider congregation or attendees at church activities
- to the wellbeing or safety of clergy, employees and volunteers in responding to the situation
- loss of information/records
- to the reputation of the Methodist Church.

It is the responsibility of everyone to consider the risks presented by any situation from the moment they become aware of a possible safeguarding concern. Direction may be given by police/Children's Services or Adult Social Care as to how to respond to certain risks when a referral has been made. Advice may be sought from the DSO in relation to measures that may minimise specific risks in any case.

Measures to manage risk could include suspension, an interim safeguarding contract, specific arrangements for activities or church attendance and liaison with others within and outside of the Church. Following the safeguarding policies, procedures and guidance outlined in this document

may assist in managing risks that are identified. Specific procedures are laid down for certain forms of risk assessment (e.g. a safeguarding contract) and particular parties are responsible for undertaking those assessments. In most cases, the ongoing consideration of risk should be an integral and continuing part of responding well to an incident.

Activity risk assessments

While the Church recognises that it is not possible to avoid all risk when working with vulnerable groups, it is possible to try and minimise those risks. This can be achieved through careful planning and preparation and by providing a written record of the thought processes and action taken. Activity risk assessments should be undertaken before any activity takes place, approved by the event leader/minister and retained securely in case they need to be seen at a later date (e.g. as a result of an accident taking place).

Activity risk assessments should include:

- the nature of the activity
- the location
- transport needed and associated issues (e.g. insurance)
- staffing levels/gender
- experience of staff
- ages of the group attending, abilities, special needs
- medical and health needs of the group
- emergency planning
- risks
- action needed to address the risk
- a named person for resolving risk issues.

4.1.5 Referring to statutory agencies

In most situations, a referral to the Local Authority Designated Officer (LADO) and/or Children's Services (depending on local provision) or adult safeguarding (local authority) in Adult Services should occur within **one working day**. It is preferable for the DSO to do this but, if the DSO is not available, anyone can do it. The church must follow the advice given by statutory agencies (Children's Services, Adult Social Care/police) in determining what can be said and when to the subject against whom allegations have been made. While this may be uncomfortable for those who know the person concerned, failure to follow this advice could result in:

- risk to the safety of children or adults
- loss of evidence which may hinder any investigation
- increased anxiety for the subject of allegations before adequate information is available about the situation and next steps
- damage to the Church's reputation for appearing to collude with a subject of allegation.

Information for a referral to statutory agencies

The following information should be collated to support a referral to statutory agencies. However, where items are not available, the referral should not be delayed and further updates can be provided as the situation progresses.

For all referrals:

- the name, date of birth and address of the person at risk
- names and addresses of parents or carers
- names of other significant people within the household (including all names and ages of those under 18)
- any other contact details (e.g. others who may be at risk of harm)
- any other professional known to be involved with the person at risk or family (where appropriate)
- the date, time and context of the disclosure
- nature of the alleged abuse/concern including details of the disclosure
- what impact the alleged abuse is having on the person including their wishes and feelings about the situation and possible outcomes
- any known or previous issues of concern
- your knowledge of the personal circumstances
- any work undertaken by the Church with the person at risk or family
- names of those who are aware of the referral (person at risk, family, alleged perpetrator etc.)
- what the person disclosing the concerns has been told will happen next
- name and contact details of the DSO
- your name and contact details.

It is good practice to be transparent and to inform parents that you have safeguarding concerns about their child and as a result you are making a referral. However, parents or carers should not be told when a referral is being made if this will put the child at risk or further risk of harm.

In addition, for adult referrals:

- whether consent for referral was given and your view on the adult's capacity
- what the adult has been told will happen next.

Once a decision has been made to make a referral to the statutory agencies, the information listed above will need to be passed on whenever possible.

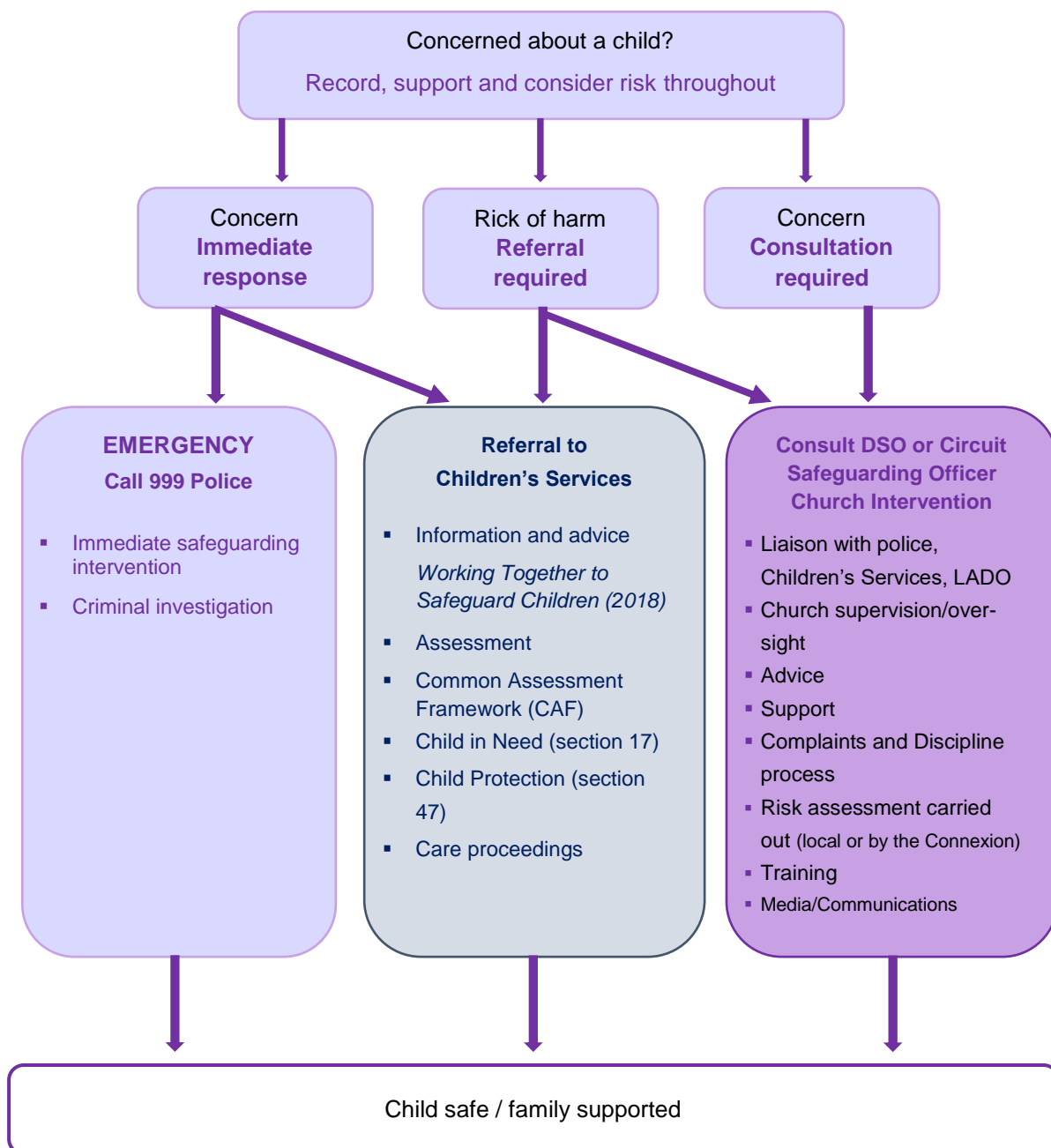
If you do not have all the above information, pass on what you do have. If you are passing on information via telephone, you will need to follow up in writing by noon the following day at the latest. 'In writing' includes email correspondence or use of the local authority online referral form, as required. The child/young person's or vulnerable adult's safety is the priority and there must not be a delay.

What can you expect from Children's Services/ Adult Social Care/police?

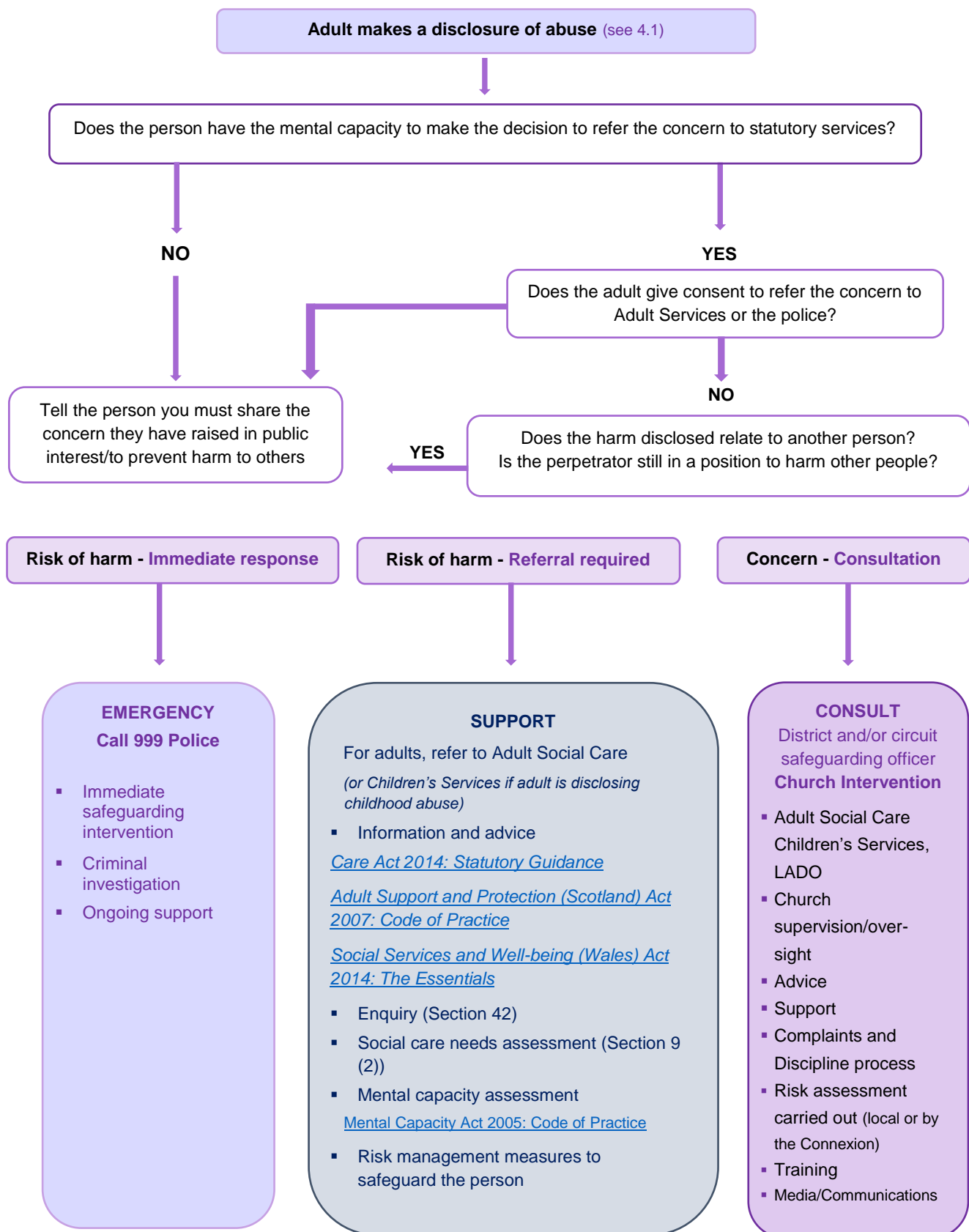
- they will check previous records to determine what action to take
- they have a duty to ensure the person is safe from harm and aim to progress an enquiry as soon as possible, including seeing the person
- their name and contact details
- what action they intend to take and when
- advice to you on what to do next
- a timescale for action and an update on action taken (where confidentiality permits).

Statutory agencies have been advised that personal information from referrers who are members of the public should only be disclosed to third parties (including subject families and other agencies) with the consent of the referrer. Some church workers with children will count as members of the public for this purpose and so the details will not be shared routinely. However, a person in a role of responsibility within the church cannot expect anonymity. If you have concerns about the disclosure of personal information, discuss this at the time of the referral with your DSO or the agency to which the referral is being made.

Flowchart – Response to concerns about a child



Flowchart – Adult disclosure of abuse



In each local authority, there are published procedures for use by anyone in the area dealing with the possible abuse of a child or adult. Those procedures are usually available online. No one should be deterred from making a referral because they are unsure about the formal procedure.

Everyone should find out which local authority they need to contact in the event of a referral being necessary.

What will happen next?

Outcomes open to statutory agencies following referral include assessment, strategy meetings, case conferences, investigation and longer term interventions. Ministers and other church members may be asked to attend meetings, provide statements or give evidence in legal proceedings. In this case, the DSO needs to be consulted and the District Chair and superintendent must be informed.

When do you have to inform the DSO and the local minister?

Remember to inform the DSO as soon as possible, and within 24 hours at most, that you have made a referral and record the information.

Some examples:

- a) An adult member or child has been or is being abused or mistreated by someone connected with the church, such as a member of staff, volunteer or charity trustee.
- b) Someone has been abused or mistreated and this is connected with the activities of the church.
- c) Allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place.
- d) There are grounds to suspect that such an incident may have occurred.
- e) There is a current allegation of abuse against a child or adult.
- f) Someone in a local church has been suspended or dismissed from work or investigated or arrested for allegations of abuse against children or adults.
- g) One or more children or adults are considered to be at risk of harm.
- h) A member or regular attendee is known to have been convicted of sexual offences against children or adults, is currently or has been subject to investigation for an offence against a child or adult in the past year or there have been investigations or convictions for domestic violence.

When do you have to inform the Connexional Safeguarding Team?

The following circumstances must be referred to the Connexional Safeguarding Team:

- any **safeguarding** concern relating to ministers (**including poor safeguarding practice**)
- any **safeguarding concern relating to role holders which has been referred to the LADO or equivalent local authority officer (including poor safeguarding practice)**
- cases where a Connexional risk assessment will be needed

- where a church or district has been requested to respond to a review undertaken by a statutory body following a serious incident (e.g. Serious Case Review, Domestic Homicide Review)
- any case where there is or has been a statutory investigation of someone holding a position of trust in the church
- disclosure of non-recent abuse
- introduction of a safeguarding contract, annual and three yearly amend/remove review
- any safeguarding case that fits the serious incident criteria for reporting to a charity regulatory body
- any case that has or is likely to come to the attention of the media or may impact the reputation of the Methodist Church.
- any case that has been or is going to be referred to an insurance company in relation to a claim for compensation regarding a safeguarding matter
- any case for which a complaints and/or discipline process has been initiated which includes a safeguarding concern or poor safeguarding practice.

The following details (where known) may be requested by the Connexional Safeguarding Team relating to any case fitting the above criteria:

- name, date of birth and contact details for the subject and survivor
- an outline of the circumstances of the concern including the location, time period, connection to the Church of the parties involved, nature of behaviour or actions causing concern and actions taken in response.
- confirmation that pastoral support and/or counselling has been offered where parties are known to the Church
- confirmation of the date privacy notices were supplied to survivor and subject or relevant circumstances, if they have not been provided
- date of first contact with statutory authorities (police, children and adult services, Charity Commission, LADO, as applicable)
- details of referrals to insurance companies regarding compensation claims related to safeguarding matters, where appropriate.
- copies of safeguarding contracts and related documentation and confirmation of contracts with dormant status

The sharing of such information is proportionate, necessary and legitimate to manage safeguarding risk within the Church and provide appropriate oversight of safeguarding practice.

The data is processed for the following purposes:

- casework supervision and guidance by members of the Connexional Safeguarding Team

- the production of management information to inform church wide decision-making on safeguarding
- management of cases where there is involvement of Conference Office or other church processes
- evaluation of compliance with the requirements of statutory legislation, safeguarding policy procedure and guidance on a Connexional basis.

The data shared with the Connexional Safeguarding Team is used to collate records on the current digital system for managing safeguarding records on the Connexional Team server. Access to this system is limited to safeguarding officers and a limited number of role holders within Conference Office who oversee the management of safeguarding concerns and related processes. The data will transfer onto a shared safeguarding recording system for DSOs and members of the Connexional Safeguarding Team when this becomes available.

Where there are concerns about the disclosure of data, these should be discussed with the Casework Supervisor at the earliest opportunity. Where necessary, issues may be referred to the Safeguarding Director for consideration.

4.2 Recording

In a church context, 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 or formal proceedings
- allow for continuity when there is a change of personnel.

All records must be kept in a secure place and only shared in accordance with legislation, government guidance, Methodist Church policy, procedure and guidelines (see Section 7).

When making records the following practice should be followed:

- Wherever possible, take notes during any conversation (or immediately after if more appropriate).
- Ask consent to make notes, taking age and understanding into account.
- Explain why you want to take notes, and that they can have access to the information they have shared with you.
- Include:

- who was involved: including any actual or potential witnesses to what happened. Where possible, exact quotations of what was said, identified by quotation marks, are helpful, particularly when recording something that has been said of significance.
 - Where it happened: Record specific details of the location and context.
 - When it happened: Be specific about the timing and frequency of the situation, where possible.
 - How it happened: Describe how actions were carried out including the nature and level of any force used, the period over which the behaviour was experienced.
 - The context in which it took place: Note any connections between the parties, particularly where the connection resulted in a power differential between one party and another.
 - The impact on any party: If the survivor or other party shares how they felt about what happened, record this information.
- Keep a log of all actions you have taken and details of referrals to statutory agencies.
 - Make sure your notes are legible, clear, concise, relevant, thorough and jargon free.
 - Use the person's own words and phrases. Do not attempt to sanitise language or improve grammar.
 - Ensure the notes are up to date, signed, dated and timed.
 - Ask the person to review the notes and confirm that they are accurate.
 - Pass records to the DSO as soon as possible but at the latest by noon of the next day.

NB: As part of the Independent Inquiry into Child Sexual Abuse led by Professor Alexis Jay, there is currently a legal requirement under Section 25 of the Inquiries Act for churches and other relevant organisations in England and Wales to retain documents relating to child protection and allegations of child abuse made against individuals or the organisation. This also includes child protection policy documents. The legal requirement not to destroy such material has precedence over retention requirements under the Data Protection Act 1998 for the duration of the inquiry.

4.3 Caring for those who have suffered abuse

The Church will offer care and support to all those who have been abused, regardless of the type of abuse, when or where it occurred. Those who have suffered abuse within the Church will receive a compassionate response, be listened to and believed. They will be offered appropriate pastoral care, counselling and support, according to their expressed and agreed need, as they seek to rebuild their lives. For the purpose of this document, the terms victim and survivor are used to refer to people who have experienced abuse. However, it is the policy of the Methodist Church to demonstrate ask etiquette so that victims and survivors determine how they are identified.

An appropriate pastoral response to the family, local church, circuit and wider community will be provided, with due regard to the right of privacy of those directly involved, and to the administration of justice.

The Methodist Church recognises that abuse of an individual by someone within a church can have a negative impact on not only the survivor, but their family, the perpetrator's family and the church community. The impact will be different for different people and assumptions cannot be made about the severity of the impact and its perceived seriousness. The Church aims to respond to those affected by abuse in accordance with legislation and guidance but also with respect and compassion, providing pastoral support and additional support where appropriate.

The policy and procedures apply to:

- children and young people under 18 alleging abuse by someone within the Church
- adults alleging abuse as a child by someone within the Church
- adults alleging abuse by an adult within the Church
- children, young people and adults alleging abuse by someone outside the Church
- families of those affected by allegations of abuse
- members of the local church where an allegation of abuse (such as against a minister) has had an impact on them.

The Church will always aim to provide appropriate pastoral support to those in need, particularly where there may be survivors of abuse from the congregation. However, those receiving or dealing with reports of abuse should also consider whether other forms of support may be appropriate in addition to or instead of pastoral support within the Church. This may particularly be the case where the person is actively involved with another church or faith or has disengaged from the Methodist Church as a result of abuse.

4.4 Principles and procedures for providing support

The Methodist Church has commissioned a service in order to be able to offer short-term counselling to survivors and those affected by abuse in the Church. This may be accessed via District Safeguarding Officers who will liaise with the Connexional Safeguarding Team.

- If an allegation has resulted in a referral to the statutory agencies, then the provision of support will be discussed and agreed with those agencies.
- Whether or not a referral is made, the support needs of all those affected by the allegations (including the individual and family members, the accused and their family members, the minister and other church workers) must be considered and should be coordinated by the DSO.
- Support for historical allegations will be treated in the same way as for current allegations.

- Pastoral support will always be offered but there may be times when additional support is identified or requested, such as counselling or financial help. Any such requests must be referred to the DSO and district safeguarding group and the insurers consulted. The DSO/district safeguarding group will be responsible for communicating with the insurers.
- Pastoral support should not be provided by parties who are directly involved in the management of the case or who are supervising or overseeing of anyone about whom there is a concern.
- Where additional support is agreed, the DSO together with the local church will make the necessary arrangements and a written agreement will be drawn up clarifying the terms of the support offered.
- Where support is offered, it will be provided in a way that respects race, culture, age, language, religious beliefs, gender and disability.
- Any support offered will be decided by focusing on the best interest and welfare of the children and adults involved.
- Careful consideration will be undertaken about encouraging contact with groups of a similar language or culture if there is any indication that this may be relevant to the abuse being suffered or may increase the level of risk to them.

4.4.1 Helping recovery and responding well

Recovery after any form of abuse is complex and will vary among individuals. The following aspects may be important for survivors:

- the opportunity to tell the story (to name the sin and share the experience)
- for someone to hear their story (that is, to believe and acknowledge the harm done and the fact that the victim is not to blame)
- receiving a compassionate response to the victim (that is, to 'suffer with' is to walk with the person rather than try to 'problem-solve' immediately)
- an effort to protect the vulnerable from further harm (both the victim and any others who may be at risk)
- the community holding the perpetrator to account
- an act of restitution in as far as this is possible (though this does not necessarily include institutional or financial liability)
- unambiguous vindication: what a victim of abuse expects at any time when he or she shares his or her experience
- being made aware of support groups so they have the choice to engage with others who have had similar experiences if they feel this is helpful.

It is important to be clear about what a survivor of abuse expects when they share their experience. Those in authority may be anxious about any suggestion of institutional culpability, but this should never eclipse our higher duty to provide pastoral care or additional support if appropriate.

It is essential for survivors to know that they can trust those who are supporting them and it may take time to build up this trust. Many survivors will not readily disclose their experiences. Those who are affected by modern slavery or who have experienced difficult or damaging outcomes from statutory agency engagement may fear and mistrust their involvement. They may fear their involvement due to past experience in the UK or other home countries. Survivors can lose contact with family, friends and community whether through feelings of shame, manipulation or fear of reprisals. Social isolation can represent an additional source of vulnerability and anxiety. The absence of suitable support may result in survivors returning to damaging situations or, in the case of modern slavery, further trafficking.

4.4.2 Disagreement

If there is any disagreement about the support to be offered, the person affected must put their views in writing to the DSO who will share and discuss it with the district safeguarding group. Following such a consultation, the insurers may need to be consulted before a reply is sent.

The decision of the district safeguarding group and the insurers will be final.

4.4.3 Caring for the congregation

Consideration must also be given to the impact of an allegation on the congregation. The DSO should discuss the provision of support with the superintendent who will be responsible for coordinating it. This should be done in consultation with the statutory authorities and the media office and the following areas considered:

- what information can be shared
- when and how information can be shared - this may include a statement to the congregation delivered by the agreed minister (local, superintendent or District Chair)
- where and to whom people can go for support.

After an investigation or actions taken to deal with an issue which has had a significant impact on the church, consideration may be given to a visit by one or more of the following: DSO, district chair and superintendent. It can be difficult to define the right moment for this as the church may continue to manage the situation and the subject's involvement in the church for many years to come but it is good pastoral practice to review the differing needs within the church and its wider community.

The aim of the visit is to acknowledge people's pain and listen to how they are feeling, identify support, enable recovery and support future ministry.

4.5 Additional actions

Whether an allegation is made about a minister, member or volunteer, the Church Council will need to consider what additional action, aside from a referral to the statutory agencies, may be necessary to safeguard other people from potential harm.

4.5.1 Suspension of ministers, probationers, students or lay office holders

Suspension is expected during any inquiry, irrespective of role. However, there are some differences in procedure if the person is a minister or officeholder, an employee or a volunteer.

Suspension under Standing Order 013

Standing Order 013 sets out the process for suspension of a minister, probationer, student and lay office holder. This Standing Order should be considered and guidance taken before any suspension takes place.

No one other than the responsible officer can suspend under SO 013 and those who can undertake this role are identified in the standing order. **This responsibility cannot be delegated to DSOs and their position is to advise the responsible officer in relation to safeguarding matters relevant to suspension and not to make suspension decisions or carry out suspension on that officer's behalf.**

Suspension of lay employees

Any lay employee who is a member of the Church and holds an office to which SO 013 applies can be suspended under SO 013. Any such suspension should only be undertaken following legal advice on the employment contract.

A lay employee who is not a member of the Church cannot be suspended under SO 013. They can only be suspended by their line manager on the basis of the employment contract and after consultation with the district lay employment secretary.

Resignations

When someone resigns, the Church remains responsible for investigating any safeguarding concerns and reporting these to the statutory authorities. This applies whether it is a lay office holder in the Church who resigns from their role, a member who stops worshipping at the local church or an employee.

Every effort must be made to reach a conclusion in all cases of allegations bearing on the safety or welfare of a child/adult, even if the person concerned refuses to cooperate with the process.

The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be regarded as substantiated on the basis of all the information available,

should continue even if the person does not cooperate. It may be difficult to reach a conclusion in those circumstances but it is important to reach and record a conclusion wherever possible.

Lay employees – disciplinary action

If a risk assessment raises concerns about a lay employee continuing in their current role, legal advice must be obtained before any steps are taken to address the concerns. The same applies to the conclusions of a Safeguarding Panel through misconduct or disciplinary proceedings.

4.5.2 Notifying the Connexional Media and Communications Team

It is the role of the DSO to discuss communicating about the matter with the media office and designated officer/adult safeguarding (local authority)/police. The Connexional Media and Communications Team can help with preparing a range of communications including:

- statements to be prepared in advance and issued if there is an approach by media
- statements to the congregation by ministers
- responses for individuals within the church who may be affected by specific situations.

To ensure that any information provided is coordinated, and to benefit from ongoing support, the DSO will alert the Connexional Safeguarding Team about any matter that may be of media interest or need sensitive communications. Statements delivered to the congregation will be made by the minister deemed most appropriate to deliver them following consultation with those managing the case at district level.

A member of the Connexional Media and Communications Team is always available to provide support during and outside working hours (via email mediaoffice@methodistchurch.org.uk and, out of hours telephone 020 7467 5170). The Media and Communications Team should be made aware of matters as soon as possible to allow suitable statements to be prepared.

For information about notifying insurance companies and charity regulatory bodies, please see [Appendix 3](#).

4.5.3 Duty to refer to the Disclosure and Barring Service and PVG Scotland

The DBS/PVG helps employers to make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups. It replaced the Criminal Records Bureau and Independent Safeguarding Authority.

Referrals are made to the DBS/PVG when an employer or organisation has concerns that a person has caused harm or poses a future risk of harm to vulnerable groups. An employer or volunteer manager is breaking the law if they knowingly employ someone in 'regulated activity' with a group from which they are barred from working.

For a fuller explanation of the duty to refer, click on the following links:

DBS referral chart: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/502089/DBS_referral_flowchart.pdf

Guidance about referring to the DBS: [DBS paper referral form guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/502089/DBS_referral_flowchart.pdf)
[Making a referral to Disclosure Scotland - mygov.scot](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/502089/DBS_referral_flowchart.pdf)

Completing the online referral form: [Making barring referrals to the DBS - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/502089/DBS_referral_flowchart.pdf)

4.6 Responding well to allegations of historical child sexual abuse

Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

4.7 Responding well to those who might pose a risk

The Church aims to provide pastoral care for all its members, including those who are suspected of causing harm or have caused harm to others. However, in this context, such care must be provided in a way that prioritises the safety of other church members, while enabling the person who poses a risk to worship and be a part of the church community.

A legal presumption of innocence will be maintained during the statutory and church inquiry processes. The Church will ensure that steps are taken to protect others when any church officer and/or minister is considered a risk to children, young people and vulnerable adults. This will be done by working to mitigate any identified risks with a safeguarding contract or other appropriate measures.

The Church will ensure that any risk has been assessed and is being managed in a safeguarding contract in accordance with the Church's safeguarding policy and practice guidance. This will be done in collaboration with the relevant statutory agencies, in accordance with criminal and civil law and Standing Orders.

In its response to suspicions, concerns, knowledge or allegations of abuse, the Church will respect the rights of those who are subject to allegations, regardless of role or position. As the processes develop, additional assessment, therapy and support services may be offered.

The Church will be mindful of the need to provide support to members of families, congregations and wider communities affected by the church officer/minister's changed situation. The Church, based on the message of the gospel, opens its doors to all therefore, it will endeavour to offer pastoral care and support to any member of the church community who may present a risk.

General Data Protection Regulation (GDPR) requires that privacy notices are supplied to those about whom information is received by the Church. This includes direct disclosures from the parties involved and third party reports about others. Privacy notice forms may be found on the [Methodist Church website](#).

There is provision for the processing of data for safeguarding purposes without consent under Schedule 1, Part 2 of the Data Protection Act 2018 (see [Appendix 4](#)).

What is a Safeguarding Contract?

A safeguarding contract is an agreement made locally or following a Safeguarding Panel to facilitate involvement in roles, responsibilities or activities in the life of the Church or attendance at worship. This was formerly known as a Covenant of Care. A safeguarding contract will be put in place following risk assessment activity.

Interim safeguarding contracts are temporary arrangements put in place to address potential safeguarding concerns during an internal or external investigation, inquiry or process. This may include criminal investigations, assessments by child or adult social care services and internal inquiries undertaken under Methodist complaints, discipline or safeguarding procedures. Interim safeguarding contracts will be orchestrated by the DSO in consultation with relevant colleagues from within the Church or external agencies, as required by the circumstances. A contract of this nature will be kept under review by the DSO to ensure that it remains appropriate and addresses the changing nature of safeguarding risks, as the situation progresses.

When is a Safeguarding Contract Appropriate?

A Monitoring and Support Group (MSG) and safeguarding contract are required when a person:

- i) has been convicted, of or has received a simple or conditional caution in respect of an offence referred to in Standing Order 010 (2); or
- ii) has been subject of a recommendation by the Safeguarding Committee that clause 2 below should apply.

Standing Order 690, Constitutional Practice and Discipline of the Methodist Church. (Clause 2 relates to the setting up of a Monitoring and Support Group and safeguarding contract.) The

Information Management

Where a safeguarding contract is being considered, there is a high likelihood that special category personal data and criminal data (as defined in the General Data Protection Regulation) may be processed. This brings clear responsibilities for handling data securely and the manner in which data is sent or shared must be considered carefully. At all times, information provided to the Church must be managed, held and shared in line with GDPR and the Data Protection Act 2018. As part of this process, those collating information **must** consider carefully who is aware of the data they receive from other parties. It is easy to forget that in many cases, the general public may be less supportive of efforts to rehabilitate those connected to certain types of offending. The inappropriate release of information to an unauthorised source could put the person and their family at risk in the community. **See [Appendix 4](#) for detailed information about procedures for managing safeguarding information.**

offences included in Standing Order 010 (2) are those under the Sexual Offences Act 2003 and Schedule 15 of the Criminal Justice Act 2003.

For detailed information about the process for establishing a safeguarding contract, please see [Appendix 5](#).

4.7.1 Making contact with police or probation services

In some cases, contact may be initiated with the Church by a police or offender manager on the release of a party from custody or their arrival in the local area. It may be helpful to speak to a prison chaplain if it is known that the party wishing to engage with the Church has had contact with them. In other cases, the DSO will approach police or probation services when they become aware that a party wishing to engage with the Church has a conviction or caution for an offence specified in Standing Order 010.

Officers from statutory agencies, who are unaware of the Church's safeguarding provisions, may ask for confidential disclosure to one party. It is of critical importance that the Church's safeguarding structure is explained to ensure that the officer is aware of the need for appropriate information sharing within the Church.

Where the person is subject to supervision by probation services, the relevant officer should be contacted, before any contract is put in place. Where a person subject to a contract is on the Sex Offenders' Register, contact must be made with the police officer supervising that person, before any other arrangements are made. This should be in addition to any contact with probation services. Where the party is engaging with children and/or adult services, contact with the relevant social worker should take place.

SECTION 5 – Safeguarding Organisational Structure and Responsibilities

The ethos behind the structure of the Methodist Church remains true to the original values of its founder, John Wesley: valuing consultation, shared decision-making and responsibility across the Connexion. An outline of the Church's structure can be found on our website:

www.methodist.org.uk/who-we-are/structure

In line with the values of cooperation and consultation, all members, employees, office holders and volunteer workers at all levels of church life play a significant role in implementing safeguarding procedures.

The Charity Commission and companies insuring the Church require all local bodies to have a safeguarding policy in place. Each district, circuit and local church will produce a Safeguarding policy, related to work with both children and adults. Model policies are provided in **Appendices 6a, 6b** and **6c** Model safeguarding policies. These should be reviewed annually and displayed.

It is important to recognise that it is people who protect – not just procedures. The aim is to create a culture of informed vigilance at all levels in the Church.

The Methodist Church as a connexion has an obligation to support churches and those working with children and adults in exercising their primary responsibility for those entrusted to them.

Based on the foundations above, the Methodist Church commits to the following key safeguarding roles and responsibilities:

5.1 Local church/circuit level

The Superintendent Minister and the Circuit Safeguarding Officer shall provide support and oversight for local churches and ministers in implementing safeguarding as stated above and ensure that activities with children and adults, both within the circuit and local churches, are provided according to good practice and safeguarding procedures.

Local churches and circuits may wish to join together to implement the policy and procedures, but it is important to remember that legal responsibility will continue to rest with the members of the Church Council. It should be noted that people working in isolated situations can be vulnerable and care should be taken to implement the policy in full.

It is recommended that the local church or circuit safeguarding officer be a member of the Church Council and Circuit Meeting or have the right to attend at least annually to report on implementation of the safeguarding policy. They should also have the right to attend the circuit staff meeting to discuss urgent confidential concerns and report to the circuit superintendent. For a model role description, please see **Appendices 7a** and **7b**.

5.2 District level

The Chair and the District Policy Committee must provide support and oversight for all ministers in implementing safeguarding policies and procedures in local churches and circuits.

In particular, each district must:

- provide a structure to manage safeguarding issues and practice with a suitably qualified and experienced multi-disciplinary district safeguarding group (DSG), including an independent Chair. The District Chair or their nominee shall be a member of the group and attend meetings regularly. The members of the group do not have to be members of the Methodist Church, but the majority of the team should be either Methodists or members of a church which is a member of Churches Together in Britain.
- support risk assessment work whether conducted locally or by the Connexion on individuals so that the Chair, the Director of Safeguarding or others can evaluate and manage any risk posed by individuals and their work or activities within the church.
- provide access to training and support on safeguarding matters to local churches, circuits and districts in collaboration with the training officers.

The DSO is responsible for advising and following through safeguarding concerns within the district, supported by the DSG.

The DSO has a professional background in work with children or adults (or both) and/or significant experience in this field. They are the main contact point within the district for all safeguarding matters and are supported through the Connexional Safeguarding Team. They work with colleagues from the Learning Network (LN) to ensure that core safeguarding training programmes are provided in order that all relevant church workers have the required training and support to deliver the Church's approach to safeguarding in all its work.

The District Safeguarding Group

- 1.1 Every District must have a safeguarding group (DSG) whose purpose is to assist and guide the effective implementation of the safeguarding policy across all churches and district activities. This will include supporting the District Chair in the dispensing of their safeguarding duties.
- 1.2 The membership should be made up of at least two members with a professional background in safeguarding such as police, probation, education, children's and/or adults' services, health and legal services. It should also include a minister with some experience of safeguarding. Good practice would additionally include at least one member with lived experience as a victim/survivor of church-based abuse to ensure that the perspectives and needs of this important group are taken into consideration. The DSO or another DSG member should offer them support as required to ensure their full participation is facilitated.

- 1.3 The group should meet a minimum three times a year in order to support the work of the DSO and advise on policy, practice and training developments within the district.
- 1.4 The DSG should develop an action plan to guide its work and provide activity data (e.g. implementation of training and church safeguarding policy compliance) to demonstrate implementation and improvement plans.
- 1.5 The DSG should report to the District Policy Committee on an annual basis (and at other times as required) in respect of its strategic role in developing safeguarding practice and ensuring that policy and training is being implemented. This will also demonstrate how the DSG is meeting the minimum standards ([Appendix 8](#)) set for DSGs.

There is no requirement for anyone coordinating and advising on safeguarding matters to be members of the Methodist Church. This gives scope for the most appropriate people, with relevant professional backgrounds, to be appointed especially when considering the appointment of an independent Chair of the DSG and the DSO.

5.3 Connexional Level: Director of Safeguarding and the Safeguarding Team

The Connexional Safeguarding Team, led by the Director of Safeguarding, undertakes support, investigation and development activities in relation to a broad remit of safeguarding areas working with Connexional Team members, the Methodist Conference and Methodist Council, DSGs, DSOs and district chairs.

Safeguarding Casework Supervisors (CWS) were introduced in September 2018 in order to further strengthen the provision of safeguarding support and guidance across the Connexion. They have a professional background and significant experience and skills in safeguarding and are managed by the Director of Safeguarding.

CWS support DSOs and provide face-to-face and telephone supervision. They support DSOs in the management of ongoing safeguarding concerns and give advice and guidance. CWSs cover particular districts.

CWSs commission and organise Connexional Risk Assessments. They coordinate and facilitate Safeguarding Panels and act as professional advisers. CWSs administer blemished DBS/PVG certificates and consider whether it is appropriate for clearance to be granted. They work with Ministers, Superintendents and District Chairs to ensure people are recruited safely.

As part of their role, CWSs contribute towards the development and review of safeguarding policies, procedures and guidance and have a specific lead area in safeguarding practice. They coordinate the collation of documentation for Subject Access Requests. In addition, CWSs provide consultation and training to those both internal and external to the Methodist Church to help support others and promote the church's commitment to safeguarding.

Current safeguarding best practice is promoted via an annual conference for professional development and networking, maintaining the safeguarding section of the Methodist Church website and oversight of Connexional safeguarding training strategies. The Safeguarding Policy Manager in the Connexional Safeguarding Team facilitates the development of safeguarding policies and procedures through consultation and partnership with the wider Church, the Connexional Team, relevant agencies and other voluntary sector organisations.

There is no requirement for anyone coordinating and advising on safeguarding matters to be members of the Methodist Church. This gives scope for the most appropriate people, with relevant professional backgrounds, to be appointed especially when considering the appointment of an independent Chair of the DSG and the DSO.

5.3.1 Diagram - Safeguarding Structure of the Methodist Church



5.4 Responsibilities of Charity Trustees

The responsibility for implementation lies with the relevant charity trustee body: the Church Council for a local church and Circuit Meeting for the circuit. It is the relevant trustee body, and the minister in pastoral charge or superintendent, who are responsible for ensuring that allegations are responded to immediately and according to the procedures of the Methodist Church including referral to the statutory authorities.

- Safeguarding good practice should be followed and pastoral care provided in all instances of child or adult abuse and trauma. This includes pastoral provision for the needs of survivors of abuse and careful ministry to those who pose a risk to children.
- Reports of abuse (including allegations) are referred to the statutory authorities according to Safeguarding Policies and Procedures and with reference to guidance provided in this document.

- Standing Orders and the Methodist Church Safer Recruitment Policy and Procedures are implemented by completing the required DBS checks.
- When somebody is being considered for an appointment to a role or responsibility to which Standing Order 010(3) applies or is already holding such a position and one of the following circumstances applies:
 - the person has a conviction or caution for an offence under the Sexual Offences Act (2003) is mentioned in Schedule 15 of the Criminal Justice Act (2003) **or is included in a list barring them from working with vulnerable adults or children held by the Disclosure Barring Service (DBS).**
 - the person has been subject to risk assessment under Standing Order 237 and as a result, the Safeguarding Committee deem that they present a significant risk of serious harm to children or vulnerable adults, the relevant permissions must be sought as provided for in Standing Order 010(5). See guidance in Book VI Part 1 of CPD.

In respect of these responsibilities, the Church Council or Circuit Meeting should also take advice from the DSO and/or the Connexional Safeguarding Team about:

- referring cases to the DBS or Disclosure Scotland where allegations lead to disciplinary action or someone resigns pending this. The DSO should make the referral.
- making a report to both the Charity Commission (in England and Wales) or **OSCR (in Scotland)** and the relevant insurance company in respect of serious safeguarding matters.
- notifying the Conference Officer for Legal and Constitutional Practice for further advice.

5.5 Training Requirements

All staff working with children and adults are required to attend Creating Safer Space training as follows:

- Foundation Module 2020 Edition.
- Advanced Module 2019 Edition.

Records of attendance should be maintained as follows:

- Foundation Module: at both circuit and district level.
- Advanced Module: at district level.

The 2016 Methodist Conference decided that from September 2017, renewal of training will be done every four years. This is to reflect the pace of change in safeguarding. Full details of training requirements are at Appendix 9.

Failure to attend required training

The Church provides free safeguarding training for all those in applicable roles to ensure that they have an opportunity to build confidence and knowledge about safe practice. It is expected that those attending courses will engage positively and actively in order to maximise their benefit from the course. Where attendance at Foundation or Advanced Module courses is required for a specific role, this is outlined clearly at [Appendix 9](#) as part of this policy, which has been approved by Methodist Council. Where there is a refusal to attend, each situation will be considered individually and every effort made to identify any issues or support needs that may be affecting the person's ability to participate. In the event that matters cannot be resolved, the following steps may be undertaken:

- contact from a local minister to explore how a resolution can be found, to consider any related issues and to try to remove obstacles
- advice about the requirements and the necessity for the training from the DSO
- a referral for further consideration and action by the district chair and/or the Safeguarding Director of the Methodist Church
- suspension from role, responsibilities or function
- a formal complaint under Part 11 of CPD
- a disciplinary procedure with a potential for removal from role, membership or full Connexion, as applicable.

5.6 Church Schools

The Methodist Church oversees a family of over 80 schools in both the state and independent sectors. For the sixty-six schools in the state sector, the Methodist Council exercises appropriate oversight for Methodist-only schools. For Anglican-Methodist schools, oversight is shared with the relevant diocese of the Church of England. The Council's oversight in all cases is delegated to the Methodist Academies and Schools Trust (MAST). The MAST schools are considered as part of the mission of the local circuit with a close relationship through the school governors.

In relation to safeguarding, these schools are bound by the policies and procedures of the relevant local authority and are inspected by Ofsted. Those that form part of an academy trust have their own safeguarding policies for which their trust is responsible, and they too are subject to Ofsted inspection.

The MAST schools may deal with safeguarding matters independently of the Church, based on the requirements of their policies and procedures. Where any issue involves a member of the Methodist Church working within that school, close cooperation will be undertaken with the Connexional Safeguarding Team, the district (via the chair and DSO) and the Conference Office.

Where a safeguarding concerns is raised in respect of a MAST school this should primarily be directed to the headteacher of the school. If a superintendent or minister with pastoral

responsibility becomes aware of a safeguarding issue relating to a Methodist member who is involved in any way in a school, they should consult their DSO at the earliest opportunity. Following this, contact should be made with the headteacher and MAST should be informed.

Methodist independent schools are under the overall supervision of the Methodist Independent Schools Trust (MIST). They have their own safeguarding policies, which draw upon national guidance for education and/or local guidelines, dependent on the individual oversight arrangements for each school. The safeguarding procedures and policies of these schools have to conform to statutory requirements (e.g. *Keeping Children Safe in Education* - KCSIE); the schools work closely with the local safeguarding children boards (LSCB) and are subject to routine inspection under arrangements approved by the Department for Education (DfE) and administered by the Independent Schools Inspectorate (ISI).

The independent schools may deal with safeguarding matters internally based on their policies and procedures. Where any issue involves a member of the Methodist Church working within that school, close cooperation will be undertaken with the Connexional Safeguarding Team, the relevant Methodist district (via the chair and DSO) and the Conference Office. DSOs may be invited by independent schools in their areas or via MIST to support the development of safeguarding practice. The district chair is an ex-officio governor of any MIST school in their district.

In the first instance, safeguarding concerns relating to Methodist independent schools should be reported to the headteacher of the school or to MIST's General Secretary.

5.7 Methodist Homes

MHA is a charity providing care, accommodation and support services for more than 16,000 older people throughout Britain. MHA is a group structure comprising the charity, Methodist Homes, the Methodist Homes Housing Association and MHA Auchlochan.

Methodist Homes Group is regulated by the guidelines and requirements of the Care Quality Commission (England), the Care Inspectorate (Scotland) and the Care and Social Services Inspectorate (Wales). It has a common policy relating to safeguarding for all its homes and schemes, which has been drawn up in line with each of the regulators' requirements.

The Connexional Safeguarding Team and Methodist Homes will work in close cooperation where a safeguarding issue arises and the subject of that concern is a member of the Methodist Church. Safeguarding concerns relating to Methodist Homes should be reported in the first instance to the manager of the home in question. The Director of Quality oversees safeguarding and issues are centrally monitored and reviewed by the charity's quality committee.

SECTION 6 – PRACTICE GUIDANCE

Definitions, terminology and recognising abuse: This section provides guidance on some of the key definitions and terminology used for safeguarding children and adults throughout the procedures. It is not an exhaustive list and if you are unsure what something means you should always check with a safeguarding professional.

6.1 Definitions of Key Terms when Safeguarding Children

Child

Anyone who has not yet reached their eighteenth birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, a member of the armed forces, in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection. *Working Together to Safeguard Children 2018.*

Safeguarding and promoting the welfare of children

Defined for the purposes of this guidance as:

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

Working Together to Safeguard Children 2018

Child protection

Activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. *Working Together to Safeguard Children 2018*

Harm and significant harm

'Harm' means ill-treatment or impairment of health and development. 'Significant harm' is the threshold that justifies compulsory intervention in family life in the best interests of the children and is based on comparing the child's health and development to that which could be reasonably expected of a child of a similar age. *Children Act 1989 and 2004; the Adoption and Children Act 2002*

6.1.1 Definitions of abuse

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. *Working Together to Safeguard Children 2018*

Emotional abuse

The persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, including interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. *Working Together to Safeguard Children 2018*

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. *Working Together to Safeguard Children 2018*

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child Criminal Exploitation (CCE)

Child criminal exploitation is commonly associated with county lines criminal activity. It often (but not exclusively) involves adult gang members taking advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into criminal

activity such as drug-related crime. The victim may have been groomed into criminality therefore, they may appear to have given consent to be involved, but it can still be the victim of exploitation. Like sexual exploitation, CCE does not always take place in person and can occur through the use of technology. Criminal exploitation of children also includes children engaged in forced labour or to commit theft. For more information see:

[Criminal Exploitation of children and vulnerable adults: County Lines guidance \(publishing.service.gov.uk\)](#)
[Criminal exploitation and gangs | NSPCC](#)

Adverse Childhood Experiences (ACEs)

The term Adverse Childhood Experiences (ACEs) refers to traumatic events that occur in childhood and/or adolescence. As with other forms of abuse, ACEs can be a single event or, occur repeatedly over a period of time creating prolonged threats to the safety and wellbeing of a child's physical, sexual, emotional, psychological and mental health needs.

Examples of ACEs include:

- Physical, sexual, emotional abuse
- Neglect
- Living with someone who is alcohol / drugs dependent
- Witnessing domestic abuse
- Living with someone with serious mental illness
- Losing a parent through divorce, death or abandonment

The impact of experiencing ACEs can have a detrimental effect on the future physical and mental health of a child, and become a barrier to a healthy adult life. Research shows that it increases the risk of mental ill-health, violence in adult relationships and post-traumatic stress to name a few.

Therefore, it is vital to support those who come forward who disclose ACEs. For further information: [Adverse Childhood Experiences \(ACEs\) and Attachment - Royal Manchester Children's Hospital \(mft.nhs.uk\)](#)

Domestic abuse

The government definition describes domestic violence and abuse as:

'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.' It also states that this includes (but is not limited to) sexual, psychological, physical, financial and emotional abuse; 'honour' based violence; female genital mutilation (FGM); and, forced marriage.

Controlling behaviour subjugates the victim by taking away their access to support and resources (often their own) resulting in a lack of independence and an over-regulation of their day-to-day lives

often eroding their capacity to make any decisions in respect of themselves. Coercion refers to deliberate acts of assault and threatening behaviour that humiliates and intimidates the victim often in agreeing to things they do not wish to engage or comply with. It is important to be clear that domestic abuse can affect anyone regardless of sexuality, gender or age.

Spiritual abuse

Coercion and control of one individual by another in a spiritual context. The target experiences spiritual abuse as a deeply personal attack. This may include manipulation and exploitation, enforced accountability, censorship of decision-making, requirements for secrecy and silence, pressure to conform, misuse of Scripture or the pulpit to control behaviour, requirement of obedience to the abuser, the suggestion that the abuser has a 'divine' position, isolation from others, especially those external to the abusive context. *Lisa Oakley and Kathryn Kimmond, 2014, Journal of Adult Protection*

Abuse using social media

Online abuse and any type of abuse that happens on the web including, social media, smart/Android mobile phones, tablets, online gaming among others. Children and young people may experience cyber bullying, grooming, sexual abuse, sexual exploitation or emotional abuse online. Even if there is no physical contact, abuse can still take place whether that is by someone a child/young person knows or, by a stranger who may have attempted to befriend them virtually.

[Online abuse | NSPCC](#)

Child trafficking

The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in human beings". *Council of Europe, ratified by the UK Government in 2008 (See also Human Trafficking)*

6.1.2 Possible indicators of abuse – children

Identifying abuse is not easy, and the indicators given here are examples only. Some of the indicators can occur in more than one type of abuse and it must be borne in mind that there can sometimes be other non-abusive explanations. However, they may alert you to the need to be aware of the possibility of abuse, to be observant and to record any concerns. If in doubt, you should always seek advice from a safeguarding professional.

Physical

- bruising in unusual places, patterns or shapes
- burns and scalds, especially in significant shapes (e.g. iron or cigarette end)
- adult human bite marks
- serious injury where there is a lack of, or an inconsistent explanation
- untreated injuries

- unusual fractures.

Children may be:

- unusually fearful with adults
- unnaturally compliant with their parents/ carers
- wearing clothes that cover up their arms and legs
- reluctant to talk about or refuse to discuss any injuries, or fearful of medical help
- aggressive towards others.

Emotional

Children may:

- present with extreme behaviours
- be overactive or withdrawn
- demonstrate anxiety e.g. rocking, hair-twisting or thumb sucking
- lack confidence or self-worth
- lack concentration
- self-harm
- engage in substance misuse
- have frequent periods of going missing / running away
- reluctance to go home
- have sleep / eating disorders
- have difficulty trusting adults or, very anxious
- have poor school attendance
- social isolation
- aggressive towards others

Neglect

Indicators may include:

- poor personal hygiene and presentation e.g. unkempt clothing unclean and ill-fitting
- untreated medical needs / conditions
- failure to thrive
- children who are constantly hungry and frequently tired
- poor concentration
- developmental delay
- frequent accidents and/or accidental
- low self-esteem
- injuries
- social isolation
- eating disorders

- poor skin tone and hair tone
- begging and stealing

Sexual abuse

- Changes in behaviour – a child may start being aggressive, withdrawn, clingy, have difficulties sleeping or start wetting the bed.
- Avoiding the abuser – the child may dislike or seem afraid of a particular person and try to avoid spending time alone with them.
- Sexually inappropriate behaviour – or sexually explicit language.
- Physical problems – health problems, including soreness in the genital and anal areas or sexually transmitted infections, or pregnancy.
- Problems at school – an abused child may have difficulty concentrating and learning and their grades may start to drop.
- Giving clues – children may also drop hints and clues that the abuse is happening without revealing it outright.

6.2 Definitions of Key Terms when Safeguarding Adults

Adult safeguarding is working with adults with care and support needs to keep them safe from abuse or neglect. It is aimed at people with care and support needs who may be in vulnerable circumstances and at risk of abuse or neglect.

6.2.1 Safeguarding definitions

The Care Act 2014 states that safeguarding duties apply to an adult, aged 18 years or over, who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing or at risk of abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of or the experience of abuse or neglect.

While the term “vulnerable adult” is not used in the statutory sector since the introduction of the Care Act 2014, the Methodist Church continues to use the term in recognition that any person can be vulnerable and therefore in need of support at any time. In Scotland, a Protected Adult is an individual aged 16 or above who is receiving certain types of services. There are four categories of services specified in the Protection of Vulnerable Groups Act (PVG Act): A support service; a care home service; a housing support service; and/or, an adult placement service.

In order to bring into focus those adults for whom the Church should have a particular care, the Methodist Church has adopted the definition used by Thirtyone:Eight :

Any adult aged 18 or over who, due to disability, mental function, age or illness or traumatic circumstances, may not be able to take care or protect themselves against the risk of significant harm, abuse, bullying, harassment, mistreatment or exploitation.

Although everyone is vulnerable in some way and at certain times, some people by reason of their physical or social circumstances have higher levels of vulnerability than others. Some of the factors which increase vulnerability are:

- a sensory or physical disability or impairment or a learning disability
- a physical illness
- mental ill health (including dementia), chronic or acute
- addiction to alcohol or drugs
- failing faculties in old age
- a permanent or temporary reduction in physical, mental or emotional capacity brought about by life events, for example bereavement or previous abuse or trauma.

It is important to remember that:

- vulnerability is often not a permanent state
- vulnerability is not always visible
- a person with apparently visible vulnerabilities may not perceive themselves as such
- anyone can be vulnerable at different stages of life
- vulnerable people may also pose risk and cause harm.

Refugees and asylum seekers will meet this definition of vulnerability by virtue of their circumstances.

6.2.2 Abuse definitions

Physical abuse

The non-accidental infliction of physical force, which results in pain, injury or impairment. This may include hitting, assault, slapping, pushing, pinching, kicking, hair-pulling, punching, forcing someone, inappropriate restraint, physical sanction, incorrect moving or handling technique which cause distress, isolation, confinement, avoidable deterioration of health, misuse of prescribed medication. *Care and Support Statutory Guidance, Issued under the Care Act 2014 (Department of Health)*

Sexual abuse

The involvement of an adult with care and support needs in sexual activities or relationships without informed or valid consent. This may involve offensive or inappropriate language (including sexual innuendo and sexual teasing), inappropriate looking, inflicting pornography on an individual, inappropriate touching, masturbation in public, indecent exposure, coercion into an activity, rape or sexual assault, photography, online and social media abuse.

Psychological/emotional abuse

Behaviour that has a harmful effect on an adult's emotional health or development. This can include:

- scolding or treating like a child;
- making a person feel ashamed of involuntary behaviour;
- blaming someone for attitudes or actions or events beyond their control;
- use of silence, humiliation, bullying, harassment and verbal abuse intimidation;
- controlling behaviour or efforts to create overdependence;
- lack of privacy or dignity;
- deprivation of social contact;
- threats to withdraw help and support;
- denial of cultural and spiritual needs; and,
- denial of choice or failing to respond to emotional needs.

Financial / Material abuse

The denial of access of the individual to money, property, possessions, valuables or inheritance, or improper use of funds by omission, exploitation or extortion through threats. Although financial abuse can occur in isolation, where other forms of abuse occur, financial abuse is also likely. *Care and Support Statutory Guidance, Issued under the Care Act 2014 (Department of Health)* This includes misuse, embezzlement or theft, or misappropriation of a person's money, property, possessions or benefits. Also, refusing a person access to their own money, property or possessions, failing to account properly for money, property or possessions or applying pressure in connection to wills, property and inheritance, or applying duress to a person in order to secure a loan.

Neglect and acts of omission

The repeated withholding of adequate care which results in the adult's basic needs not being met. It can be intentional or unintentional and includes acts of omission. This may include denial of educational, social, religious, cultural or recreational needs, lack of adequate heating, lighting, food or fluids. Also the inappropriate use of medication, lack of attention to hygiene, toe and fingernails or teeth.

Self-neglect

Self-neglect refers to omitting to care for one's personal hygiene, health or environment. For examples:

- Not meeting basic needs, including personal hygiene and appropriate clothing.
- Neglecting to seek help for medical matters.
- Not attending to living conditions – letting rubbish accumulate in the garden, or dirt to accumulate in the house.

- Hoarding items or animals.

Action to address neglect in adulthood has to be balanced with an individual's wish to make decisions for themselves (Liberty Protection Safeguards).

Discriminatory abuse

This occurs when values, beliefs or culture result in the misuse of power that denies opportunities to some individuals or groups based on the nine protected characteristics listed on the Equality Act 2010.

Additional areas of abuse identified and recognised by the Methodist Church include:

Institutional abuse

This includes neglect and poor practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in one's home. This may range from one-off incidents to ongoing ill treatment. It can be through neglect or poor professional practice or a result of the structure, policies, processes and practices within an organisation. *Care and Support Statutory Guidance, Issued under the Care Act 2014 (Department of Health)*

Spiritual abuse

Coercion and control of one individual by another in a spiritual context. The target experiences spiritual abuse as a deeply personal attack. This abuse may include manipulation and exploitation, enforced accountability, censorship of decision-making, requirements for secrecy and silence, pressure to conform, misuse of Scripture or the pulpit to control behaviour, requirement of obedience to the abuser, the suggestion that the abuser has a 'divine' position, isolation from others, especially those external to the abusive context'. *Oakley and Kinmond (2014) Journal of Adult Protection 16.2*

Human trafficking

Human trafficking is described as 'the process of trapping people through the use of violence, deception or coercion and exploiting them for financial or personal gain' ([What is human trafficking? - Anti-Slavery International \(antislavery.org\)](#)). People who are trafficked are usually vulnerable because of the risks they are willing to take to escape poverty, discrimination and/or persecution.

Modern slavery

Modern slavery is the severe exploitation of usually vulnerable people for financial or personal gain. It is a relationship that sees a person or persons coerced into providing labour or a service for no financial or other form of recompense resulting in economic exploitation.

Abuse using social media and/or mobile phones

Includes communications that seek to intimidate, control, manipulate, put down, falsely discredit or humiliate the recipient. It may also include threatening a person's earnings, employment, reputation or safety, and sexting.

6.2.3 Possible indicators of abuse in adults

As with children, this is not a definitive list of indicators but rather some examples of what may be observed. Some indicators occur across the categories and not all categories are covered here.

In some of the examples below the action is a clear form of abuse:

Physical

- a history of unexplained falls
- dehydration and/or malnutrition
- loss of weight
- a vulnerable person telling you they have been hit, slapped, kicked or mistreated
- unexplained bruises or untreated restrained injuries in various stages of healing
- injuries reflecting the shape of an object
- injuries inconsistent with the lifestyle
- poor skin condition or poor skin hygiene
- broken spectacles/frames
- varicose ulcers or pressure sores without illness-related cause
- unexplained burns, rope burns or cigarette burns
- physical indicators of being subjected to punishment

Emotional

- an adult being scolded or blamed for actions beyond their control
- Infantilisation or treated like a child
- Humiliation
- verbal abuse
- controlling or over-dependence
- lack of privacy and dignity
- making a person feel ashamed of involuntary behaviour
- controlling or over-dependence
- denying of choice
- bullying/harassment
- threats to withdraw help and support
- denying of cultural and spiritual needs

Neglect

- clothing which is inadequate or in poor condition
- an untreated medical condition
- poor hygiene and cleanliness
- verbal abuse
- health and safety hazards in the environment
- evidence of sores, varicose ulcers, pressure sores
- weight loss
- poor physical condition e.g. rashes, unclean
- bullying/harassment
- persistent hunger and/or dehydration

Self-neglect

- dehydration, malnutrition (or obesity), untreated medical conditions, poor personal hygiene
- unsanitary living quarters e.g. animal/insect infestation, no functioning toilet, excrement present
- grossly inadequate housing or homelessness
- hazardous living conditions e.g. improper wiring, no indoor plumbing, no heat or running water
- inappropriate and/or inadequate clothing, lack of necessary medical aids e.g. glasses, hearing aids, dentures

Sexual abuse

- a significant change in sexual behaviour or sexually implicit/explicit behaviour
- an untreated medical condition
- poor hygiene and cleanliness
- verbal abuse
- health and safety hazards in the environment
- a vulnerable person telling you they have been sexually assaulted or raped.
- weight loss
- persistent hunger and/or dehydration
- bullying/harassment
- poor physical condition e.g. rashes, unclean

Institutional abuse

- lack of flexibility or choice
- a culture of treating everyone using the service as 'the same' opposed to 'equal'
- inappropriate or poor care
- no opportunity for snacks or drinks
- inadequate staffing levels
- failure to promote or support a person's spiritual or cultural beliefs
- dehumanising language
- absence of individual care

Spiritual abuse

- a sense of betrayal leading to distrust
- feeling misunderstood and self-isolation
- change / damaged view of the Church
- silencing by their abuser and powerlessness
- loss of church as safe space
- long-term distress

Domestic abuse

- frequent absences from work or other commitments
- unexplained bruises or injuries
- panic attacks
- anxious about being out or rushes away
- wears clothes that conceal bruises even on warm days
- stops talking about partner
- always accompanied by partner
- isolated, withdrawing from friends and family

Human trafficking and modern slavery

- Trauma
- Seems to be bonded by a debt
- Complex medical, emotional, mental and practical needs
- Previous history of being trafficked
- Unable to negotiate working conditions or leave their employment
- May look malnourished, lacking access to medical care, hygiene facilities and education
- Apparent high resilience masking trauma
- May appear unfamiliar with their neighbourhood
- Reluctant to seek help or to trust others
- Appears to be in a dependency situation
- Anger and post-traumatic altruism
- Experiences threats against themselves or family members
- Expressing of anxiety, fear or mistrust
- Travel, identity, financial documents are held by someone else
- On low pay or have excessive deductions made for food, accommodation, transport
- Unsure of home/work address
- May appear unkempt or wear same clothes day in and day out
- Untreated injuries or medical conditions

6.3 The Care Act (2014) and Statutory Guidance

Legislation defines the aims of adult safeguarding as:

- prevent harm and reduce the risk of abuse and neglect to adults with care and support needs
- safeguard adults in a way that supports them in making choices and having control about how they want to live
- promote and approach that improves life for the adult concerned
- stops abuse and neglect where possible through prevention, identification and response.
- provides information and support in an accessible manner so that people understand different forms of abuse.

The Care Act identifies gives six key principles that underpin all adult safeguarding work:

Empowerment - People being supported and encouraged to make their own decisions and informed consent

Prevention - It is better to take action before harm occurs

Proportionality - The least intrusive response appropriate to the risk presented

Protection - Support and representation for those in greatest need

Partnership - Local solutions through services working with the communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse

Accountability - Transparency in delivering safeguarding

For more information see www.gov.uk/government/publications/careactstatutory-guidance/care-and-support-statutory-guidance

6.3.1 Guidance on capacity

The concept of capacity is important and must be applied in certain contexts to assess whether an individual is able to make a specific decision at a particular time. By law, all adults are presumed to have capacity to make decisions about themselves unless an assessment illustrates otherwise. Those who work with them should make every reasonable endeavour to obtain the decision from the adult. It is best to seek guidance from Adult Social Care services about defining a person's mental capacity if there is concern about their ability to understand safeguarding processes.

6.4 Additional guidelines for group leaders who work with adults and/or children and young people

The provision of a service whether that is small or large or involving paid employees or volunteer, the provider must take reasonable steps to ensure the safety of those using the service. At the very least, the group leader should:

- ensure that health and safety requirements are understood and adhered to (*e.g. the suitability of the setting for the activity planned, where the first aid kit is and who are the trained first-aiders, where the fire exits are*)
- undertake risk assessments, take appropriate action, and record it
- keep the register² (where required) and consent forms up to date (*including emergency contact details for participants*)
- liaise with safeguarding officer over good practice for safeguarding
- inform the safeguarding officer of any specific safeguarding concerns that arise (the safeguarding officer will liaise with the DSO)
- liaise with the Church Council/Circuit Meeting
- ensure that relevant privacy notices have been supplied where data is being processed.

For further information on the safety of children in out-of-school settings please view the government's non-statutory guidance [here](#).

6.5 Activity risk assessments

While the Church recognises that it is not possible to avoid all risk when working with vulnerable groups, it is possible to try and minimise those risks. This can be achieved through careful planning and preparation and by providing a written record of the thought processes and action taken. Activity risk assessments should be undertaken before any activity takes place, approved by the event leader/minister and retained securely in case they need to be seen at a later date (e.g. as a result of an accident taking place).

Activity risk assessments should include, but is not limited to:

- the nature of the activity
- the location
- transport needed and associated issues (e.g. insurance)

² For guidance on retention of this information please see: [Updated Retention Schedule and other new Data Protection Resources – June 2021 - Trustees for Methodist Church Purposes \(tmcp.org.uk\)](#)

- staffing levels/gender
- experience of staff
- ages of the group attending, abilities, special needs
- medical and health needs of the group/individuals within it
- emergency planning
- identified risks
- action(s) needed to address the risk and by whom.

6.6 Hire or use of Methodist Church premises

Many churches own buildings, which they hire out to community groups and others. Some of these undertake work with children. The observance of 'reasonable care' by both parties is a standard insurance condition. The hiring body (the organisation hiring the premises) 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, and must carry full liability insurance for this.

For both one-off and regular hiring, it is recommended that a written hiring agreement be used. Please refer to the [TMCP website](#) for further information and hiring agreements. If the hiring body is required to register with Ofsted, the church should ask to see the registration certificate and record that it has been seen.

Church Councils are required to ensure that those who use their premises under licence or who hire the premises for regular or occasional use are given a copy of the local church safeguarding policy and declare their willingness to comply with the safeguarding policy of the Methodist Church or equivalent procedures (such as Scouting and Guiding national safeguarding policy). This should be documented and recorded for clarity in the event that a safeguarding concern is identified (see [Appendix 10](#)).

6.7 Activities in a private dwelling

Where the activity takes place in someone's home, the owner should consider the health and safety and fire safety risks and the duties to those attending. For example, the owner should have appropriate fire precautions in place and a first aid kit. As the user, you will be responsible for managing risks and should seek support from the group leader (if that is not the home owner) for identifying and making clear the health and safety and safeguarding arrangements according to the activity and individuals attending. Participants should be clear about who the identified lead is and how to report concerns should any arise.

6.8 Safeguarding children and young people online

The internet is constantly evolving and changing, and the Methodist Church recognises the benefits it brings of promoting opportunities for children and young people to engage in the life of the Church in a way that can be inclusive of all regardless of background and/or ability. However, the internet has also been the source of harm to children and young people and others vulnerable to harm and exploitation therefore, every care should be taken to minimise the risks it presents.

Those working with children and young people are strongly advised to follow the guidance set out below:

- When posting activity ideas for children or young people, ensure they comply with good safeguarding practice.
- Ensure that parents or carers are aware of what their children or young people are doing and have given their written permission in advance.
- Children and young people should be regularly informed and reminded of safe internet use and accessing social media. They must be encouraged to access websites such as NSPCC or ChildLine or talk to an adult if they have any concerns or fears.
- Warn children and young people about the dangers of giving out personal details on the internet.
- When demonstrations are being given, plan beforehand to ensure that all websites visited have material that is appropriate for the age group taking part.
- Use child-friendly search engines when asking children and young people to undertake their own searches on the internet. See [Search Engine Watch](#) for a list of other child-friendly search engines.
- Where children and young people are encouraged to undertake subsequent searches on the internet at home, they must only do so with the knowledge of their parent or carer.
- Encourage children and young people to obtain parental consent if they wish to develop internet friends into face-to-face friendships. Even then, they should always be accompanied on any first meeting.

6.8.1 Digital images and the use of photographs/recordings online

Photography and video footage are important ways of recording Methodist activity and illustrating important moments in people's lives and the life of our Church. However, we must respect the rights of everyone to choose whether or not to be photographed or recorded. As a guide to good practice, please see the list below:

- Do not use children's names in photograph captions. If a child is named, do not use the image without written permission as images accompanied by personal information, such as the name of a child could be used to learn more about a child before grooming them for abuse.
- Only use images of children in suitable clothing to reduce the risk of inappropriate use. Some activities, for example swimming and drama, present a much greater risk of potential misuse.
- For professional photographers or the press invited to an event, state in writing what you expect from them in relation to child protection.
- Do not allow photographers unsupervised access to children or approve photography sessions outside the event or at a child's home.

6.8.2 Consent for use of images

While the Church recognises that many sixteen to seventeen years-olds have significant responsibility for key decisions in their lives, in most circumstances, parents have a legal responsibility for their children up to the age of eighteen. If, after assessment of the young person's individual circumstances, a decision is made that it may not be appropriate for consent to be obtained by their parents, this should be discussed with a safeguarding officer. There may also be circumstances known to the legal parent or guardian relating to the use of images of which the young person is unaware. Therefore, if a decision is taken that a consent form is not required, parents must still be informed of the consent given by the young person in relation to photographs and images. This approach is in line with current NSPCC guidance.

Table 1

Age of child or young person	Consent required
0-11 years	Parent or carer
12-17 years	Parent or carer and young person
16-17 years, living independently or estranged from parents	young person & social worker, youth worker or appropriate adult

SECTION 7 - INFORMATION SHARING

Working Together to Safeguard Children 2018 states that sharing information is an intrinsic part of safeguarding and the decision about what to share and when can have a huge impact on individuals' lives. The early sharing of information is the key to providing effective early help where there are emerging problems and at the other end of the scale can be essential in putting in place effective child protection services.

Safeguarding professionals should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children and young people. This should occur whether the problems are first emerging or, if the child/ren are in receipt of a local authority intervention. Everyone has a duty to share information about any adults or circumstances that may affect a child/young person's safety or welfare. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children, which must always be the paramount concern. (*Working Together 2018* and *HMG Information Sharing for Practitioners 2018*). Likewise, any information that indicates an adult's safety or wellbeing is a concern, must also be shared with the relevant agencies at the earliest opportunity.

7.1 The Seven Golden Rules of Information Sharing

The advice provided in government guidance provides a useful reference tool:

1. General Data Protection Regulation (GDPR), Data Protection Act 2018 and Human Rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear about the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being. Base your information-sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not.
8. If you decide to share, then record what you have shared, with whom and for what purpose.

For further guidance on the principles of when, how and what to record when sharing information, please see [Appendix 4](#) and, for an Information Sharing Agreement Template, see [Appendix 11](#). Further guidance is also offered in Appendix 12 on responding to requests received from the Police Service to share information.

7.1.1 Confidentiality

If any person in the church has reason to believe that a child or adult is at risk of harm, the procedures set out in Section 4 of this document must be followed.

There are often occasions when someone may wish to share information of concern 'in confidence'. In such situations, it is important not to promise total confidentiality but explain what needs to happen according to the procedures outlined in Methodist Church policy.

Confidentiality is often confused with secrecy and a request to remain anonymous when reporting. Anonymity can be agreed if the information is coming from a church member and is being passed on to the statutory agencies through the safeguarding officer or DSO, but only with their agreement and in agreement with the statutory agency. Total anonymity cannot be agreed as the incident may result in criminal proceedings. Individuals with a formal role in the Church for example, a minister or a safeguarding officer cannot raise concerns anonymously.

7.1.2 Pastoral conversations and confidentiality

Relevant information may be disclosed in the context of a pastoral conversation. The Methodist Church does not have authorised liturgies for the sacraments of individual confession and the Service of Reconciliation. A minister is not prevented from disclosing details of any crime or offence, which is revealed in the course of a pastoral conversation or a confession within that context. The requirements regarding information sharing as outlined above apply.

Wherever possible, ministers and others engaged in pastoral conversations on behalf of the Church should explain the limits of confidentiality in pastoral relationships. Ideally, this should occur at the beginning of a pastoral relationship or meeting. A similar approach should be adopted for spiritual direction and formal supervision or mentoring arrangements conducted on behalf of or by officers of the Church.

Ministers should be aware that convicted offenders can sometimes come forward with new information. There is no bar in law to prevent ministers passing on such information to the authorities.

APPENDICES



APPENDIX 1 – ANTI-BULLYING POLICY

BULLYING, HARASSMENT AND SAFEGUARDING

The Methodist Church offers a warm welcome to everyone and strives to be a safer place for all where all forms of bullying and harassment will not be tolerated.

Policy Statement

Bullying and harassment are unacceptable and never excusable. The Methodist Church holds that all forms of bullying and harassment are unacceptable, inconsistent and incompatible with the Christian faith and a Christian way of living. The Methodist Church is committed to being a safer space for all. This means ensuring that members of the Methodist Church have an understanding and awareness of harassment and bullying and know how to respond appropriately, and that there are processes in place to enable the issues to be addressed. Victims of bullying or harassment can expect to be listened to, taken seriously and supported when they disclose that they are subject to bullying or harassment. Local Churches can receive advice and support from their Church/Circuit Safeguarding Officer and the District Safeguarding Officer.

Definition of Bullying and Harassment

There is no single definition of bullying. The Advisory, Conciliation and Arbitration Service (ACAS) state that bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying or harassment may be carried out by an individual against an individual (perhaps by someone in a position of authority) or involve groups of people. It may be obvious, or it may be insidious. Whatever form it takes, it is unwarranted and unwelcome to the individual.

The Methodist Church offers this definition as follows:

Any behaviour, always involving a misuse of power, which an individual or group knows, or ought reasonably to know, could have the potential effect of offending, humiliating, intimidating or isolating an individual or group should be regarded as unacceptable.

'Unacceptable behaviour' changes its label to 'bullying' or 'harassing behaviour' when it causes actual harm or distress to the target(s), normally, but not exclusively, after a series of incidents over a prolonged period of time.

Lack of intent does not diminish, excuse or negate the impact on the target or the distress caused. The degree of intent is only relevant in terms of how the behaviour should be challenged and the issues subsequently resolved. (Positive Working Together - A Short Guide 2015)

Harassment refers to poor treatment related to a protected characteristic (ACAS 2020). These are as follows:

- age
- sex
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sexual orientation

While bullying itself is not against the law, harassment is. It is against the law to discriminate against someone on any of the above grounds under the Equality Act (2010). You are also protected from discrimination if:

- you are associated with someone who has a protected characteristic, for example a family member or friend
- you have complained about discrimination or supported someone else's claim

Bullying and harassment is behaviour that makes someone feel intimidated or offended (*Workplace bullying and harassment - GOV.UK 2020*). These terms are often used interchangeably and some definitions include bullying as a form of harassment.

Safeguarding

Safeguarding is the action the Methodist Church takes to promote a safer culture. This means we will:

- promote the welfare of children, young people and adults
- work to prevent abuse from occurring
- seek to protect and respond well to those that have been abused

The aim of the Methodist Church's [Safeguarding Policy, Procedures and Guidance](#) is to 'create Christian communities of love and care, where good practice to promote the welfare of children, young people and adults becomes a way of life.'

Types of Bullying

There are different types of bullying and some can be covert and therefore more difficult to spot, but others more obvious and therefore easier to identify. It is helpful to split these in to different categories:

Physical Bullying

This can include hitting, kicking, tripping, pinching, pushing or damaging property.

Verbal Bullying

This can include name-calling, insults, snide remarks, teasing, intimidation, homophobic or racist remarks, or verbal abuse.

Social Bullying

This form of bullying can take many forms such as the following:

- Lying and spreading rumours
- Negative facial or physical gestures, menacing or contemptuous looks
- Playing nasty jokes to embarrass and humiliate
- Mimicking unkindly
- Encouraging others to social exclude someone
- Damaging someone's social reputation or social acceptance.

Cyber Bullying

This can happen at any time and be in public or in private and consist of the following:

- abusive or hurtful texts, emails or posts, images or videos
- deliberately excluding others online
- nasty gossip or rumours

- imitating others online or using their log-in.

Bullying and harassment can happen:

- face-to-face
- via a third party instigating by the 'primary' bully
- by letter
- by email
- via any digital platform
- by phone (mobile or landline).

What is not bullying:

- single episodes of social rejection or dislike
- single episode acts of nastiness or spite
- random acts of aggression or intimidation
- mutual arguments, disagreements or fights.

These actions can cause great distress, but do not fit the definition of bullying unless someone is deliberately and repeatedly doing them (National Centre for Bullying 2020). The Methodist Church does have systems in place to deal with those within the church who are perpetrators of bullying or harassment. The Complaints and Discipline process is one route, but this does not apply to those who are not members of the Methodist Church. To help ensure any allegations of bullying or harassment are dealt with in a timely, sensitive and comprehensive manner and that pastoral care for the victim is prioritized the procedures for any allegation or complaint are detailed in the flow chart (see appendix).

SUPPORT ORGANISATIONS

Bullying UK <https://www.bullying.co.uk> (A leading charity providing advice and support to anyone affected by bullying).

Support and advice for anyone who needs help: National Bullying Helpline **0845 22 55 787**

<https://www.nationalbullyinghelpline.co.uk/>

APPENDIX 2 – SAFER WORKING PRACTICES WHEN MANAGING CHILDREN'S ACTIVITIES

1. Staffing levels

It is the responsibility of the group leader to consider individual circumstances and arrange sufficient supervision to ensure the safety and effective management of all activities.

The following issues must be considered when determining appropriate numbers of helpers:

- the gender of the group – if mixed, then staff members should also be mixed, where possible
- the duration of the activity
- the competence and experience of the staff providing oversight and support
- the age of the group – staff should have the appropriate skills for the age they are working with
- children with additional support needs, such as physical disabilities, behavioural or mental health problems – extra staff may be necessary
- the *size* and layout of the room or outdoor area and any particular issues that may be relevant to that location.
- young people attending who are being encouraged to develop their leadership skills through helping. **They** should always be overseen by an appointed worker who will be responsible for ensuring that good practice and safeguarding procedures are followed and the work they are doing is appropriate to both their age and understanding. Only those over 18 can be counted as part of the staff to child ratio.
- first aid cover
- the nature of the activity, what this involves and what tasks there will be for children
- There should be a minimum of two adults present at any activity (it is recommended that there be at least one male and one female) in line with the ratios below. Staff ratios should also be based on a risk assessment e.g. increased ratios for outdoor or activities.

Required Adult to Child Ratios (as recommended by the NSPCC)		
0 – 2 years	1 adult to 3 children	1:3
2 – 3 years	1 adult to 4 children	1:4
4 – 8 years	1 adult to 6 children	1:6
9 – 12 years	1 adult to 8 children	1:8
13 – 18 years	1 adult to 10 children	1:10

2. Unaccompanied Children

The Methodist Church welcomes those of all ages and is keen to appeal to children and young people.

It is advisable that children under the age of 11 years should be taken to and collected from church or a church activity. If a child is over 11 years of age, it remains the responsibility of their parent/carer to ensure they are cared for, arrive and leave church safely.

2.1 Action on arrival of an unaccompanied child

On occasion, a child may be sent to church on their own without prior arrangement or decide to attend an activity themselves. Where possible, the following step should be taken by a party who has been cleared to work with children in regulated activity.

The following actions should be taken if an unaccompanied child arrives on church premises:

1. Make them welcome and reassure them that they are not at fault.
2. Confirm their name(s) and try to find out who the parent/carer is and their contact details.
3. If the child says anything that suggests there may be a safeguarding issue, the district safeguarding officer should be contacted for guidance.
4. If there are no safeguarding concerns that involve the parent/carer, contact them and discuss the following topics:
 - Confirm the child's location and that they are safe.
 - Provide details of the party who is looking after them and the activity the child has come to attend.
 - Get permission for the child to remain.
 - Provide a consent form and request that they complete it as soon as possible.
 - Obtain contact information for the child's next of kin and details of allergies or other health conditions.
 - Ensure that the parent/carer is made aware of the time the activity finishes and encourage them to collect their child at this time. Highlight the normal dropping off and pick up points for the activity.

2.1.1 Children not collected from an activity

Church leaders should not be expected to be responsible for, or transport, children unless this has been arranged and agreed beforehand. The required provisions around the transportation of children must be followed if this becomes necessary (see 6.10.7).

Where a child is not collected from an activity without prior agreement, the following steps should be taken:

- The parent or carer should be contacted to confirm whether it is safe for them to go home unescorted.
- If both the parent/carer and activity leader deem it is safe for them to go alone, the child should be given details of the activity. The parents/carers should be invited to discuss future arrangements.
- In the event the parent/carer cannot be contacted, follow the above steps 1-3. The police should be called and the child reported as missing from home. If there are safeguarding concerns explain these to the police. Keep trying to contact the parent/carer unless the police advise you otherwise.
- Two church leaders should always remain with a child in these circumstances if it is not possible to contact parent/carer.

Please note: If there is a risk that the child may run away before a parent/carer or social care staff arrive then do not share with child that parent/carer has been called. Make a note of their physical appearance including what they are wearing in case they run away and the police have to search for them. Also, consider

moving to a place in the building that is less open so they cannot easily abscond, and try to think of something to occupy them in the meantime. If the child leaves the building or premises, it is not advisable to follow the child as this can make their behaviour more unpredictable and therefore dangerous e.g. with traffic etc. in their attempt to get away. Church staff should not leave until all children have departed.

2.1.2 Involving other agencies

In certain situations, there may be a need to involve other agencies. If a child were very young, it would not be appropriate for them to attend church or any activities on their own. This would be regarded as neglect on the part of their parent or carer. If a child is already at church or the activity and the parent/carer is insistent that their child can attend and return home on their own and you do not feel that this is appropriate you should contact your DSO. They will give you advice on what to do next. If you are unable to get in touch with your DSO, and the situation cannot wait, children's social care should be contacted for advice. Firstly, however you should let the parent/carer know of your intention to get in touch with children's social care. This will help to maintain a positive working relationship with the family and may encourage the parent/carer to collect their child.

There may be occasions when a child tells you something that means they may be at risk of harm/further harm and you need to respond immediately. For example, if a child has a visible bruise or injury and tells you a parent/carer caused this, or if they disclose another form of abuse. In these circumstances, you should contact your DSO immediately for advice and support. Should you be unable to contact your DSO, or if the situation requires urgent action, contact children's social care. They operate an out of hours' service. If you are unable to get in touch with them, phone the police who will be able to give you guidance. Always make sure you inform your DSO.

2.1.3 Children under 11 who regularly attend on their own without prior arrangement

If there do not appear to be any safeguarding issues and the child is routinely attending church on their own, parents/carers should be contacted so a discussion can take place. The reasons for their lone attendance should be discussed and any safety implications. Other options for escorting them should be explored.

If it is not possible to avoid lone attendance, a risk assessment should be undertaken in conjunction with parents/carers and the DSO to consider whether this can be supported in the local church. The following areas should be considered:

- how the child would get to and from church
- their level of maturity
- the child's wishes and feelings
- the views of parents/carers
- the availability of staff or volunteers who are cleared to undertake regulated activity to escort the child
- any risks that may arise from lone attendance and how they might be minimised
- consideration of any persons who might present a risk on site e.g. those with relevant safeguarding contracts.

Where the outcome of the assessment suggests that the organisers of the activity can support lone attendance, arrangements should be agreed and recorded. Parents/carers should provide written consent for these arrangements. If the outcome suggests that lone attendance cannot be supported, other alternatives in the locality should be considered.

2.2 Mixed-age activities

Care should be taken to ensure that children in mixed-age activities such as choirs, music and drama groups are supervised. DBS/PVG checks are not required for adults in those groups who do not have specific responsibility for children.

Separate changing facilities should be provided when needed for adults and children and different genders. Children should be supervised only by those authorised to do so.

2.3 Safe environment

In a prominent place where children and young people can see it, the ChildLine telephone number (0800 1111) and, for parents, the Family Lives number (0808 800 2222) should be on display. Undertake a risk assessment for each activity and in greater detail for an unusual activity or when away from the usual location.

Insurance, first aid kits and fire precautions should be checked and a health and safety check should be completed regularly with reference to the following minimum standards.

When evaluating a venue, the following should be considered:

- The meeting place should be warm, well lit and well ventilated. It should be kept clean and free of clutter.
- Fire exits should be checked regularly and clearly marked. The fire exits should not be blocked or obstructed.
- Electric socket covers must never be used as they present a safety hazard. UK sockets are supplied to the rigorous safety standards of BS 1363 but safety covers are unregulated and can cause permanent socket damage including:
 - socket contact damage - results in overheating and possible fire
 - socket shutter damage - the shutters will not be able to protect children
 - some socket covers make it possible to poke pins and paper clips into the live parts
 - broken plastic pins stuck in the earth hole - prevents shutters from closing
 - wrong size pins can make covers easy to remove, some even pop out by themselves
 - children like to play with socket covers - plugging in upside down opens the shutter and exposes live contacts.
- Toilets and hand basins with hygienic drying facilities should be easily available.
- Appropriate space and equipment should be available for any intended activity.
- If food is regularly prepared on the premises, the facilities will need to be checked by the Environmental Health Office and a Food Handling and Hygiene Certificate acquired.
- Children's packed lunches should be kept refrigerated.
- Drinks should be available.
- Groups must have access to a phone in order to call for help if necessary.
- Adults must be aware of the fire procedures.
- Unaccompanied children or adults deemed vulnerable should be discouraged from walking along dark and badly lit paths in or outside of the premises.
- Suitable provision for first aid must be available.

2.4 Special needs

If a child or adult has special needs, welcome them to the group. Try to make the premises, toilets and access suitable for their needs. Ask the parents/carers how best to meet the person's needs. If premises are being redesigned or refurbished, take the opportunity to anticipate the possible special needs of future children and adults.

Disability legislation requires organisations to take reasonable steps to meet the needs of disabled people, and this includes children.

2.4.1 Children and young people who self-harm or who have mental health needs

Some children and young people self-harm to help them express their emotions. Others may express thoughts of self-harm or suicidal intent. If any child or young person expresses thoughts of suicide, advice should be sought immediately. The group leader should be informed and discussions should take place about the need to inform parents/carers and involve other services. If the situation is not urgent, consideration should still be given to contacting parents/carers and referring to appropriate agencies who can offer support.

2.4.2 Vulnerable Children and Young People

Some children and young people are more vulnerable than others to being victims of child sexual exploitation, human trafficking and modern day slavery. If it is suspected that a child or young person is affected by any of these issues, the group leader should be informed and further advice sought from the DSO and statutory authorities.

2.5 Whistleblowing

Concerns about safer practice and behaviour should always be raised as soon as possible. If any member, volunteer or employee feels that any adult is or has behaved inappropriately towards a child, they should speak to a group leader of an activity in the first instance or a church, circuit or district safeguarding officer or statutory services.

See link to the Methodist Whistleblowing Policy: bit.ly/whistleblowingpolicy

2.6 Drug and Alcohol Use

Drugs and alcohol are strictly forbidden while participating in Methodist activities for young people. This applies to staff, volunteers, visitors, children and young people. If drug or alcohol use is suspected, the group leader must be informed and a discussion should take place about informing parents/carers. Consideration should be given to the need to inform the police and for a referral to appropriate support services.

APPENDIX 3 – NOTIFYING EXTERNAL ORGANISATIONS

1. Notification to Insurance Companies

If there is a likelihood of a claim against a church insurance policy for compensation regarding a safeguarding issue, relevant insurers should be notified. While many parts of the Church have policies with Methodist Insurance, this is not always the case so confirmation should be sought to confirm the relevant insurer. A claim may overlap various insurance policies, dependent on the allegations being made and so may affect both a local insurance policy and that of the Connexional Team, district or other parts of relevant organisations. For this reason, all safeguarding cases where there is likely to be a compensation claim must be notified to the Conference Office and the Connexional Safeguarding Team who will provide support.

Referrals to the Church's counselling service or offers of pastoral support should go ahead without delay and are not affected by the existence or likelihood of a related compensation claim. This is in line with the 2015 Rehabilitation Code and is supported by insurers.

2. Reporting to Charity Regulatory Bodies

Trustees have a duty to report serious incident to the Charity Commission in England and Wales. District safeguarding officers and others providing specialist support and advice may assist in drawing up reports and updates to the regulatory body. These are referred to as notifiable events in Scotland and are reported to the OSCR. Both bodies provide extensive guidance via their website, in addition to online reporting for initial notification of all relevant incidents. All reporting is done on a case by case basis.

The DSO should be made aware of any serious safeguarding incident that is known to trustees so that support can be offered to manage the issue in line with safeguarding policy and procedure. They may also be called on to assist in preparing a referral to the relevant regulatory body or an update. The DSO will notify the Connexional Safeguarding Team of any safeguarding case that is likely to result in a referral to a charity regulator as part of casework supervision.

In most cases, submissions to the charity regulator do not include personal data, other than that of the reporting person, in the first instance, to protect confidentiality. However, details of the charity, the circumstances, their impact on the charity, the connection to the charity of those involved and action taken will need to be reported. Further guidance on reporting serious incidents to the Charity Commission: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

Further guidance is available from OSCR:

www.oscr.org.uk/media/2155/2016-03-15_guidance-for-notifiable-events_web-version.pdf

The Commission or OSCR will assess the nature and level of any risks and look at how the matter has been dealt with. They may contact the person who submitted the report if they need more information or feel the following may apply:

- The Local Church needs regulatory advice and guidance
- The Commission needs to use its legal powers to protect your Local Church and/or the people who come into contact with your Local Church through its work
- Further updates are required for example on the outcome of an investigation
- Monitoring by the Commission is necessary to support progress in dealing with the incident.

3. Notifying other Churches and Community Organisations

Where the subject has involvement with another organisation, those from that organisation may need to be informed of the concerns. The nature of the person's involvement at the current time should be established before disclosing information.

See Section 5 *Procedures for information sharing and confidentiality*. Further advice can be obtained from the DSO or via the local authority designated officer/Children's Services/Adult Social Care.

APPENDIX 4 – PROCEDURES FOR THE MANAGEMENT OF SAFEGUARDING INFORMATION

Careful attention should be paid to the storage, use and sharing of data held by the church relating to other people. This is critical to ensure that those who engage with safeguarding processes have confidence in the legitimacy and appropriateness of actions taken. The management of information is governed by law, statutory and government guidance including:

General Data Protection Regulation (2018)

ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr

Working Together to Safeguard Children (2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

Information Sharing for Practitioners (2018)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

Care and Support guidance issued under the Care Act 2014 bit.ly/2bOUaho

Adult Safeguarding: Sharing information – SCIE Jan 2015 bit.ly/1cIHFBB

Data Protection Act (2018)

Further guidance in relation to information sharing can be found in Section 7.3.2 Information Sharing Guidance.

1. The General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) and Data Protection Act (2018) outline the rights of individuals regarding information that is held and used by organisations. Many of the provisions which were previously within the Data Protection Act 1998 are also present within GDPR and new Data Protection Act but the requirements for transparency have been increased, along with the sanctions for failing to comply. Everyone within the church should understand their responsibilities under GDPR and comply with its requirements.

The introduction of GDPR and the Data Protection Act (2018) provide an opportunity for all those engaging in activities, which relate to safeguarding to review how they use information about others and commit to the highest standards of data protection practice. This is in line with the Safeguarding Policy commitments contained in Section 2 and should form a part of all safeguarding activity.

Further information is available from the following sources: <https://www.tmcpc.org.uk/> <https://ico.org.uk/>

2. Key terms relating to data protection

There are several key terms relating to data protection and the GDPR, which need to be understood in order for those supporting safeguarding within the Methodist Church so that they comply with their legal responsibilities.

Personal Data is any information relating to an identified or identifiable natural person, the 'Data Subject'. This could include details such as names, dates of birth and addresses relating to safeguarding. If the information is anonymous, it will still be personal data if it is possible to identify the individual through the circumstances.

Special Categories of Personal Data

- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric identity data
- health information
- sex life
- sexual orientation

In most cases, safeguarding concerns will include special category personal data.

Criminal Offence Data is designated under a separate category with additional requirements relating to its processing. This is information relating to criminal allegations, proceedings or convictions.

The Controller is the legal entity that is responsible for ensuring compliance with data protection requirements:

- for churches, circuits and districts, this is the Trustees for Methodist Church Purposes
- for the Connexional Team, this is Methodist Council. They will also be the relevant Controller for safeguarding and complaints and discipline matters.

The Processor is any person who processes data on behalf of the Controller. This will include those who record and share personal and special category data within safeguarding contexts. GDPR confirms the responsibility of processors to comply with the provisions of GDPR. For this reason, all parties who are likely to process data within a safeguarding context are advised to gain familiarity with key concepts and definitions and raise any queries or requests for clarification with safeguarding officers.

A Data Subject is an individual about whom personal data is held by an organisation.

A Privacy Notice is a notice informing individuals about why their personal data is being collected, how it will be used, their right of complaint and access to that information.

Data Mapping is the process by which organisations assess the categories of information they process and record, how this information is used and for how long it needs to be retained. Retention schedules are available on the TMCP and Methodist Church websites confirming the length of time data should be held.

2.1 How must data be processed?

- fairly
- transparently
- for a specified, explicit and legitimate purpose
- adequate and limited to what is necessary
- accurately and kept up to date
- for no longer than necessary for the specific purpose
- securely

Undertaking the following activities will help to ensure compliance with the principles of data processing under the GDPR:

- take time to understand policies and procedures provided by the Methodist Church which address data protection

- be prepared to explain an individual's rights under GDPR if they raise questions during safeguarding processes
- provide privacy notices that clearly explain the lawful basis for processing and provide details of the data subject's rights
- ensure that data subjects have an opportunity to advise data processors of any inaccuracies and be proactive in making corrections within required timescales
- follow information provided in this Safeguarding Policy, Procedures and Guidance document about storage, retention and sharing of data, particularly with reference to security
- review practice to ensure that the retention of information is actively managed and time frames for retaining material are followed.

2.2 What are the rights of a data subject?

1. Right to be Informed

This is addressed by the provision of privacy notices (see 5.1.4) and information supplied by the Methodist Church from various sources.

2. Consent

Any consent must be true consent with a right to withdraw that consent. Consent must be explicitly provided and not assumed. Many safeguarding data processing actions are required by legislation, statutory or government guidance, in which case consent is not needed.

3. Right of Access

This is addressed by the Subject Access Request process through which information held about an individual may be obtained (see 5.1.5).

4. Right of Redaction

Inaccurate or incomplete data should be corrected within one month. This period can be extended to two months if the material is complicated. Third parties with which the information has been shared must be advised of the corrections.

This is done routinely within risk assessment processes where a draft copy of the assessment is supplied to the subject to allow them to identify inaccuracies and provide feedback before it is submitted to the Safeguarding Panel. Where inaccurate information has been corrected, a note should be retained to confirm that action has been taken, who made the amendment to the record and the date on which this was done.

If a factual inaccuracy is notified, then it is important to clarify whether it is erroneous information or an evidenced judgement from a risk assessor or other party with which that person is in disagreement. It may be helpful to discuss this in more detail with the individual reporting the error.

5. Right to Erasure or Right to be Forgotten

This is **not** an absolute right and may be requested in the following circumstances:

- the data is no longer necessary for the purpose for which it was collected
- consent is withdrawn
- there is no legitimate interest for the continued processing
- the data was unlawfully processed
- the data related to online services aimed at children
- if it causes unwarranted damage or distress.

A few exceptions exist to this right, such processing is in order to comply with statutory requirements or to defend a legal claim. Bearing in mind current requirements to retain information, advice should be taken from Conference Office and/or the data controller before deleting a record.

6. Right to Restrict Processing

Individuals can restrict processing activities where:

- the accuracy of the data is questioned
- there has been an objection to the processing and it is being considered whether there are legitimate grounds to override the objection
- processing is unlawful and the individual has requested restriction as opposed to erasure
- the data is no longer required but the individual requires it for legal purposes

Where it is believed that this right may be applicable relating to safeguarding information, guidance should be obtained from the relevant data controller and Conference Office, before any restrictions are put in place.

7. Right to Data Portability

This allows individuals to transfer their data from one organisation to another. Further advice should be taken from the data controller in relation to this right.

8. Right to Object

If an objection is raised by an individual to the data processing, it must be stopped immediately unless:

- it can be demonstrated that there are legitimate grounds for processing which override the rights and freedoms of the individual; or
- is required to establish, exercise or defend a legal claim; or
- conducting research for the performance of a public interest task.

Further advice should be taken from the data controller where the right to object is raised as a matter of urgency.

9. Automated Decision Making or Profiling

This gives individuals the right to have a decision undertaken by a human, rather than an automated system. It is unlikely to relate to safeguarding within the Methodist Church.

3. Privacy Notices

Privacy notices are central to effective data protection practice within safeguarding and they should be supplied using standard documents for specific activities such as reporting a safeguarding concern, ongoing safeguarding case management and before undertaking a risk assessment. Standard documents are available via the Methodist Church website and should be used on all occasions as the basis for information provided to individuals. This is to ensure that all information required by GDPR is supplied. Sample privacy notices may be found on the Methodist Church website.

Children must also be provided with information about how their data is used in the same way as adults but it should be appropriate to the child's age and capacity to understand.

For further details of specific information that must be included in a privacy notice see Appendix 4.

3.1 When should information be supplied?

- a) If information has been provided by a person to whom it relates, a privacy notice should be supplied at the time.

However, safeguarding concerns may be raised at times and in situations where to provide an immediate notice is impossible. Disclosures are often made on the basis of perceived trust in an individual and do not relate to their role or familiarity with data protection. The person may be too distressed to receive this information and discuss the contents at the point of initial disclosure. In such circumstances, a church, circuit or DSO should be contacted at the earliest opportunity (within 24 hours) to provide support and assist with the provision of the required information. It will be helpful for anyone in this position to tell the person who is providing information and confirm when a privacy notice will be supplied.

- b) If information has been supplied to the church by a third party which relates to another individual, the person to whom the information relates should receive a privacy notice within a reasonable period of the data being received within one month.

The privacy notice should have been supplied at the first point at which contact was made or before the data is disclosed to another party. Where police, children or adult services are involved or likely to become involved, advice from the relevant statutory agency should be taken before disclosing any information to a party who is not already aware that the information has been passed to the church.

Where a privacy notice is supplied to a survivor of abuse or someone who is experiencing anxiety as a result of safeguarding processes, it may be appropriate to provide an explanation in person or via telephone to provide reassurance. This should be approached sensitively and explained with care. It will be helpful to make the point that the Methodist Church places great emphasis on ensuring that all parties are made aware of their rights and that details are provided as required by GDPR. The use of privacy notices will become familiar practice but may initially be unfamiliar and *cause* concern. Many people will be glad of this transparency, though some may feel concerned that clarifying circumstances, or making others aware of information they may not have been aware of previously, may cause unnecessary anxiety. Under GDPR, the provision of a privacy notice is now mandatory.

Even where processing is being undertaken without consent for safeguarding purposes, the Data Protection Act 2018, Schedule 1, Part 2 (see 5.1.5), still requires a privacy notice to be supplied at an appropriate time.

4. The Lawful Bases for Processing Personal Data

The basis for processing personal and special category data must be included in a privacy notice. Processing on the basis of consent or legal obligation may be the most relevant to safeguarding activities.

Where processing only relates to personal data, one of the following bases must be included in the privacy notice:

- a) Consent: the individual has given clear consent for the church to process their personal data for a specific purpose. This may apply where an application is being made for enhanced DBS clearance in relation to regulated activity.
- b) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations). This is likely to apply where a safeguarding concern is reported and parties within the church are required to interact with statutory authorities or take action to address safeguarding risks.
- c) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- d) Vital interests: the processing is necessary to protect someone's life (generally life or death situations only).
- e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

- f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data, which overrides those interests.

Where processing relates to special categories of personal data (see 5.1.1), the privacy notice must include the following:

- one of the six legal bases for processing personal data (above)
- AND one of the conditions below:
 - a) Consent for one or more of the specified processes
 - b) Processing is required under obligations relating to employment, social security and social protection law.
 - c) It is necessary to protect the vital interests of the subject or another person where they are incapable of giving consent.
 - d) It is carried out in the course of legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that processing relates solely to the members or to people who have regular contact with it in connection with its aims. Personal data is not disclosed outside that body without consent.
 - e) Processing related to data which is made public by the subject.
 - f) It is necessary in relation to legal claims or court requirements.
 - g) It is necessary in the public interest on the basis of a law which is proportionate to the aim pursued.
 - h) It is necessary in relation to preventive or occupational health or the provision of health and social care.
 - i) It is necessary for public health, cross-border threats to health etc.
 - j) It is necessary for archiving in the public interest (scientific or historic).

5. Specific Provisions in the Data Protection Act 2018 relating to Safeguarding

While the General Data Protection Regulation provides for routine processing of data for church activities, the Data Protection Act 2018 makes specific provision for the release of information relevant to safeguarding situations.

1. The supply of information to investigations or inquiries conducted by statutory agencies such as police, adult or children's services.

In this case, the legitimate basis for processing is that it is in the substantive public interest for the prevention or detection of an unlawful act under the GDPR and Data Protection Act 2018,

Schedule 1, Part 2 (10). In all cases, a data protection form should be requested from the agency requesting the information which should be added to the safeguarding record. Concerns **about** the vulnerability of any party must be passed to the officer receiving information in writing.

2. Other safeguarding activities including recording information, making inquiries, risk assessment and the application of safeguarding measures.

The legitimate basis for these activities is that it is in the substantive public interest and necessary for the protection of someone of any age at risk from neglect, **or** physical or emotional harm, in accordance with the Data Protection Act 2018, Schedule 1, Part 2 (18). This includes specific individuals and groups [...] (e.g. children or adults at risk). If there is reasonable suspicion that the individuals need care and support,

are at risk from neglect, physical or emotional harm and unable to protect themselves, they are considered at risk for this legislation. Information can be shared without consent.

On occasion, concerns are raised that information sharing about safeguarding issues is a breach of the subject's human rights. Information Sharing for Practitioners (2018) provides the following guidance:

The provisions of the Human Rights Act and the common law duty of confidence must be balanced against the effect on children or individuals at risk, if information is not shared. Welfare of a vulnerable party is the most important thing and the need for disclosure should be assessed in every case on an ongoing basis.

It is possible that it is in the subject's overall interests, the public interest, or a legal obligation such as a court order may require disclosure. In the context of safeguarding a child or young person, where the child's welfare is paramount, it is possible that the common law duty of confidence can be overcome.

It can sometimes be helpful to share a copy of the government guidance to reassure those who may have concerns about the basis and legitimacy **of** information sharing.

6. Subject Access Requests

Where an organisation holds data about an individual, under the GDPR, they have a right of access to that information. This can be obtained via a Subject Access Request, which **is** free of charge. The person may apply to the data controller for a copy of the information held about them.

For routine data processing for all churches, circuits and districts, the Trustees for Methodist Church Purposes act as the Data Controller.

For data processing relating to safeguarding, complaints and discipline the Data Controller is the Methodist Church in Britain. Subject Access Requests relating to safeguarding, complaints and discipline should be sent to the Data Protection Officer at dataprotection@methodistchurch.org.uk or

Data Protection
Methodist Church House
25 Marylebone Road
London
NW1 5JR

All other subject access requests should be sent to:

Trustees for Methodist Church Purposes
Central Buildings
Oldham Street
Manchester
M1 MJQ

Further information is available from the TMCP website: <https://www.tmcp.org.uk>

7. Retention of Safeguarding Information

The Independent Inquiry into Child Sexual Abuse (IICSA)

In March 2015, a government inquiry into child sexual abuse **in** statutory and non-statutory organisations was set up. The Chair of the inquiry wrote to church leaders outlining its authority to request information under Section 21 of the Inquiries Act 2005. The Chair confirmed that it was an offence to destroy, alter or tamper with evidence with the intention of suppressing **it** or preventing its disclosure to the inquiry.

Consequently, the Chair directed that that information relevant to child sexual abuse in organisations should not be destroyed during the course of the inquiry. Prolonged retention of records for this purpose will not be considered a breach of the current Data Protection Act. This will also apply to GDPR.

Relevant safeguarding material includes the following documents:

- safeguarding casework files and records
- safeguarding referrals for advice, inquiries and support to other organisations and internally
- risk assessments
- documents relating to Safeguarding Panels
- safeguarding contracts
- quality assurance information e.g. safeguarding audits, data returns etc.
- files relating to education establishments, recruitment and safeguarding
- HR Staff files
- complaints and discipline material
- files on appointments to councils, committees and other bodies
- files and papers relating to Subject Access Requests
- safeguarding leadership and governance at a church, circuit, district and Connexional level
- DBS checks
- records of safeguarding concerns about children and young people or about behaviour towards them
- policies and procedures relating to safeguarding children and young people

The following links contain documents that confirm this position: <https://www.iicsa.org.uk/key-documents/78/view/letter-to-religious-leaders.pdf> <https://www.iicsa.org.uk/key-documents/115/view/2018-07-25-guidance-note-retentioninstructions-data-protection-requirements-version-2.pdf>

Full Methodist Church retention schedules may be found [here](#) on the TMCP website.

8. Data storage

The following measures should be put in place if material containing special category or criminal data is retained:

- Access provision should be carefully planned

Only those that are required to see and use records should have access to them. A written protocol listing who has access should be drawn up with clear provision for emergency access. Data held on personally owned computers can be lost if unforeseen personal circumstances arise. This should never be the sole source of safeguarding records.

- Digital files should be subject to regular back-up.

If the data is stored on a stand-alone computer, the provisions for back-up should be away from this source to ensure that there is another copy if hardware is lost or corrupted beyond recovery. A secure server is the best option for back-up, where available but again access to safeguarding files should be limited to personnel listed in the access protocol.

- Pen drives or removable media must be encrypted if they are being used to store safeguarding records. However, the risks of loss of such items are higher than less mobile storage so great care should be taken in use.
- Software which identifies viruses, malware and phishing must be installed on systems storing safeguarding records. It must be regularly updated and the provision must include a regular scanning facility.
- Hard copy material must be stored in lockable cupboards or cabinets. Where available, these should be fire-proof.

- If material is scanned for digital retention, care should be taken to ensure that all parts of the document are contained in the scan, particularly the edges of documents. It is important to retain the integrity of the document; in case it is needed for proceedings at a later date.
- If plans are made for archiving safeguarding material with another institution, that organisation must be informed of the Methodist Church's requirements relating to retention of safeguarding records to ensure that records are not destroyed in error at a later date.
- Passwords must not include personal data which is easily identifiable e.g. a name, address, place or date of birth. Choosing three random words for a password can be easily remembered by visualisation of the items together and will create an appropriately secure password. This can be enhanced further by using a capital letter, number and symbol.

9. Data Security & Breaches

Careful consideration should be given to data security when storing, using and sharing information. Methods used to secure data should be reviewed on a regular basis. Data relating to safeguarding cases should always be handled with the utmost care. It is likely to include the most sensitive forms of data and any breach of data security is likely to have a serious impact on the parties involved. Safeguarding officers within the Church are committed to building trust with those whom they deal by ensuring that data security measures are in place to protect information. This includes following guidance about the secure transmission of information and protecting data that is retained e.g. the storage of hard copy material in locked cupboards or cabinets. All parties holding safeguarding data electronically must ensure that their computers have virus, malware and anti-phishing software, which is regularly updated.

The General Data Protection Regulation identifies a data breach **as** the unlawful or accidental

- destruction
- loss
- alteration or
- unauthorised disclosure of any personal data.

What sort of issues could cause a breach of safeguarding data?

- A password on a computer becomes compromised so a third party gets access to safeguarding records.
- An email including personal data is sent to the wrong person via the auto complete address feature in an email.
- A tablet or laptop is lost or stolen.
- A computer crashes, or a virus infects data and records are no longer accessible.

What action should be taken if a breach of data protection takes place?

- Establish the extent of the breach and the impact that is likely on others, including emotional distress and physical/material damage.
- Contact a line manager or person in oversight.
- Advise the Connexional Safeguarding Team.
- Consider what measures will be needed to contain and manage the situation e.g. taking specialist advice, reporting to Police. Action should be taken as soon as possible.
- Record details of the nature of the breach and the action taken.
- If it is likely that the breach will result in a significant impact on the data subject, data controller to report it to the Information Commissioner within 72 hours. Where full information is not available, limited details can be reported in the first instance.

- Contact the data controller and data protection officer for further details and guidance as to what is required, including whether the subject of the information should be informed.

What type of data protection breaches must be reported to the Information Commissioner? High risk situations are likely to require a report to the ICO. These are where there is the potential for people suffering significant detrimental effect such as discrimination, damage to reputation, financial loss, or any other significant economic or social disadvantage or where this has already happened.

9.1 Step-by-step guide to sharing information

Taking into consideration the above documents and the guidance provided in section 7.3 *Information sharing guidance*, the following procedure should be adopted when receiving a request for personal data or making such a request.

i) **Validate the person requesting information**

Before supplying any information to a third party, check their identity and that they are in a role or position, which is entitled to make such a request and **to** receive the information. If you have prior personal or organisational knowledge of the person concerned you will not need additional validation. However, it can be tempting to be helpful and respond directly, particularly to calls which suggest they may come from a statutory agency or another church member, or are said to need urgent action.

The following actions may be taken to validate the person requesting the information:

- requesting confirmation of the request via an organisational email
- calling the person back via a main switchboard number to ensure that the number is linked to that organisation
- speaking to a manager or other key individual who may be able to verify that person's role or involvement
- doing an internet search to identify information about an organisation or individual
- checking with someone else you know who might be able to verify the person's role and identity.

If making a request for information, offer to provide evidence of your validity to the holder of the information by any of the methods above.

ii) **Validate the nature of the request**

Think carefully about whether there is a legitimate reason to disclose the information that you are thinking of sending and only disclose what is relevant and proportionate in the circumstances, *which* could include:

- current risk to a child
- current risk to a vulnerable adult
- request to provide information in relation to a statutory investigation (Police, Children's Services or Adult Social Care etc.)
- court order
- subject access request under the General Data Protection Regulation.

If there is any doubt about whether there is a legitimate reason for providing information, ask the DSO. If you are making a request for information, say why you believe there is legitimate reason for the other party to disclose it, identify any risk posed by not doing so, and say how **it** will be used. If the third party is not aware of safeguarding processes in the Methodist Church, it is often helpful to explain the procedures.

iii) **Consider whether it is appropriate to gain consent**

People often feel concerned about asking or telling someone that information about them is going to be disclosed to another party, particularly when it may not give a positive impression. Be prepared to identify at

the outset information may be shared if there is believed to be a safeguarding risk. This often leads to greater acceptance, as the person sharing the information is perceived as acting in an open and honest way.

Explain:

- why the information is being shared
- what will be shared
- how it will be shared
- with whom it will be shared.

It may not be appropriate to gain consent or make the person aware that information is being shared if it will:

- prejudice the prevention or detection of a crime
- risk the health or safety of a vulnerable adult or child.

Where consent for information sharing has been refused by an adult believed to be at risk of harm, consider the following questions:

1. Does the person have capacity to provide the consent?
2. Could they be under duress or in fear of harm if they consent?
3. Are children at risk through the adult's refusal of consent?

If lacking capacity to provide consent, under duress or in fear or where there are children at risk, it may be necessary to share information without consent.

iv) **Consider the most secure way to provide the information**

While no method of sending personal information is completely *infallible*, due regard should be given to the security *of* personal data.

If using standard mail:

- Use recorded delivery, registered delivery or a courier.
- Do not write "Private and confidential" on the outside of the envelope, as this may draw attention to the contents.
- Avoid window envelopes that may allow the contents or name to be viewed from the outside.
- Ensure that the envelope is addressed to an individual.
- Confirm that the address is current and appropriate.
- If it is a residential address and a multi-occupancy premises, confirm that the mail is delivered to a secure place such as an individual mailbox, rather than being left in an open hallway.

If using electronic mail, the following options may be used:

- an encryption system
- a password-protected attachment with the password sent via *separate means (i.e. not by a further email to the same email address)*
- an email with anonymous content with a key sent separately
- check that you have the correct and current email address. Ask the recipient **to** confirm receipt, and follow up if this is not received

v) **Make a record**

When sharing personal information, you should make a record of the following information:

- what was shared
- with whom
- when

APPENDIX 5 - PREPARING FOR A SAFEGUARDING CONTRACT

1. Preparing for a safeguarding contract

When it becomes evident that a safeguarding contract may be necessary for any of the above reasons, the DSO must be informed, if they are not already engaged in the process. This should be the DSO of the district in which the subject intends to engage with the Methodist Church but it may also be necessary to liaise with ministers and safeguarding officers from another district if there has been previous contact there.

The implementation of a safeguarding contract should follow a 4-stage procedure with all stages undertaken consecutively, as follows:

- a) collation of information from relevant sources
- b) identification of risks relevant to that information
- c) consideration of current safeguarding practices and mitigating factors
- d) drafting a contract, which addresses risks and makes provision for positive support in developing the person's engagement with the Methodist Church.

It can be tempting to rush ahead to get arrangements in place by using standard contracts which have been developed for other parties or circumstances. This must be avoided and each person and situation should be considered in their own right. Each stage of the contract development process (a-d) should inform the next. This is to ensure that any measures that are put in place are based on information known about the person or circumstances and address the specific risks that are presented by those activities or location.

The rationale for successful contract conditions should be easily comprehensible to the subject, safeguarding officers and members of the Monitoring and Support Group.

Conditions must be defensible and proportionate to the specific risks identified in each case. This can allow the subject and group to focus on moving forward and avoid unnecessary challenges as time progresses. It may not remove all sources of dispute or disagreement but it will assist in developing a clear and accountable approach from the start. The time and care taken to implement carefully designed conditions will pay dividends in allowing trust and effective relationships to be built between the subject and group.

The DSO with the support of the minister in pastoral charge or circuit superintendent will need to oversee the following activities:

- arranging a meeting with the subject of the contract to provide relevant information
- identifying suitable people to become the chair and members of the Monitoring and Support Group and assembling them.

These activities may be undertaken by another suitably experienced and/or qualified member on behalf of the DSO and minister in pastoral charge with their agreement. However, in every case, the necessity and proportionality of disclosure of sensitive information should be considered.

The following activities will be undertaken by the DSO:

- liaising with statutory authorities and other relevant organisations
- producing (or overseeing) the relevant risk assessment activity

- initial briefing of the Monitoring and Support Group members
- training the Monitoring and Support Group members
- drafting a safeguarding contract.

2. Reflecting views of survivors when preparing for a safeguarding contract

Where a contract is being put in place following a safeguarding panel, a district or Connexional risk assessment will have been undertaken using a template report format. The template includes a section for the comment of any known survivor who wishes to contribute as part of the assessment. The DSO must be provided with a copy of the risk assessment at the conclusion of the panel process and will review its contents prior to setting up a MSG. A summary of comments by survivors linked to the case should be included in the SGC/1 so that their reflections may be addressed in the consideration of risk. If there is no information in the risk assessment identifying contact has been made with survivors or they are not known, the DSO should request confirmation of this from the Casework Supervisor who oversaw the risk assessment and panel process.

Where there has been no prior risk assessment, the DSO will confirm in each case whether survivors are known to the Church and whether they wish to make any comment. If no survivors are known, do not wish to contribute or provide reflections, this will be noted on the SGC/1.

3. Planning the meeting

When planning a meeting with those who might present a safeguarding risk, the District Safeguarding Officer should share sufficient information with ministers who will be attending, to allow an informed discussion of any concerns in advance. This should include the structure of the meeting, topics for discussion and any potential risks to health or wellbeing that may be apparent.

In every case, safeguarding staff and ministers should put in place appropriate arrangements following this discussion to minimise known risks.

These might include:

- meeting in a location and at a time where others can be called on if necessary
- ensuring that others are aware of the time and nature of any meeting if conducted in the party's home or away from church premises
- agreement about how difficult subjects or behaviours might be managed within the context of the meeting and the environment
- having sufficient people present to respond to any likely circumstances
- reflecting on the potential impact of the content of any discussion about the safeguarding concern or offending on the representatives of the Church involved
- discussing any issues affecting any party due to attend that may affect their ability to take part.

Further contact may be necessary with statutory agencies to discuss any risk to those representing the Church.

3.1 Content of the meeting

The meeting should cover the following areas:

- information about the process of putting a safeguarding contract and Monitoring and Support Group in place
- arrangements for pastoral care
- provision of a privacy notice to the potential subject of a contract and completion of the form acknowledging receipt of information and providing communication preferences.
- an opportunity for the subject to explain their personal circumstances, allegations, and convictions
- an exploration of the nature of safeguarding risk and how this is handled in the Methodist Church
- consideration of the nature of any risks to those who are already engaging in the local church
- clarification of their wishes about the activities they would like to undertake and level of involvement with the Church.
- support networks available to the subject such as family and friends
- other positive aspects such as employment, voluntary work or activities.
- an opportunity for the subject to consider what positive outcomes they would like to work towards as part of their engagement with the Church
- how the Church can assist the subject with positive objectives.

It is helpful to initiate a conversation that allows the person to reflect on how they have arrived in their current situation. This will provide a clear understanding of the person's perception of past and current events and acknowledgement of any potential risk. This should be undertaken without judgement but with respectful uncertainty, so that the person is given a realistic idea of the opportunities that may be open to them. It may become apparent that the church the subject wishes to attend cannot facilitate their engagement. This could be because of the presence of vulnerable members of the congregation or because there are insufficient members of the congregation to set up an MSG. In this case, it should be acknowledged as soon as possible and alternative options provided.

3.1.1 Identifying a Chair and Monitoring and Support Group (MSG) Members

In some circuits and churches, there is a great deal of experience of working with those subject to safeguarding contracts as part of MSGs. In other locations, this may be the first occasion on which a group is required. The DSO will work closely with the local minister in pastoral charge or circuit superintendent to identify suitable people to undertake these roles. Where a safeguarding contract is requested by a Safeguarding Panel, there may be specific recommendations about the sort of experience or people needed for the MSG.

Appropriate safer recruitment procedures should take place prior to engagement with a MSG for the first time to ensure that both chairs and members are able to undertake the required activities. The DSO or minister in pastoral charge should find time to discuss the demands of the role with all new volunteers before any commitment to join a MSG.

The DSO should not be a full member of any group, as their role is to provide ongoing support and advice from a position outside of the group. This is particularly important with regard to the

removal of a safeguarding contract where the independent opinion of the DSO, among others, is an important contribution to the decision making.

3.1.2 The Chair

The chair of the Monitoring and Support Group may be the minister in pastoral charge or circuit superintendent in many cases but the value of an independent chair should not be underestimated. The circumstances of the local church, the availability of skills and confidence in managing safeguarding contracts are also relevant. Supernumerary ministers and others of similar standing living in the locality may be invited to undertake the role of chair. They can provide a valuable source of experience and independent leadership and close partnership with the minister in pastoral charge and DSO.

The key skills for the chair of an MSG are:

- ability to encourage all parties to engage actively, even where different perspectives may be held
- commitment to leading the group and personal resilience to manage sensitive and complex situations
- problem solving skills and an ability to face challenging situations
- willingness to extend current knowledge of relevant Standing Orders, policies and procedures and develop safeguarding practice
- ability to support the development of effective relationships and communication
- confidence to raise matters of procedure, policy or practice with relevant officers on behalf of the group or subject
- ability to provide the leadership necessary for the monitoring and support functions of the group to be balanced
- a supportive and open mind-set so that members of the group feel able to raise concerns whether they relate to the running of the group or their capacity to take part
- understanding of the importance of information management and data security.

4. Members of Monitoring and Support Groups

The following principles should be considered in identifying suitable members for Monitoring and Support Groups:

- The group should comprise about five people who may include the minister in pastoral charge and any person who has agreed to offer pastoral support or accompany the subject of the contract in worship or other church activities.
- There is no expectation that everyone taking part as a member will have had professional or voluntary safeguarding experience in the past. They will be given a clear briefing by the DSO before the first full meeting and additional relevant training opportunities to support this work.
- The majority of members usually come from the local church, but at least one member of the local church must be included.

- It is helpful to include at least one person who has a safeguarding background, whether inside the Church or outside e.g. previous roles in teaching, youth work, social work, probation services, policing or health. This can bring confidence to the group as a whole.
- The group should be balanced in point of view so that considerations do not become unduly negative or unquestioningly supportive of the person subject to the safeguarding contract.
- It is always useful to include someone with an independent view from beyond a particular church or circuit. This could be in the form of a DSG member, retired supernumerary minister the relevant police or offender manager.
- Members may need a robust attitude both in terms of the nature of offending that may be discussed, and the likelihood of challenge by the subject of the conditions.
- It is not necessary that all members are in full agreement with each other at all times and a diversity of opinions is a healthy. The ability to listen to others and respond constructively to differences in opinion are key principles for successful engagement.
- Conflicts of interest should be carefully considered. The efficacy of any group may be harmed by vested interests or where independent consideration of issues is not possible.

4.1 Preparatory Meeting of the Monitoring and Support Group

The subject does not attend the preparatory meeting of the MSG. The purpose of the meeting is to prepare the members for undertaking their role. This is for the group to become familiar with each other, to be briefed about the relevant policies and procedures and to ask questions or raise concerns, before formally meeting with the subject. This is usually led by the DSO, with the minister in pastoral charge or the circuit superintendent in attendance.

Copies of key procedural documents or relevant extracts may be provided before the meeting or at the time, as well as a verbal explanation. By the end of the preparatory meeting, the members should be clear about their responsibilities and feel confident about what they are undertaking.

The following items may be considered relevant material for briefing members of a MSG:

- Standing Orders 690, 010, 232-237, Book VI Part 4
- Methodist Church Safeguarding Policy (particularly sections 4, 7 and the glossary)
- Information Sharing for Practitioners (2018) – government guidance

Particular reference should be made during the briefing to information sharing and confidentiality requirements. All members of the Monitoring and Support Group should be requested to sign a confidentiality agreement and be provided with a privacy notice. These forms should be completed before any information about the subject and their circumstances is provided to any party. It may be helpful to show these documents or provide a copy if the subject is concerned about confidentiality or information handling. A standard confidentiality agreement can be obtained via the Methodist Church website.

All members of the MSG should be asked if they have any questions and encouraged to air their concerns about taking on this role. This will build open communication and support between group members and may prevent issues developing in future.

4.2 Information Sharing with the MSG

The DSO or minister in pastoral charge will provide a briefing about the safeguarding concerns that relate to the subject of the contract. If a Connexional risk assessment has been undertaken, the summary of that risk assessment will be provided to the Monitoring and Support Group. Alternatively, if there has been no Connexional risk assessment, a summary of the information contained in forms SGC1-2 (information and summary of risk) and a draft copy of SGC/3 (safeguarding contract) will be provided. This may take place before the meeting to allow members time to consider the documents in advance, as long as confidentiality agreements and privacy notices are already in place for those receiving the information.

It is not possible to manage a risk that is not understood and therefore sharing information with the MSG is necessary to allow appropriate responses and guidance to be provided. Sufficient information should be shared to allow the MSG to make reasoned and evidenced decisions and understand the risks that may be present. However, automatic, blanket disclosure of all known information is not advised.

DSOs are able to share extracts or the whole of a Connexional risk assessment if they feel this is an appropriate, proportionate and legitimate course of action to inform risk management. If this is being considered, the DSO will record in the relevant case file the reasons why this was deemed necessary. The level of disclosure from the SGC/1 will be agreed via discussion with the chair prior to the initial briefing of the group. The DSO and the chair should keep the disclosure of information under regular review to ensure that sufficient information is available to the MSG to reflect changing circumstances.

It is important that sufficient information should be shared with the MSG to identify any known safeguarding risks, which may be relevant to the operation of the group and may affect members. The considerations in 4.7.4.1 should apply also to planning MSG meetings.

4.3 First Full Meeting of the Monitoring and Support Group

The first full meeting will include the subject and the MSG members. A note taker should be identified for this and all meetings. The DSO and circuit superintendent or minister in pastoral charge should attend where possible. They may provide an initial briefing, respond to queries and their presence will demonstrate unity of purpose and action.

The subject may have been provided with a copy of the draft safeguarding contract as agreed by the preparatory meeting of the MSG, prior to the meeting. The contents should be discussed and an opportunity provided for the subject to raise concerns or questions. Where possible, the safeguarding contract should be agreed and signed by all parties at this meeting.

Following this and all meetings, there should be a short period of time spent reviewing the outcome of the meeting after the subject has left and discussing any issues that may have arisen. This will also allow for questions that have been raised during the meeting to be discussed and arrangements made for them to be passed on to the DSO or District or Synod Safeguarding Group (as appropriate). Any disagreement between parties in relation to matters arising in meetings should be raised out of hearing of the subject of the contract. The chair will ensure that suitable time is allocated to discussing such matters and differences of opinion so that meetings with the subject of the contract are not diverted by the airing of different views within the group. Notes of the main meeting should be shared with attendees and sent via secure means.

4.4 Future Meetings

Following the first meeting, the chair of the Monitoring and Support Group will take responsibility for coordinating the group. If a District Safeguarding Group (DSG) member is allocated to the group, the chair will ensure they are invited to meetings. Arrangements should be made by the chair for feedback to the DSO after subsequent meetings. It is the group's role, with the support of the minister in pastoral charge, to provide appropriate monitoring and support of the subject in their engagement with the church.

At each meeting the following issues should be discussed:

- Provision of an opportunity for the subject to reflect on what is working well and what has not been so successful.
- Consideration of the safeguarding contract conditions including where concerns may have become apparent and where significant positive actions have been demonstrated.
- Clear challenge of any action that may be causing concern and agreement with the subject about steps to be taken to address the concern.
- Recognition of progress towards any agreed goals and objectives or next steps.
- Identification of any questions or queries about the contract or its operation that may need to be passed on to the DSO or DSG.
- Evaluation of support in place and consideration as to whether additional support is required.

It is expected that effective channels of communication between the DSO, minister in pastoral charge and MSG Chair will remain open on a continuing, informal basis. This will include additional information sharing relating to matters regarding the subject, which become known to the DSO and may affect the activities of the MSG.

5. The Safeguarding Contract

While the Summary of Risks (SGC/2) focuses on concerns, the Safeguarding Contract has a wider remit therefore; it should include appropriate restrictions, agreed behaviours or actions, as well as commitment from all parties to work towards future goals. In order to achieve the maximum engagement with the MSG and the safeguarding contract, the subject must understand why restrictions are being put in place and feel that the Church wishes to help them move towards a more positive position.

Tips for creating an effective safeguarding contract

- Consider carefully the location where the person will engage with the Church and make relevant provisions for toileting, refreshments and movement around the location.
- Do not forget to include conditions that commit the MSG to following Methodist Church safeguarding policy, procedures and Standing Orders, safe information sharing and pastoral support. This will confirm that the MSG is working for the best interests of all parties.
- The safeguarding contract needs to be signed and dated by the subject and by the members of the MSG.

- The contract should involve the subject's family where possible, if they are engaging with the Church.
- When creating conditions, you may refer to examples in the SGC/3. These should be adjusted to contain specific references to activities and engagement, relevant to the local situation. They are only appropriate where the example chosen can be directly connected to an identified risk in that specific situation. Local solutions, applicable to individual circumstances should always be considered.

Where possible, conditions and development activities should follow SMART principles:

Specific

Conditions should include details of the individual's circumstances and activities.

Measurable

Consideration needs to be made as to how the MSG can judge whether the conditions have been met. This will assist in recognising positive progress and dealing with issues fairly. It will also support review processes.

Achievable

Conditions should be proportionate and goals achievable to encourage participation.

Realistic

Safety should not be compromised or past history ignored when considering risk. False optimism may result in the subject not being provided with the boundaries they need to move them forward and may put those engaging with the Church at risk.

Time-framed

Timeframes for the achievement of specific actions are needed and must be clearly specified at the outset. This will ensure that all parties are clear when actions will be undertaken, by whom and the required dates. This will support the review process and ensure that groups and individuals do not drift off course.

Additional Issues that may need to be considered in the contract:

- residential events
- events in another church or church organisation, circuit or national events (a joint agreement is often desirable in these circumstances)
- finding another church, circuit or district when there are victims/survivors in the preferred area
- specific arrangements required in Local Ecumenical Partnerships.

The draft safeguarding contract should also be shared with the supervising police officer and/or offender manager who has had previous contact with the DSO. That officer should be requested to review the contract for suitability to address risks of which they are aware. This is an important step to developing partnership working. It will also make sure that someone who may have more information than it is possible to release to the Church, has oversight of the proposed arrangements.

Over time, the regularity of the meetings may be reduced if all parts of the contract are being fulfilled. The minimum provision would be an annual, recorded discussion between the minister, local safeguarding officer and DSO or the appointed DSG member and the subject.

6. Recording Requirements

Where a requirement for a safeguarding contract arises from a conviction or caution for an offence specified by Standing Order 010, the following forms should be completed:

SGC/1 Safeguarding Contract Information Summary

SGC/2 Safeguarding Contract Summary of Risks

SGC/3 Safeguarding Contract Template

These forms are available [here](#) on the Methodist Church website.

Where the requirement for a safeguarding contract arises from the decision of a Safeguarding Panel under Standing Order 010 2(ii), a Connexional or district risk assessment will have been completed.

This may provide sufficient information for the completion of the SGC/3 Safeguarding Contract Template, without the use of SGC/1 & 2. However, SGC/1 & 2 may still be used to summarise information and risks, if this is felt to be helpful.

7. Non-Compliance

The most appropriate way to deal with issues arising around compliance is to tackle the situation with transparency at the earliest possible opportunity. This can often prevent an escalation or continuance of the situation and bring the subject back on track and in line with their contract. It can also prevent ill feeling, if further action is required at a later stage. While it can be difficult and challenging to raise concerns about non-compliance, the subject of the safeguarding contract should be advised by the chair of the MSG or other nominated member of the group of the behaviour which is causing concern and any breach of the conditions. Information about any concern or breach must be clear and factual, with details about when and where the concern arose or the breach took place. This may be confirmed in writing or recorded *in* the notes of the next MSG, where appropriate. The subject should be encouraged to discuss the concern so they have an opportunity to clarify the circumstances and work with the MSG to resolve the issues, where possible.

The DSO must be advised of any concern around compliance at the earliest opportunity so that support may be offered to the MSG in dealing with the situation.

Where the subject is being actively managed by police or probation services, the relevant officer should be informed of any significant or continuing concern around compliance and must be informed of any breach of civil order, registration, probation requirement or criminal activity relevant to safeguarding in the Church or outside. The chair of the group should take advice from the DSO as soon as possible, if this occurs.

In the event that a subject of a contract or interim contract is also the subject of a statutory investigation, agencies will expect that the contract considers if it is possible for the alleged abuser to continue to attend church.

7.1 Changing Circumstances

It is important to maintain continuity of arrangements for pastoral support and monitoring by planning what to do if officers and ministers changes in the church, or a member of the group is unable to continue. Where any change to the membership of the group is necessary, the minister in pastoral charge must be informed and appropriate information passed to any new member to allow them to undertake their role fully. When the minister in pastoral charge moves on, they are required to pass over details of the existence and terms of any safeguarding contract to the new minister (Standing Order 692). Where possible, a verbal briefing should take place between the two ministers to allow questions to be asked and clarification to be sought about current arrangements. If there are no safeguarding contracts, this should be confirmed.

If, due to exceptional circumstances, the new minister in pastoral charge does not receive information about safeguarding contracts in the Local Church from their predecessor, they must contact the District Safeguarding Officer and Circuit Superintendent to make them aware that this has not taken place and to seek confirmation of contracts in that location.

The new minister in pastoral charge should ensure that they are sufficiently aware of arrangements that are in place and any risks presented by the subject of a contract by liaising with the Chairs of Monitoring and Support Groups in the Local Church and if necessary, the DSO at an early stage.

If the subject is moving to worship in another circuit or at another local church, there is a duty upon the minister from the original church or circuit to inform the minister in the new location. It is for the minister in the new location to ensure that arrangements continue if the subject wishes to continue their involvement with the Church. (See Standing Orders 691-2)

7.1.1 Review

At the end of each 12-month period, a review should be undertaken by the group and an annual review form completed (SGC/4) and forwarded by the chair to the Connexional Safeguarding Team via the DSO. This should be written with reference to the original risk assessment that was prepared at the start of the contract or any subsequent one undertaken. It should state whether the risks identified initially are still relevant, have become more or less likely to occur or there is an increase or reduction in the severity of the likely outcome. If there are differing opinions within the group about issues, these may be recorded in the annual review.

At least every 3 years, the group should consider whether there have been significant changes by the subject, which warrant a change or variation **of** the contract conditions. In these circumstances, the chair of the MSG will write to the Safeguarding Director requesting a new risk assessment to consider strengthening or relaxing the conditions (including possible removal of the contract).

7.1.2 Removing or Changing a Safeguarding Contract

The Church recognizes that many people with support and guidance can change their lives to follow a positive path away from negative attitudes and behaviour. Therefore, following approval from the Methodist Conference (2017), there is now a process by which the conditions of a safeguarding contract may be changed or removed (Standing Order 690A, Constitutional Practice & Discipline of the Methodist Church).

It is important that all aspects of the process are followed so that the situation is evaluated properly, and all those who may be affected have an opportunity to contribute their thoughts and perspectives, if they wish to do so.

7.1.3 Time frames for changes/removal

At least every 3 years, the Monitoring and Support Group can consider whether circumstances have materially changed. The group should meet (or arrange a teleconference) without the subject present to reflect and carefully consider the situation.

At the conclusion of this meeting, they can make one of the following decisions:

No change is required

The Monitoring and Support Group may come to the decision that no change to the safeguarding contract is appropriate at this time. The chair will then advise the subject and record the next date at which a removal/significant change of the contract will be considered. The DSO must be notified of this decision by the chair of the Monitoring and Support Group, so that an accurate record can be maintained.

7.1.4 Significant changes or removal of the safeguarding contract requested

If a significant change or removal of the safeguarding contract is deemed appropriate, the chair of the MSG will contact the DSO. The DSO will make a request to the Director of Safeguarding (via their Casework Supervisor) for a new risk assessment to review the changed circumstances. The Director of Safeguarding will then confirm *whether* the DSO is in support of this action.

Where the party subject to a safeguarding contract is currently under any form of statutory supervision, management or legal restriction in relation to safeguarding matters, consultation with the relevant supervising officer, statutory agency or oversight body must have been undertaken by the DSO, prior to a recommendation for change being forwarded to the Safeguarding Director. The Safeguarding Director must be advised of the opinion of the party or body consulted.

The Safeguarding Director will review the request for a new District Risk Assessment to be undertaken and authorise the assessment, where deemed appropriate.

7.1.5 District Risk Assessment

In most cases, a request to materially change conditions or remove a safeguarding contract will require a district risk assessment, carried out by the DSO. The Safeguarding Director may decide that it is more appropriate for a Connexional Risk Assessment to be undertaken, using an assessor from outside the district. In either case, the standard template (SGC/5), which is available via the Methodist Church website, should be used for the amend/change process.

The SGC/5 risk assessment form template includes an opportunity for key parties to express their views. The risk assessor will seek to include the opinions of relevant parties, in addition to their own assessment of the situation. The assessment will be considered by a Safeguarding Panel who will provide direction as to whether change or removal is appropriate. There is no right of appeal following a risk assessment under the amend/change process and the subject must wait until the next opportunity for a review within 3 years and with the support of the Monitoring and Support Group.

7.1.7 Dormant Contracts

Where a safeguarding contract is considered to be dormant because the subject is no longer engaging with the Church for a period of 12 months, then the arrangements may be brought to a close.

The chair of the Monitoring and Support Group should inform the subject that the group will no longer be meeting and the reason for this. They should also confirm that the group may be re-

started and arrangements renewed if they wish to return or circumstances change. It is preferable that written notification is provided by the chair but if this information is shared verbally, a note of the decision must be added to the file, prior to closure.

District safeguarding officers should be notified as soon as possible when a party subject to contract indicates they may wish to cease contact with the Church or this is likely to be the case. DSOs will notify the Connexional Safeguarding Team of any contract that is dormant so that records may be updated in line with GDPR requirements.

Figure 1. Flow Chart - Setting up a Safeguarding Contract for a Person with a Relevant Conviction or Caution

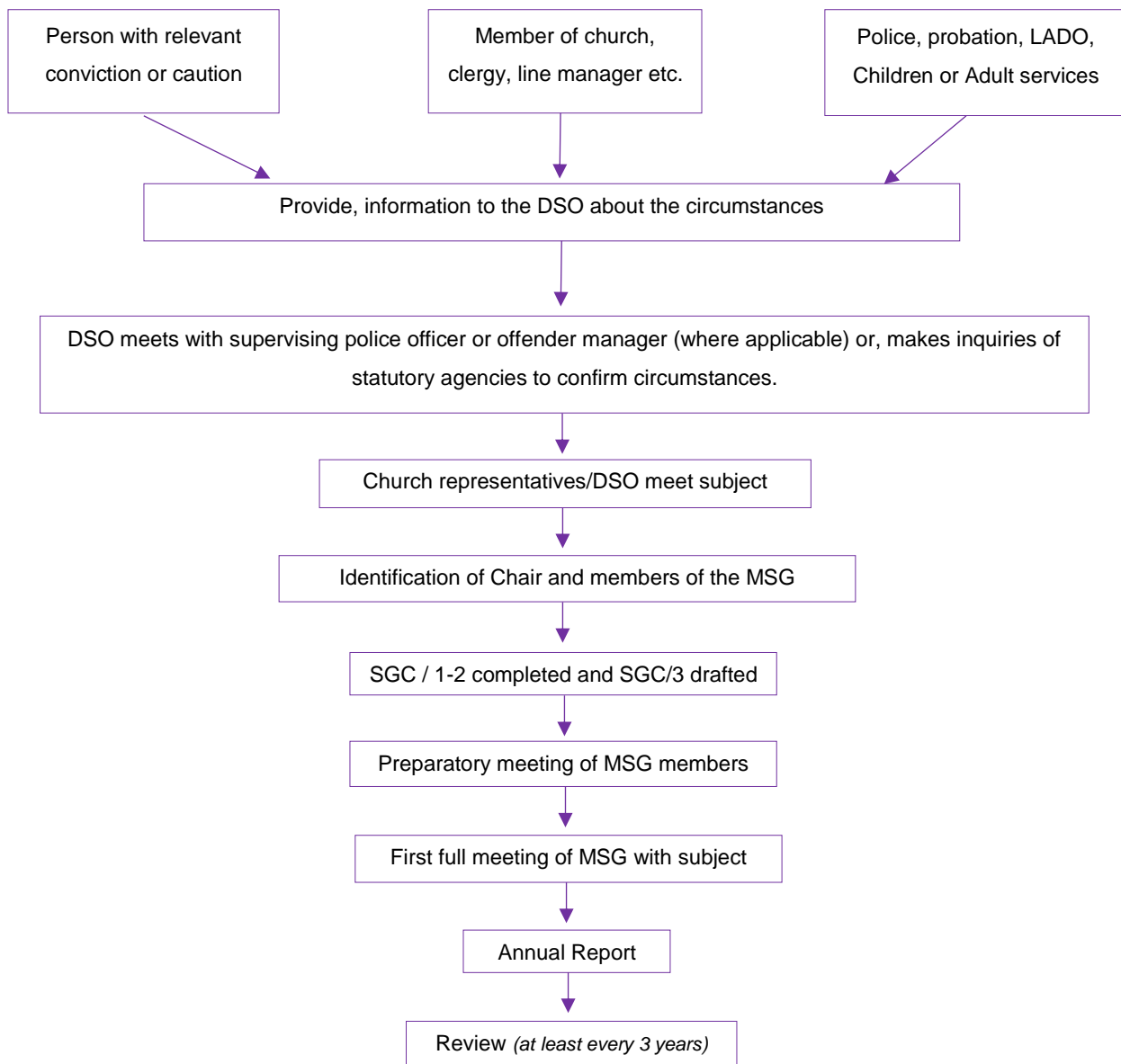
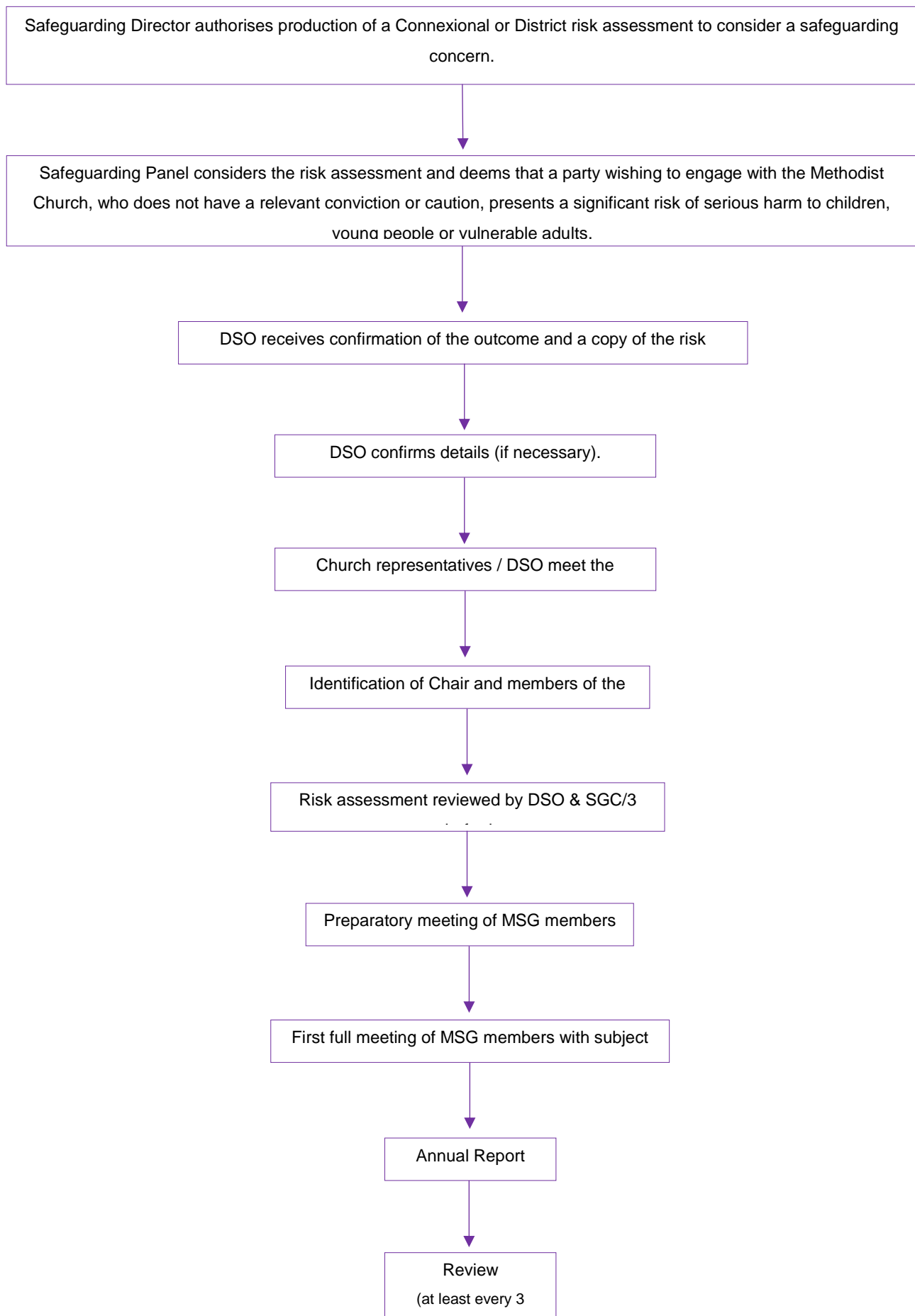


Fig.2 Flow Chart - Setting up a Safeguarding Contract Following a Safeguarding Panel

APPENDIX 6a MODEL CHURCH SAFEGUARDING POLICY

Statement of Safeguarding Principles

It is the Methodist Church's intention to value every human being as part of God's creation and the whole people of God. At the heart of the Methodist community is a deep sense of the place of welcome, hospitality and openness, which demonstrates the nature of God's grace and love for all.

Our church communities are called to be places where the transformational love of God is embodied and life in all its fullness is a gift, which is offered to all people.

Principles

Safeguarding is about the action the Church takes to promote a safer culture. This means we will:

- **promote** the welfare of children, young people and adults
- work to **prevent** abuse from occurring
- seek to **protect** and respond well to those that have been abused.

We are committed to:

- the care and nurture of, and respectful pastoral ministry with, all children, young people and adults
- safeguarding and protecting all children, young people and adults when they are vulnerable
- establishing safe, caring communities, which provide a loving environment where there is informed vigilance as to the dangers of abuse.

We will carefully select and train all those with any responsibility within the church, in line with safer recruitment principles, including the use of criminal records checks through the Disclosure and Barring Service (DBS).

We will respond without delay to every safeguarding concern, which suggests that a child, young person or adult may have been harmed, working in partnership with the police and social services in any investigation.

We will seek to work with anyone who has suffered abuse, developing with them an appropriate ministry of informed pastoral care.

We will seek to challenge any abuse of power, especially by anyone in a position of trust.

Working with the Church Safeguarding Officer, we will support risk assessment of those who present a safeguarding risk within a church environment. We will ensure appropriate pastoral care is offered and measures are taken to address identified risks including referral to statutory agencies, suspension and the use of safeguarding contracts.

In all these principles, we will follow legislation, guidance and recognised good practice.

A Model Church Safeguarding Policy

Safeguarding Children, Young People and Vulnerable Adults Policy for

..... Methodist Church

Purpose

The purpose of the church safeguarding policy is to check that procedures are in place and provide clarity about the roles and responsibilities of those trusted with promoting the church as a safe space for all its users.

This policy was agreed at a Church Council held on

The Methodist Church, along with the whole Christian community, believes each person has a value and dignity which comes directly from God's creation in God's own image and likeness. Christians see this as fulfilled by God's re-creation of us in Christ. Among other things, this implies a duty to value all people as bearing the image of God and therefore to protect them from harm.

..... Methodist Church is committed to the safeguarding and protection of all children, young people and adults and affirms that the needs of vulnerable individuals at risk are paramount.

..... Methodist Church recognises that it has a particular care for all who are vulnerable whether as a result of disabilities or reduction in capacities or by their situation. It is recognised that this increased vulnerability may be temporary or permanent and may be visible or invisible, but that it does not diminish our humanity and our wish to affirm the gifts and graces of all God's people.

This policy addresses the safeguarding of children, young people and vulnerable adults. It is intended to support the church in being a safe supportive and caring community for children, young people, vulnerable adults, for survivors of abuse, for communities and for those affected by abuse.

..... Methodist Church recognises the serious issue of

the abuse of children, young people and vulnerable adults and recognises that this may take the form of physical, emotional, sexual, financial, spiritual, discriminatory, domestic or institutional abuse or neglect, abuse using social media, child sexual exploitation or human trafficking (slavery). It acknowledges the effects these may have on people and their development, including spiritual and religious development. It accepts its responsibility for ensuring that all people are safe in its care and that their dignity and right to be heard is maintained. It accepts its responsibility to support, listen to and work for healing with survivors, offenders, communities and those who care about them. It takes seriously the promotion of welfare so that each of us can reach our full potential in God's grace.

..... Methodist Church commits itself to:

1. **RESPOND** without delay to any allegation or cause for concern that a child or vulnerable adult may have been harmed or may suffer harm, whether in the church or in another context. It commits itself to challenge the abuse of power of anyone in a position of trust.
2. **IMPLEMENT** the Methodist Church Safeguarding Policy, government legislation and guidance and

safe practice in the circuit and in the churches.

3. **PROVIDE** support, advice and training for lay and ordained people to ensure that people are clear and confident about their roles and responsibilities in safeguarding and promoting the welfare of children, young people and adults who may be vulnerable.
4. **AFFIRM** and give thanks for those who work with children, young people and vulnerable adults and also acknowledge the shared responsibility of all of us for safeguarding children, young people *and* vulnerable adults who are on our premises.

Church Council

Legal responsibility for safeguarding rests with the members of the Church Council. The safeguarding officer should be a member of the Church Council or have the right to attend at least annually to report on implementation of the safeguarding policy. Where an individual covers the role in more than one location, they must be able to cover the activities identified in the relevant role outline and be facilitated to attend meetings to report on safeguarding in each location.³

..... Methodist Church appoints

..... Church Safeguarding Officer (Adults)
(name)

and

..... Church Safeguarding Officer (Children)
(name)

and supports them in their role, which is to:

- provide support and advice to the minister and the stewards in fulfilling their roles with regard to safeguarding.
- ensure that a suitable, signed church safeguarding policy is available at all times in the church, along with names of current safeguarding officers, national helplines and other suitable information. This must be renewed annually.
- record all safeguarding issues that are reported to the church safeguarding officer, according to Methodist safeguarding policy.
- promote appropriate routes for reporting of concerns
- identify and inform those who are required to attend safeguarding training and maintain records of attendance. Work with the Circuit Safeguarding Officer and Church Safeguarding Officer to arrange training.
- attend training and meetings relating to the role

³ It is not appropriate for the minister in pastoral charge to hold the Church Safeguarding Officer role because of the potential conflict with their own responsibilities.

- work in partnership with others including stewards and user groups to promote good safeguarding practice on church premises. This may include gaining written confirmation that hirers of church premises are aware of the church safeguarding policy or are using an appropriate policy of their own.
- check that safeguarding is included as an agenda item at all Church Council meetings and report to the Church Council annually.
- inform all those with responsibility for recruitment, whether paid or voluntary, of their obligation to follow safer recruitment procedures.
- advise the Circuit Safeguarding Officer and/or Church Safeguarding Officer of any issues with compliance with safeguarding training, policy or safer recruitment requirements and respond promptly to any request from them about audit of safeguarding activities.

a) Good practice

We believe that good practice means:

- i) All people are treated with respect and dignity.
- ii) Those who act on behalf of the church should not meet or work alone with a child or vulnerable adult where the activity cannot be seen unless this is necessary for pastoral reasons, in which case a written record will be made and kept noting date, time and place of visit.
- iii) The church premises will be assessed by the Church Safeguarding Officer with the property steward and/or their representatives at least annually for safety for children, young people and vulnerable adults and a written risk assessment report will be given annually to the Church Council. This will include fire safety procedures. The Church Council will consider the extent to which the premises and equipment are suitable or should be made more suitable.
- iv) Any church-organised transport of children, young people or vulnerable adults will be checked to ensure that the vehicle is suitable and insured and that the driver and escort (where required) are appropriate. A record should be kept in the church file for each driver/car.
- v) Activity risk assessments will be undertaken before any activity takes place to minimise the risk of harm to those involved. Approval will be obtained from the event leader/minister. A written record of the assessment will be retained securely.
- vi) Promotion of safeguarding is recognised to include undertaking those tasks which enable all God's people to reach their full potential. The Church Council will actively consider the extent to which it is succeeding in this area.

These things are to safeguard those working with children, young people and those adults who may be vulnerable.

b) Appointment and training of workers in the church

Workers will be appointed after a satisfactory criminal records check and following the safer recruitment procedures of the Methodist Church. Each worker will have an identified supervisor who will meet at regular intervals with the worker. A record of these meetings will be agreed and signed and the record kept. Each worker will be expected to undergo safeguarding training, within the first 6 months of

appointment. The other training needs of each worker will be considered (such as food hygiene, first aid and lifting and handling).

c) Pastoral visitors

Pastoral visitors will be supported in their role with the provision of safeguarding training upon appointment. If they are undertaking tasks for which a criminal records check would be required, this will be undertaken prior to appointment.

d) Guidelines for working with children, young people and vulnerable adults

A leaflet outlining good practice and systems should be given to everyone who works with children, young people and vulnerable adults. This leaflet should be reviewed annually.

e) Ecumenical events

Where ecumenical events happen on church premises, safeguarding is the responsibility of this Church Council.

f) Events with church groups off the premises

Adequate staffing, a risk assessment and notification of the event will be given to the church safeguarding officer prior to the agreement for any event or off site activity. Notification of the event will be given to the church council secretary:.....(name of church council secretary)

If the activity is unusual or considered to be high risk the Church Safeguarding Officer will contact the Circuit Safeguarding Officer in order that it can be ratified or any queries raised.

g) Other groups on church premises

Where the building is hired for outside use, the Church Safeguarding Officer should be informed. The Church Safeguarding Officer will keep the records and take advice as appropriate from the Circuit Safeguarding Officer.

h) Complaints procedure

There is a formal complaints procedure within the Methodist Church, which allows concerns to be raised about actions or behaviour by a member or officer of the Church. In addition, employed staff will be subject to relevant contractual procedures. All complaints will be responded to with care, diligence and impartiality.

A complaint should be addressed to the superintendent minister, the Revd. [NAME]. If a complaint is made to another person it should be referred to the superintendent. Meetings will be arranged with the person making the complaint and, usually, the person against whom the complaint has been made, in an attempt to resolve it. If the complaint is against the superintendent, it should be sent to the District Chair, the Revd. [NAME] at [ADDRESS].

Safeguarding officers must be informed of any complaint or issue relating to the potential abuse of children, young people or adults who may be vulnerable. They will support prompt action to respond to the circumstances of any safeguarding concern, whether or not any party involved wishes to make a formal complaint through the Methodist Church.

Review

This policy will be reviewed annually by the Church Council.

Next review date:

i) Definition of Key Terms

- i) A child is anyone who has not yet reached their eighteenth birthday.
- ii) Vulnerable adults: any adult aged 18 or over who, owing to disability, mental function, age or illness or traumatic circumstances, may not be able to take care or protect themselves.
- iii) Safeguarding: protecting children, young people or vulnerable adults from maltreatment; preventing impairment of their health and ensuring safe and effective care.
- iv) Adult/child protection is a part of safeguarding and promoting welfare. This refers to the activity, which is undertaken to protect children, young people and/or adults who are suffering or are at risk of suffering significant harm, including neglect.
- v) Abuse and neglect may occur in a family, a community or an institution. It may be perpetrated by a person or persons known to the child, young person or vulnerable adult or by strangers; by an adult or by a child. It may be an infliction of harm or a failure to prevent harm.
- vi) Worker: anyone working with children or vulnerable adults in the name of _____
Methodist Church, whether in a paid or voluntary capacity.

Signed Chair of Church Council

Dated

APPENDIX 6b MODEL CIRCUIT SAFEGUARDING POLICY

Safeguarding Children, Young People and Vulnerable Adults Policy for
Circuit

This policy was agreed at the Circuit Meeting held on / /

It will be reviewed on / /

1. The Policy

The Methodist Church, along with the whole Christian community, believes each person has a value and dignity which comes directly from God's creation of humans in God's own image and likeness. Christians see this as fulfilled by God's re-creation of us in Christ. Among other things, this implies a duty to value all people as bearing the image of God and therefore to protect them from harm.

The Circuit is committed to the safeguarding and protection of all children, young people and adults and affirms that the needs of children and of people when they are vulnerable and at risk are paramount.

The Circuit recognises that it has a particular care for all who are vulnerable whether by disabilities or by reduction in capacities or by their situation. It is recognised that this increased vulnerability may be temporary or permanent and may be visible or invisible, but that it does not diminish our humanity and our wish to affirm the gifts and graces of all God's people. This policy addresses the safeguarding of children, young people and vulnerable adults. It is intended to be a dynamic policy. It is intended to support the Church in being a safe, supportive and caring community for children, young people, vulnerable adults, for survivors of abuse, for communities and for those affected by abuse.

The Circuit fully agrees with the statement reiterated in *Creating Safer Space 2007: As the people of the Methodist Church we are concerned with the wholeness of each individual within God's purpose for everyone. We seek to safeguard all members of the church community of all ages.*

The Circuit recognises the serious issue of the abuse of children and vulnerable adults and recognises that this may take the form of physical, emotional, sexual, financial, spiritual, discriminatory, domestic or institutional abuse or neglect, abuse using social media, child sexual exploitation or human trafficking (slavery). It acknowledges the effects these may have on people and their development, including spiritual and religious development. It accepts its responsibility for ensuring that all people are safe in its care and that their dignity and right to be heard is maintained. It accepts its responsibility to support, listen to and work for healing with survivors, offenders, communities and those who care about them. It takes seriously the issues of promotion of welfare so that each of us can reach our full potential in God's grace.

The Circuit recognises the serious issue of the abuse of children and vulnerable adults and recognises that this may take the form of physical, emotional, sexual, financial, spiritual, discriminatory, domestic or institutional abuse or neglect, abuse using social media, child sexual exploitation or human trafficking (slavery). It acknowledges the effects these may have on people and their development, including spiritual and religious development. It accepts its responsibility for ensuring that all people are safe in its care and that their dignity and right to be heard is maintained. It accepts its responsibility to support, listen to and work for healing with survivors, offenders, communities and those who care about them. It takes seriously the issues of promotion of welfare so that each of us can reach our full potential in God's grace.

The Circuit commits itself to:

1. **RESPOND** without delay to any allegation or cause for concern that a child or vulnerable adult may have been harmed, whether in the Church or in another context. It commits itself to challenge the abuse of power of anyone in a position of trust. It commits itself to providing informed pastoral care to those in need, including the supervision of those who have committed criminal offences.
2. **IMPLEMENT** the Methodist Church Safeguarding Policy, Procedures and Guidance, government legislation and guidance to achieve safe practice in the circuit and in the churches.
3. The **PROVISION** of support, advice and training for lay and ordained people that will ensure people are clear and confident about their roles and responsibilities in safeguarding and promoting the welfare of children and adults who may be vulnerable.
4. **AFFIRM** and give thanks for the work of those who are workers with children and vulnerable adults and acknowledge the shared responsibility of us all for safeguarding children, young people and vulnerable adults on our premises.

2. Purpose

The purpose of this safeguarding policy is to ensure that procedures are in place and people are clear about roles and responsibilities for children and vulnerable adults in our care and using our premises. It is to be read in conjunction with the Methodist Church Safeguarding Policy, Procedures and Guidance (2020). The full implementation of these policies should ensure that:

- The Church (and all associated activities) is a safer place for everyone.
- Communities we serve have confidence that children and vulnerable adults are as safe as possible and that their wellbeing is enhanced in the life of the Church.
- People in the church are alert to unsafe practices and are able to challenge them.
- Office holders are safely recruited, trained for their roles and are accountable for their activities.
- People who have experienced abuse are accepted, empowered and supported in maintaining control over their lives and making informed choices without coercion.
- People who abuse are held accountable to the law and the risk they pose is managed while they are supported and challenged to address their motivations and behaviour.

3. Roles and Responsibilities

3.1. Circuit Meeting

It is the responsibility of each Circuit Meeting to appoint a Circuit Safeguarding Officer and there should be no gaps in this crucial provision. It is not appropriate for a minister in pastoral charge or circuit superintendent to fill any gap, because of the potential conflict of roles **but an individual safeguarding officer may cover the role in more than one location**. The role will usually be undertaken on a voluntary basis, although expenses should be met. Ultimate responsibility for safeguarding within the circuit lies with the Circuit Meeting. **The circuit safeguarding officer should be a member of the Circuit Meeting or have the right to attend at least annually to report on implementation of the safeguarding policy. Where an individual holds the role in more than one location, they must be able to cover the activities identified in the relevant role outline and be facilitated to attend meetings to report on safeguarding in each location.**

TheCircuit

appoints..... (name) as circuit safeguarding officer (adults) and

.....(name) as circuit safeguarding officer (children), and supports him/her/them in their role.

The circuit meeting holds the following responsibilities, which may be delegated to the Circuit Safeguarding

Officer, if appropriate:

2. Support and advice to the circuit superintendent and the circuit stewards regarding safeguarding matters.
3. With the support of the circuit superintendent, prompt recording and reporting of any safeguarding concerns of which they are made aware. This will include appropriate referral to statutory agencies and DSOs, as required by Methodist Church Safeguarding Policy, Procedures and Guidance.
4. Making appropriate arrangements for the secure storage, retention and appropriate sharing of safeguarding information held by the circuit.
5. Promoting the safety and well-being of all children and vulnerable adults within the circuit.
6. Presenting a report to each circuit meeting about safeguarding events (noting the need for confidentiality regarding specific cases) and reminding relevant parties (where necessary) that safeguarding should be a standing item on the Circuit Meeting agenda
7. Receiving and reviewing church risk assessments and training schedules for each church in the circuit and sharing with the circuit meeting annually.
8. Attending the circuit staff meeting as necessary to discuss concerns brought to their attention.
9. Liaising with individual church safeguarding officers to offer guidance and check they are complying with Methodist Church Safeguarding Policies, Procedures and Guidance. This should include at least one annual meeting.
10. Working with the superintendent minister, ministers and the DSO regarding safeguarding concerns.
11. Attending and active participation at safeguarding training, district safeguarding events and meetings.
12. Work with local ecumenical partners and their safeguarding representatives.
13. Reviewing safeguarding policies for each church in the circuit prior to presentation to the Circuit Meeting.
14. Supporting the circuit superintendent with the annual review of the circuit safeguarding policy and sending a copy to the DSO.
15. Maintaining of a record of all people within the circuit who have received Foundation Module, Foundation Refresher Module (prior to 2020), together with dates of attendance.
16. Ensuring that training is offered to those working with children and vulnerable adults, holding an office of responsibility, or are in other applicable roles as defined in the Methodist Church Safeguarding Policy, Procedures and Guidance.
17. Overseeing timely delivery of appropriate training, in liaison with the Church Safeguarding Officers and accredited Circuit Trainers
18. Advising all churches in the circuit of the requirement to adopt a safer recruitment policy and to carry out required procedures when appointing staff or volunteers
19. DBS verification on behalf of the circuit. 19. Retaining records of names of those at circuit level who have DBS checks.
20. Providing reminders to church safeguarding officers about the need to apply or reapply for checks in accordance with the Methodist Church policy (for updates, the period is currently every five years).
21. Assisting the DSO with setting up Monitoring and Support Groups for those subject to safeguarding contracts and reminding the chairs of groups when reviews are due.
22. Maintaining a directory of useful names and contact details.

3.2. Superintendent Minister

1. Ensure that all churches have appropriate and up-to-date safeguarding policies in place.
2. Support those in pastoral charge in exercising responsibility for the implementation of safeguarding policy and practice.
3. Ensure the provision of pastoral support for those involved in issues of abuse and in the management of those who present a safeguarding risk.
4. Ensure that training opportunities are in place for all workers with children, vulnerable adults, for staff of the circuit and for members of the local churches in the circuit, in accordance with Appendix III of the Methodist Church Safeguarding Policy, Procedures and Guidance.
5. Ensure that the Circuit Meeting appoints a circuit safeguarding officer/s and that the details of each person are passed to the district office.
6. Ensure that the Circuit Meeting reviews this policy annually.
7. Support the circuit safeguarding officer (Adults) and the circuit safeguarding officer (Children) in their work, providing access to resources to enable them to fulfil their functions. Circuit stewards

APPENDIX 6c - MODEL DISTRICT SAFEGUARDING POLICY

Safeguarding Children and Vulnerable Adults Policy for

..... Methodist District

The Methodist District is committed to safeguarding and protecting all children, young people and vulnerable adults and firmly believes that the needs of children or of people when they are vulnerable are paramount.

The Methodist District fully agrees with the

Connexional Team statement reiterated in *Creating Safer Space 2007*: As the people of the Methodist Church we are concerned with the wholeness of each individual within God's purpose for everyone. We seek to safeguard all members of the church community of all ages.

The Methodist District recognises that none of us is invulnerable but that there is a particular care for those whose vulnerability is increased by situations, by disabilities or by reduction in capacities. It is recognised that this increased vulnerability may be temporary or permanent and may be visible or invisible, but that it does not diminish our humanity and seeks to affirm the gifts and graces of all God's people.

The Methodist District recognises the serious issue of the abuse of children and vulnerable adults and recognises that this may take the form of physical, emotional, sexual, financial, spiritual, discriminatory, domestic or institutional abuse or neglect, abuse using social media or human trafficking (slavery). It acknowledges the effects these may have on people and their development, including spiritual and religious development. It accepts its responsibility for ensuring that all people are safe in its care and that their dignity and right to be heard is maintained. It accepts its responsibility to support, listen to and work for healing with survivors, offenders, communities and those who care about them. It takes seriously the issues of promotion of welfare so that each of us can reach our full potential in God's grace.

The Methodist District commits itself to:

1. **RESPOND** without delay to any allegation or cause for concern that a child or vulnerable adult may have been harmed, whether in the Church or in another context. It commits itself to challenge the abuse of power of anyone in a position of trust.
2. Ensure the **IMPLEMENTATION** of Connexional Safeguarding Policy; government legislation and guidance and safe practice in circuits and churches.
3. The **PROVISION** of support, advice and training for lay and ordained people that will ensure people are clear and confident about their roles and responsibilities in safeguarding and promoting the welfare of children and adults who may be vulnerable.
4. It affirms the role of the district safeguarding group.

Purpose

The purpose of this safeguarding policy is to ensure procedures are in place and people are clear about roles and responsibilities for children and vulnerable adults in our care and using our premises. It is to be read in conjunction with the Safeguarding Policy, Procedures and Guidance for the Methodist Church (2020).

a) Roles and responsibilities

District Chair

The District Chair attends the district safeguarding group and should:

- Manage and support the work of the DSO.
- Through the DSO, ensure that superintendent ministers are aware of their safeguarding responsibilities and enable skills training opportunities to be made available.
- Use the expertise and advice of the DSO, district safeguarding group and, as appropriate, Connexional Team personnel.
- Through the DSO, ensure that all circuits and churches create and implement their own policies.
- Support the DSO and the district safeguarding group in their work by ensuring that an independent chair is appointed and that the group are capable of taking forward reports of incidents and allegations promptly and in accordance with good practice.
- Ensure that, where there are district meetings and events, the district policy is implemented.
- Ensure that each superintendent completes an audit/monitoring form after the first Circuit Meeting of each Connexional year confirming that policies are in place in each circuit and church and that these have been annually reviewed. Each superintendent shall send a copy of their circuit's policy to the DSO for scrutiny by the district safeguarding group. The monitoring of this will be a subject of the district safeguarding group's report to the District Council.

Independent Chair of the District Safeguarding Group

As part of the implementation of the recommendations from the President's Inquiry (Safeguarding) 2011, the Methodist Conference affirmed in 2012 that every district must have a group to focus on safeguarding work with children and vulnerable adults and should have an independent Chair, as set out in the Safeguarding Framework (2010), who:

- should be strongly committed to supporting the DSO
- should be well-respected
- should be able robustly to challenge the district where necessary
- should not be the DSO, the District Chair, or a close relative of those fulfilling these roles.

District Safeguarding Group

The district safeguarding group will promote the safeguarding of children and vulnerable adults across the district. This responsibility includes ensuring that:

- The group is independently chaired; its business managed in an effective manner and it has a representative membership of ordained and lay people across the district, including people with experience and/or professional background in safeguarding.
- The group provides support and guidance to the DSO, including confidential advice and discussion on complex cases.
- Any incidents and allegations are followed up or referred on as necessary with the support of the District Chair (NB the responsibility lies with the Chair or the relevant person in pastoral charge).

- A response is provided to requests for help, advice, information and training.
- Programmes of awareness, training and good practice are initiated.
- Publicity is given to its contact numbers.
- District and Connexional policies are effectively implemented.
- The Chair, superintendents and District Council are updated on any changes to safeguarding policy, practice and guidance.
- Two meetings are organised annually to provide support and information on safeguarding issues to superintendents, circuit and church safeguarding officers.
- A report is delivered to the first District Council meeting of each Connexional year by a member of the district safeguarding group, which will include a note on the monitoring of district events.
- Collaborative work is undertaken with other relevant groups (e.g. Connexional, regional and ecumenical partners and professional colleagues) on safeguarding issues.

District Safeguarding Officer (DSO)

The DSO has a key role within the Methodist District and is required to:

- oversee church, circuit and district compliance with the Methodist Church's safeguarding procedures
- be accessible by churches about all safeguarding issues, be fully involved and oversee all situations of concern including the establishment and review of all safeguarding contracts
- liaise regularly with designated officers of the local authority and the police as necessary
- undertake safeguarding risk assessments for the implementation of safeguarding contracts and relating to specific cases
- take a lead on working with individual cases in the district, including representing the Church in meetings with external organisations
- have a clear understanding of the issues facing faith communities as they seek to make their places of worship a safe place for children and vulnerable adults
- be committed to continuing personal development and to the provision of safeguarding training opportunities within the district.

Dated

Signed District Chair

Date for review

APPENDIX 7a - ROLE DESCRIPTOR CHURCH SAFEGUARDING OFFICER

Ultimate responsibility for safeguarding within the church lies with the Church Council.

.....Methodist Church appoints..... (name)

as the church Safeguarding Officer (adults) .

and (name)

as church Safeguarding Officer (children) and supports them in their role, which is to:

- provide support and advice to the minister and the stewards in fulfilling their roles with regard to safeguarding.
- ensure that a suitable, signed church safeguarding policy is in place and renewed annually. It should also be made clear where the policy is displayed, along with names of current safeguarding officers, national helplines and other suitable information.
- record all safeguarding issues that are reported to the church safeguarding officer, according to Methodist policy and procedure.
- promote appropriate routes for reporting of concerns
- identify and inform those who are required to attend safeguarding training and maintain records of attendance. Work with the circuit safeguarding officer and DSO to arrange training.
- attend training and meetings relating to the role
- work in partnership with the lettings officer, stewards and user groups to promote good safeguarding practice on church premises. This will include gaining written confirmation that hirers of church premises are aware of the church safeguarding policy or are using an appropriate policy of their own.
- check that safeguarding is included as an agenda item at all Church Council meetings and report to the Church Council annually.
- inform all those with responsibility for recruitment, whether paid or voluntary, of their obligation to follow safer recruitment procedures.
- advise the circuit safeguarding officer and/or DSO of any issues with compliance with safeguarding training, policy or safer recruitment requirements and respond promptly to any request from them about audit of safeguarding activities.

There is no requirement to have two church safeguarding officers: one individual may agree to undertake safeguarding of both adults and children

APPENDIX 7b - ROLE DESCRIPTOR CIRCUIT SAFEGUARDING OFFICER

The circuit

appoints (name) as

Circuit Safeguarding Officer (Adults) and

..... (name) as circuit safeguarding officer (children), and supports him/her/them in their role.

The circuit meeting holds the following responsibilities, which may be delegated to the Circuit Safeguarding Officer, if appropriate:

1. Support and advice to the circuit superintendent and the circuit stewards regarding safeguarding matters.
2. With the support of the circuit superintendent, prompt recording and reporting of any safeguarding concerns of which they are made aware. This will include appropriate referral to statutory agencies and DSOs, as required by Methodist Church Safeguarding Policy, Procedures and Guidance.
3. Making appropriate arrangements for the secure storage, retention and appropriate sharing of safeguarding information held by the circuit.
4. Promoting the safety and well-being of all children and vulnerable adults within the circuit.
5. Presenting a report to each circuit meeting about safeguarding events (noting the need for confidentiality regarding specific cases) and reminding relevant parties (where necessary) that safeguarding should be a standing item on the Circuit Meeting agenda
6. Receiving and reviewing church risk assessments and training schedules for each church in the circuit and sharing with the circuit meeting annually.
7. Attending the circuit staff meeting as necessary to discuss concerns brought to their attention.
8. Liaising with individual church safeguarding officers to offer guidance and check they are complying with Methodist Church Safeguarding Policies, Procedures and Guidance. This should include at least one annual meeting.
9. Working with the superintendent minister, ministers and the DSO regarding safeguarding concerns.
10. Attending and active participation at safeguarding training, district safeguarding events and meetings.
11. Work with local ecumenical partners and their safeguarding representatives.
12. Reviewing safeguarding policies for each church in the circuit prior to presentation to the Circuit Meeting.
13. Supporting the circuit superintendent with the annual review of the circuit safeguarding policy and sending a copy to the DSO.
14. Maintaining of a record of all people within the circuit who have received Foundation Module, Foundation Refresher Module (prior to 2020), together with dates of attendance

15. Ensuring that training is offered to those working with children and vulnerable adults, holding an office of responsibility, or are in other applicable roles as defined in Appendix III of the Methodist Church Safeguarding Policy, Procedures and Guidance.
16. Overseeing timely delivery of appropriate training, in liaison with the Church Safeguarding Officers and accredited Circuit Trainers
17. Advising all churches in the circuit of the requirement to adopt a safer recruitment policy and to carry out required procedures when appointing staff or volunteers
18. DBS verification on behalf of the circuit.
19. Retaining records of names of those at circuit level who have DBS checks.
20. Providing reminders to church safeguarding officers about the need to apply or reapply for checks in accordance with the Methodist Church policy (for updates, the period is currently every five years).
21. Assisting the DSO with setting up Monitoring and Support Groups for those subject to safeguarding contracts and reminding the chairs of groups when reviews are due.
22. Maintaining a directory of useful names and contact details.

Where a circuit safeguarding officer carries out the above activities, there is a requirement for supervisory oversight, which will be arranged by the superintendent minister and carried out by them or a nominated substitute. Records of oversight meetings will be signed and agreed. Supervision will include consideration of wellbeing and discussions of the areas of activity included within the role on a regular basis.

Superintendent Minister

1. Ensure that all churches have appropriate and up-to-date safeguarding policies in place.
2. Support those in pastoral charge in exercising responsibility for the implementation of safeguarding policy and practice.
3. Ensure the provision of pastoral support for those involved in issues of abuse and in the management of those who present a safeguarding risk.
4. Ensure that training opportunities are in place for all workers with children, vulnerable adults, for staff of the circuit and for members of the local churches in the circuit, in accordance with the Methodist Church Safeguarding Policy, Procedures and Guidance.
5. Ensure that the Circuit Meeting appoints a circuit safeguarding officer/s and that the details of each person are passed to the district office.
6. Ensure that the Circuit Meeting reviews this policy annually.
7. Support the circuit safeguarding officer (Adults) and the circuit safeguarding officer (Children) in their work, providing access to resources to enable them to fulfil their functions.

Circuit stewards

The circuit stewards must ensure that agreed procedures are in place for circuit and ecumenical events that involve children or vulnerable adults.

There is no requirement to have two circuit safeguarding officers one individual may agree to undertake safeguarding of both adults and children

APPENDIX 8 - DISTRICT SAFEGUARDING GROUP

Standards and Criteria

Introduction

The function of the Standards and their associated model criteria is to facilitate District Safeguarding Groups in:

- an overview of the profile of safeguarding in the district,
- enabling evaluation of safeguarding
- assisting in determination of priorities
- supporting the development of a strategic plan.
- enabling review of progress against the plan

Each standard has a number of criteria linked with it to assist in the determination of whether a given standard is being reached. These criteria are being suggested as model criteria which may need to be modified in the light of the local context.

Standard 1: The DSG understands the context of the district and monitors the Safeguarding issues with which the Methodist Church is involved within the District

Criteria:

- The DSG is aware of the demographic and organisational profile of the District and has information on
 - Number of churches, by circuit across the District
 - Number of Church Members and Circuit Meeting members, by circuit.
- The DSG receives periodic Safeguarding data from the DSO on:
 - The number of current Safeguarding contracts and a summary of the types of concern that resulted in the Safeguarding contracts.
 - The number of contracts that have not been reviewed within the last 12 months.
 - The number of referrals made to statutory agencies and the number of referrals received from statutory agencies.
 - Number of risk assessments undertaken by the DSO.
 - Number of Connexional risk assessments undertaken within the District.
 - The DSG is advised of concerns arising from the data about the failure to implement Safeguarding policy within the District.

Standard 2: The quality of Safeguarding practice across the District is consistent with both Connexional Safeguarding Policy and Practice and relevant government guidance and legislation.

Criteria:

- The DSG is briefed about legislative changes and new guidance.
- The Safeguarding data arising from Standard 1 is reviewed by the DSG.
- The DSO advises the DSG of any issues with regard to the implementation of policy or procedures.
- The DSG notes policy or procedural issues raised by the DSO and subsequently reviews any agreed action to ensure appropriate Safeguarding actions are understood and in place.
- A quality review of a sample of cases involving the DSO is undertaken on an annual basis.
- The DSG has a scrutiny function and a strategic plan for the development of practice in line with these Standards and Criteria.

Standard 3: Support is provided to all Circuits in implementing District and Connexional Safeguarding policies and procedures;

Criteria:

- Advice and support is available to Circuits and churches through the DSO.
- The role and availability of the DSO in providing advice and support is understood.
- Arrangements are in place for regular discussions between the DSO and Circuit Safeguarding Officers.
- The DSG is advised of issues arising from discussions with Circuit Safeguarding Officers.

Standard 4: The DSG through the District Chair requires churches to consider the needs of, and their response to survivors.

Criteria:

- There is a prompt and respectful response to all concerns about abuse.
- Opportunities are taken to help churches to understand the experiences of survivors and consider how they are made welcome and supported.
- At Connexional, District, Circuit and Church levels consideration is given to how people are equipped to support survivors.
- People providing support to survivors are in turn supported and consideration is given to the appropriate level of supervision for them.
- The development of survivors support groups is promoted.
- Links are developed with other organisations providing support in this area of work.

Standard 5: Good practice in the Safeguarding of children, young people and vulnerable adults across the District is consistently promoted. All necessary information is disseminated at a local level to support this work.

Criteria:

- All individuals, whether paid staff or volunteers with roles that bring them into contact with children or vulnerable adults have received Safeguarding training at foundation or advanced levels, appropriate to their role in compliance with Methodist Policy
- Church Council members and Circuit Meeting members who are not mandated to receive training are encouraged to attend training for the Foundation Module of *Creating Safe Space*. Numbers of those who have attended appropriate training are collated
- Safeguarding contact information is on display in each church premises and on church and Circuit websites.
- A programme of audits or other means of assessment is instituted to establish compliance, good practice and issues that require attention.
- Examples of good safeguarding practice are identified and shared across the district
- Any new or ongoing multi-denominational collaborative Safeguarding practices within District are identified and these developments are shared.
- A dip sample of a year's DBS checks is undertaken to confirm timeliness and follow up on application process.

Standard 6: The DSG, through the work of the DSO ensures that safeguarding contracts are in place for those in the church community who could pose a risk of harm to others or who have caused harm in either church or other settings.

Criteria:

- The DSO takes the lead in establishment, management and oversight of safeguarding contracts

- There is effective and appropriate communication between the DSO and churches where safeguarding contracts are in place.
- Monitoring and Support groups understand their role, have received training and on-going support in this task.
- Safeguarding Contracts are reviewed annually as a minimum and amended as necessary.
- Risk assessments are undertaken where safeguarding contracts as per policy, are no longer required.

Standard 7: Changes to Safeguarding policies, practices and guidance are disseminated at all levels across the District

Criteria:

- Processes are in place to ensure that changes in Safeguarding policy, practice and guidance are notified to:
 - Superintendent Ministers
 - Presbyters and Deacons
 - Circuit Safeguarding Officers
 - Church Safeguarding Officers
 - Circuit Meetings
 - Church Councils
 - Trainers delivering training of both Foundation and Advanced Modules
- Changes are posted on the District website.

Standard 8: The District Safeguarding Group is satisfied that safer recruitment procedures are being followed throughout the District.

Criteria:

- Periodic discussions take place with Superintendents and Circuit Safeguarding Officers on the use of safer recruitment procedures and the implementation of these procedures in recruitment to both employed and volunteer roles.
- Safer recruitment procedures are referenced in foundation and advanced module training.
- Safer recruitment procedures are adhered to for all roles.

Standard 9: The DSG promotes programmes of awareness and good practice are initiated and delivered.

Criteria:

- Periodic events focussing on good practice are organised that are open to Church Safeguarding Officers, Circuit Safeguarding Officers, Presbyters, Deacons and others with a commitment or interest in Safeguarding.
- Foundation and Advanced Module training takes account of new developments and re-affirms good practice.

Standard 10: Safeguarding training is promoted and provided in the District in accordance with statutory and Connexional requirements, working together with the regional Learning Network

Criteria:

- The District has a plan to deliver Advanced Module training in a way that matches the training needs with the resources available.

- The delivery of the plan is monitored and the DSG is advised of necessary adjustments. The number of Advanced module training event provided each year is reported on.
- Each Circuit has a plan for the provision of training for the Foundation Module, and information is provided on the number requiring training and the number of Foundation module events held each year.
- Circuit Safeguarding Officers provide periodic reports on the progress of Foundation Module training.
- All those who deliver Safeguarding training are properly equipped for the task.
- The quality of Safeguarding training is audited.

Standard 11: The DSG promotes partnership work with other relevant groups (e.g. Connexional, regional and ecumenical partners and professional agencies) on Safeguarding issues:

Criteria:

- Opportunities to develop projects in conjunction with other groups, agencies and Districts on key issues, are actively sought.
- The DSO is involved in ecumenical Safeguarding discussions with other denominations.
- Links are maintained with Safeguarding Children's Partnerships and Safeguarding Adults Boards
- The DSO maintains good links with key professionals in statutory agencies.

Standard 12: the expertise of the Group is maintained through both its membership and the delivery of a programme of training and development

Criteria:

- The membership of the DSG is periodically reviewed and steps are taken to recruit members with relevant professional expertise in Safeguarding (e.g. Police, Probation, Children's Services, Health)
- A development programme for the DSG is in place, delivered and reviewed.

Standard 13: The DSG through the District Chair ensures that the DSO is supported and equipped for the role

Criteria:

- There is a comprehensive induction programme for new appointments to the role of DSO, developed in conjunction with Connexion, DSG and the learning network.
- Casework supervision is provided for the DSO at a frequency that matches the needs. This includes the opportunity for reflective practice.
- New DSO's receive induction and the necessary resources to enable them to undertake their role. This includes office equipment and an organisational email address
- The DSO is supported in the role through casework supervision and effective line management
- The DSO has opportunities for professional development, provided by Connexion and also through the District Chair.

APPENDIX 9

SAFEGUARDING TRAINING ATTENDANCE LIST



Foundation 2020 Edition

Core List – Required Attendance 2.0

- presbyters with an active preaching or pastoral ministry
- deacons with an active preaching or pastoral ministry
- pre-ordination students and probationers
- lay employees and volunteer workers with pastoral responsibility
- pastoral visitors
- anyone working with children in the name of the Church
- anyone working in activities targeted at adults who are vulnerable (e.g. luncheon club for the housebound)
- church stewards
- circuit stewards
- local preachers should enrol and complete the Foundation Module at the earliest opportunity after receiving a Note to Preach. Both Foundation and Advanced modules must be completed by the end of the second year of training and before their second interview on trial, whichever occurs first.
- worship leaders should enrol and complete the Foundation Module at the earliest opportunity after commencing training. Both Foundation and Advanced modules must be complete by the end of the second year of training and before their appointment by the Church Council, whichever occurs first.
- church and circuit safeguarding representatives
- choir/music group/drama leaders – where there are children or vulnerable adults in the group.
- district staff especially policy committee members, complaints and discipline, mediators
- core teaching staff at Methodist Church Training Institutions
- Connexional staff with direct safeguarding links e.g. children and youth workers
- monitoring and Support group members (for safeguarding contracts/Covenant of Care Agreements)
- young Leaders (ages 16-18) • members of the Safeguarding Committee.

Warmly invited but not mandatory:

- leaders of other groups or organisations that regularly hire or use Methodist premises for work with children and vulnerable adults but do not have access to safeguarding training elsewhere and do not have their own safeguarding policy
- remaining Choir/music group/drama leaders
- any other group leaders within the church, who may have adults who are vulnerable within their group
- property stewards and other keyholders
- caretakers
- church/circuit meeting secretaries
- church/circuit/district administrators
- remaining District and Connexional staff
- remaining teaching staff at Methodist Church Training Institutions

Recognition of Church of England Training

The Methodist Church recognises the Church of England Foundation Module (previously called C1) as equivalent and qualifying training to the Foundation Module. Therefore, those who have undertaken that Church of England course will have satisfied attendance requirements listed above in the Methodist Church.

Renewing Training

The requirement to renew training every four years will only apply to the highest level of safeguarding training undertaken by any individual. If the highest level of training is Foundation Module, then a repeat of this module will be necessary after four years. The 2016 Conference decided that the frequency of undertaking Creating Safer Space training should change from five to four years from September 2017 in order to make sure that training content can keep pace with changes in legislation and safeguarding practices. Link to the conference report:

<http://www.methodist.org.uk/downloads/conf-2016-30-Safeguarding.pdf>

Advanced Module 2019 Edition (Formerly Leadership Module)

As agreed by the 2016 Methodist Conference and updated following January 2017 Methodist Council and the April 2019 Methodist Council.

<https://www.methodist.org.uk/downloads/conf-2016-34-Past-Cases-ReviewImplementation.pdf>

https://www.methodist.org.uk/media/11052/counc_mc19-52_safeguardingpolicy_apr_2019.pdf Core List – Required Attendance

Core List – Required Attendance

- safeguarding officer – District
- safeguarding officer – Circuit
- safeguarding officer - Church
- members of the District Safeguarding Group
- members of the District Policy Committee
- all presbyters or deacons with an active preaching or pastoral ministry (including supernumerary ministers)
- those who are in paid employment or a voluntary role which includes leadership within the Methodist Church, involving direct work with children, young people or vulnerable adults
- those with responsibility for supervision (either training or trained and accredited under the Methodist Church Reflective Supervision Policy 2021-26)
- lay persons who are appointed to exercise pastoral leadership within a local church
- local preachers should enrol and complete the Advanced Module at the earliest opportunity after receiving a Note to Preach and completing the Foundation Module. Both modules must be completed by the end of the second year of training and before their second interview on trial, whichever occurs first
- worship leaders should enrol and complete the Advanced Module at the earliest opportunity after commencing training and completing the Foundation Module. Both modules must be complete by

the end of the second year of training and before their appointment by the Church Council, whichever occurs first

- those who deliver the Foundation Module
- evangelism/mission enablers
- circuit stewards
- members of the Connexional Complaint Panels, Discipline Committees, Pastoral and Appeals Committees
- those in recognised roles involving pioneering, fresh expressions or evangelism
- mentors for the Youth Participation Scheme
- members of the Safeguarding Committee.

Warmly invited but not mandatory:

- supernumerary ministers apart from those who have an active preaching or pastoral ministry.

Recognition of Church of England Training

The Methodist Church recognises the Church of England Leadership Module (previously called C2) as equivalent and qualifying training to the Advanced Module. Therefore, those who have undertaken that Church of England course will have satisfied attendance requirements listed above in the Methodist Church.

Renewing Training

The requirement to renew training every four years will only apply to the highest level of safeguarding training undertaken by any individual. If the highest level of training is Foundation Module, then a repeat of this module will be necessary after four years. The 2016 Conference decided that the frequency of undertaking Creating Safer Space training should change from five to four years from September 2017 in order to make sure that training content can keep pace with changes in legislation and safeguarding practices. Link to the conference report:

<http://www.methodist.org.uk/downloads/conf-2016-30-Safeguarding.pdf>

APPENDIX 10

**EXTERNAL USERS’
SAFEGUARDING POLICY
DECLARATION AGREEMENT**



The Methodist Church Policy Declaration Agreement

The purpose of this agreement is to confirm safeguarding policy arrangements between

..... name of organisation and

..... Name of church

The(*name of organisation using premises*) is committed to safeguarding and protecting all children, young people and vulnerable adults and agrees to:

Fully implement the safeguarding policy of (*name of church*)

OR

Will adhere to and implement the policy of (*name of organisation*)

while using the premises of (*name of church*).

Please delete as appropriate.

Signed:

Print name:

Organisation name:..... Date:.....

Signed:

Print name:

Church name:..... Date:.....

APPENDIX 11

INFORMATION SHARING AGREEMENT TEMPLATE



The Methodist Church Information Sharing Protocol Agreement

1.0 The purpose of the information sharing agreement is to support effective sharing of information between districts, circuits and individual churches and external statutory organisations. As a member of the Connexion, each district, circuit and church is subject to procedures set out in the Church's safeguarding policy document.

Information sharing is fundamental to the Church's commitment to promote a safer culture and to:

- **promote** the welfare of children, young people and adults
- work to **prevent** abuse from occurring
- seek to **protect** and respond well to those that have been abused.

2.0 Each organisation must take responsibility for its own decisions to share or not to share data and must ensure that it is appropriately authorised by the relevant individual who has responsibility within their agency. In addition, each Partner must decide the type and extent of what data and with whom it is appropriate to share in any given situation. Any decision not to share information must be expressed in written format with a full explanation for the reasons the request has been refused. The organisation in receipt of the data must only use the information for the purpose originally stated on the request form.

3.0 It is the responsibility of each organisation to have policies and procedures in place in respect of the secure storage, protection and recording of all personal and special category data obtained from external partners in line with their duties under GDPR and Data Protection Act 2018. This also includes security when transferring and exchanging information. Details of the methods of transfer used and the relevant security measures must be detailed on the data request form.

4.0 THE PRINCIPLES FOR EFFECTIVE INFORMATION SHARING

Information sharing should take place in circumstances where there is a clear need for the exchange of information. The principles below are intended to support practitioners to understand how to share information to promote effective safeguarding of vulnerable people:

- **Adequate** - information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- **Relevant** - only information that is relevant to the purpose should be shared with those who need it.
- **Limited** - when taking decisions about what information to share practitioners should first consider how much information needs to be released. The key principle of the Data Protection Act 2018 and GDPR is that sharing data should be limited to what is necessary and **must be proportionate to the need and level of risk**. Therefore, practitioners should carefully consider the impact of disclosing information about the data subject and/or any third parties.
- **Accurate** - information should be accurate and up to date and clearly distinguish between fact and opinion. Again, this is a key principle of the GDPR and Data Protection Act 2018. Timely- information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protect children and adults at risk.
- **Secure** - information should be shared securely and practitioners must always follow their organisation's policy on security for handling personal information.
- **Record** – information-sharing decisions should be recorded regardless of whether the decision is made to share or not. This record should include the rationale for the decision what information has been shared and with whom in line with organisational procedures. If

the decision is not to share the reasons should be recorded. In line with each organisation's retention policy, the information should not be kept any longer than necessary. In some cases, this may be indefinitely e.g. as directed by the IICSA Inquiry.

4.1 Information sharing can take place in a number of ways:

- **Disclosure** – for example, a district/circuit/church acknowledges that it possesses relevant data. It may make that data accessible to a requesting agency but ownership and responsibility remains with the district/circuit/church.
- **Sharing** - districts/circuits/churches pool available data and maintain individual records.
- **Exchange** – one district/circuit/church provides one or more other external agencies with relevant data. Ownership and responsibility passes to the new agency, which may amend or update the record to meet further requirements.
- **Reporting** – a district/circuit/church or the Connexion provides statistical data for an agreed reporting mechanism, which may be reported to local and national groups e.g. the IICSA Inquiry.

Practitioners should use their judgement when making decisions about what information to share and should follow organisational procedures. The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child or adult including others who may be at risk. If a practitioner is uncertain about what to do at any stage, advice should be sought, and the outcome of the discussion should be recorded.

Data Sharing Request Form

For use by the organisation making a request for information for the purpose of safeguarding in line with legislation.

Please complete and send this form to [\[insert email address\]](#).

Data Sharing Request Form

Name of district/circuit/church to whom request is addressed	
Name of organisation making request	
Name and position of person requesting data	
Date of request	

Description of data requested

--

Purpose of sharing Lawful

--

Are there any circumstances in the requested sharing that might result in the risk to individuals? How will these risks be mitigated?

--

How the information will be disclosed *Please enter the details for how the information should be disclosed i.e. use of secure post, encrypted email etc.*

--

Disclosure agreed <i>tick as relevant</i>	Yes		No	
Reasons for sharing/not sharing				
Disclosure authorised by:				
Data disclosed by <i>Print name:</i>				
Signature:				
Recipient signature:				

APPENDIX 12

Responding to Police Requests to Share Information

Guidance and Procedures



RESPONDING TO POLICE REQUESTS FOR INFORMATION

INTRODUCTION

This guidance and the associated procedures outline the general protocols for working with the police and other law enforcement agencies. It explains the principles the Church needs to consider, when asked to release personal and sensitive information relating to an individual, whether this is with the consent of the individual or in a situation where information is disclosed without an individual's explicit consent. The guidance is in line with the Church's responsibility to handle, process and store data responsibly in compliance with the eight data principles of the Data Protection Act [1998] and UK GDPR.

This document is intended as guidance that is relevant to the current law and procedures, which are related to information held by the Methodist Church. For the purposes of this guidance, the word *information* is interchangeable with the alternative word *data*. The identification of information that requires the application of this guidance is key. This document applies to **any information** held about an individual. How the Church has gathered and retained the information about a person also influences the lawful pathway by which such data can be shared.

Information can be shared provided the lawful mechanisms governing its provision are understood and followed. The lawful mechanisms for sharing information require intelligent and considered communication between the information holder and the organisation requesting it. For instance, it is not simply a case of the police asking for the data and the Church automatically surrendering the information. The Church must intelligently consider the context of the request, the scope of the request, the relevancy of the request and the necessity of sharing information concerning a person.

When information is requested, it must be done so in writing and the document containing the request should be authorised by a senior police officer. The document must, amongst its content, specify the reason(s) why the information is being sought and how it may contribute to some very specific lawful purposes. Furthermore, the document must indicate why the requesting organisation(s) investigative efforts will be prejudiced if the information is not provided.

Upon receipt of a request, the Church should contemplate how an individual's consent or even knowledge of their data being shared must be carefully considered. The sharing of information about an individual can take place with or without their consent or knowledge but there are occasions when disclosing the existence of a request by the police may seriously hinder their investigation.

The most significant messages in this guidance are:

- The Church should treat all requests for information about a person carefully.
- The Church can elect to share information about a person but a decision to do so must be within the legal framework that allows such and should document the legal basis of the disclosure.

- The Church is an active participant in the process of information sharing and the Church's decisions should be based upon the specific circumstances of each request.

1.1 Working with the police and other law enforcement agencies is vital for ensuring the detection and prevention of crime and is essential for the purposes of law enforcement and public protection. Working with the police and other law enforcement agencies or statutory bodies ensures the Church also receives information that may have an impact on its own assessment of an individual and risk.

The Church recognises that individuals have specific rights in relation to their personal information being held by the Church. The Church will balance the rights of the individual and always aim to share 'person-identifiable confidential data' with the individual's express consent, unless a legal or statutory requirement applies for the disclosure to be made without the express consent of the individual.

1.2 The Church recognises the risks associated with the disclosure of sensitive information:

- Mishandling data can cause harm and distress to families and children, and put them at risk
- Complaints or possible court action by affected individuals
- Damage to an organisation's reputation, including loss of trust by members of the public
- Enforcement action by the Information Commissioner's Office, which can include fines of up to £500,000 for serious breaches of the Data Protection Act.
- Non-Compliance with UK GDPR

2. Police Requests for Personal information

2.1 Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1)(d) enables the police and other authorised agencies to request personal data about specific individual(s) from the Church where failing to do so would be likely to prejudice:

- the prevention or detection of crime
- the apprehension or prosecution of offenders

Or

- in emergency situations the Data Protection Act [1998] also allows the release of personal data about an individual in an emergency (e.g. in cases of accident, medical and next-of-kin situations) and in order to protect the vital interests of that individual or another individual)

Note: The below exemptions in The Act are not blanket exemptions; they must be applied on a case-by-case basis.

2.2 Schedule 2 Part 1 Para. 2 or Para. 5 Data Protection Act 2018 provides police and authorised agencies with the means to request information. It also provides the Church

with the authority to either release or decline the release of personal data without the explicit consent of the individual(s).⁴

- 2.3** Schedule 2 Part 1 Para. 2 or Para. 5 Data Protection Act 2018 allows the Church to disclose personal data on specific individual(s) to the police if the Church is convinced that failure to disclose the information would prejudice a police investigation.

Note: Schedule 2 Part 1 Para. 2 or Para. 5 Data Protection Act 2018 provides the Church with a possible basis for lawful processing. The onus of making that assessment as to lawfulness rests with the Church. Careful consideration of the data and our obligations are necessary. It is proper to seek clarification from the police, that the basis for seeking the information is legitimate. The legitimacy of a request extends to careful consideration of whether the information sought is relevant to the nature of the investigation or 'emergency'. For example, is the information necessary to the investigation and proportionate to its aims; is the request appropriately detailed for the Church to both understand it and then properly account for its decision-making process to the release of or not some or all for that being sought?

Common Problems with Police Requests

1. **Police fail to make a written request for information.** Police forces have standard Schedule 2 request forms. Each request for data should be signed in handwriting by an officer of the rank of inspector or above.
2. **Police request extensive information:** Police may serve DPA requests seeking '*all material held*'. The Church can lawfully provide appropriate and proportionate information, if that information is necessary for the purpose stated in the DPA request form - but it may not be necessary or proportionate to share **all** information held on that individual. Police should be specific about which information they require. [It may be necessary to have a discussion with police about the content of the information held by the Church].
3. **Police request material that can be obtained elsewhere:** e.g., Information has been provided previously or can be obtained from another source (for example, another police force holds the information).
4. **Insufficient information to show lawful basis:** The DPA request should be clear on how the material sought will assist the investigation, simply stating that 'an investigation is ongoing' is unlikely to be convincing - the categories and extent of the information requested should not be open-ended, and should be proportionate to the purpose.
5. **Providing information to the Church will prejudice the investigation** – in rare cases, providing detailed information of a very serious crime may compromise the investigation. For such 'unexplained' requests the counter-signatory on the request should hold the rank of superintendent or above. **Note:** The Information Commissioners Office states: *If the necessity or urgency appears unjustified, the onus is on the police to provide as much clarity as they can without prejudicing their investigation.*

⁴ Where possible the explicit consent of the individual should be obtained in order to share information. However there are circumstances where this may not be appropriate. The police will advise whether seeking consent is likely to prejudice the investigation.

Questions to Consider:

1. Specifically what information do police seek?
2. How is this information going to assist police to prevent or detect a crime or apprehend or prosecute an offender?
3. If I do not release the personal information, will this significantly harm any attempt by the police to prevent crime or apprehend a suspect (The risk must be that the investigation is likely to be significantly harmed if you do not release it.)
4. Does the material involve Special Procedure Material? [See below]. If so, consider advising police to apply for a Production Order.
5. If I do decide to release personal information to the police, what is the minimum I should release for them to meet the criteria?
6. What else (if anything) do I need to know to be sure that the exemption applies?
7. How do I know who this person is? (If the request is pre-empted by a telephone call, call the officer back via switchboard).
8. How am I going to respond and deliver any information to the police? Is the method of transmission suitable and secure?
9. Has the request for information included whether the agency seeking the data does or does not want the subject of the request informed of their inquiry?
10. Do I need to seek any information from the agency to clarify their rationale on this point? What is my position on disclosure or not to a subject included in an agency's request?

Special Procedure Material

The definition of Special Procedure Material can be found within section 14 of Police and Criminal Evidence Act 1984. It includes:

Material acquired or created in the course of any trade, business, profession or other occupation for the purpose of any paid or unpaid office that is held:

- a) subject to an express or implied undertaking to hold it in confidence; or,
- b) subject to a restriction or obligation such as those mentioned in section 11 (2)(b) for example a legislative obligation of secrecy.

In the Church Setting:

Material acquired or created in the course of the subject's occupation for the purpose of any paid or unpaid office that is held: this could be the role of minister, lay preacher, or volunteer, etc.

Subject to an express or implied undertaking to hold it in confidence: information has been gathered during a confidential process [e.g. both the safeguarding process and/or the complaints process are confidential processes]. This could also relate to information gathered during pastoral support.

In these cases, consider informing the officer we are happy to provide this information but given the nature of the material they seek, we would like them to obtain a Schedule 1 PACE Production Order.

3. GROUNDS ON WHICH THE CHURCH MAY DECLINE TO RELEASE THE REQUESTED PERSONAL INFORMATION:

If the Church has genuine concerns about releasing personal information and believes that the disclosure of data about an individual is causing or is likely to cause substantial and unwarranted damage or distress to the individual(s); the Church may refuse to provide the information. In such circumstances, the police or other law enforcement agency may seek to obtain a Court Order requiring the Church to release the information. The Church should be informed if the police seek a Court Order and provided the opportunity to present its perspective about the potential impact of sharing the information. This is achieved by providing the police with a formal document to be provided to the Court at the time of the application or, by the Church attending the hearing to provide an 'in-person' account to the Judge.

The Church may also refuse the request on the basis that:

1. The Church has other relevant legal obligations
2. The disclosure of the information may be in conflict with the legitimate rights of others
3. Someone's safety may be put at risk by releasing the information

If a Production Order is obtained, then the Church will either obey that Order or the Church may ask for the order to be varied or revoked because:

- a) There has been a material change of circumstances since the order was made; or
- b) The facts on which the original decision was made were (innocently or otherwise) misstated.

INFORMATION SHARING OUTSIDE DATA PROTECTION ACT

There are a number of legal gateways that enable sharing of information, for example:

Court orders - These include Police and Criminal Evidence Act, 1994 applications and applications in respect of coroners' investigations (Coroners and Justice Act 2009).

Safeguarding - Information must be shared for child or vulnerable adult safeguarding purposes (for example, under s.47 Children Act 1989). The statutory guidance in Working Together to Safeguard Children sets out how different agencies should work together and share information in order to safeguard the welfare of children. Social work and education professionals apply this guidance in their day-to-day work and are obliged to share information with relevant agencies including the police in this context.

SCOTLAND

The Criminal Procedure (Scotland) Act 1995 pertains to Scottish criminal procedure – **not** whether information can lawfully be provided to Police Scotland. This Act does not require, nor provide any

basis compelling an organisation (in Scotland or England and Wales) to provide information to Police Scotland.

Instead, it sets out the procedure that must be followed to enable Police Scotland to enter documentary evidence that it receives from organisations (in Scotland or England and Wales) into evidence in Scottish criminal proceedings.

An 'enquiry response document' is drafted in such a way such that it complies with procedural requirements in the Act so that if required, Police Scotland can introduce the information provided in the response into evidence.

Police Scotland can lawfully receive information from any person in the format requested or, an alternative format provided it complies with the General Data Protection Regulations / Data Protection Act 2018.

Every effort should be made to cooperate with police enquiries while balancing the needs of the individuals concerned, and the reputation of the Church.

APPENDIX 13 - Safeguarding Guidance for Local Ecumenical Partnerships (LEPs)

Introduction

Local Ecumenical Partnerships (LEPs) are created when Christian denominations work together under a formal agreement. The most common of these is when denominations come into partnership by setting up a single congregation. Other examples include when they share a church building, or when they co-operate in chaplaincy. In the case of a single congregation LEP, a standard Constitution, approved by the Charity Commission, must be drawn up. However, all LEPs are charities regulated by the Charity Commission. For more information, please see the [Churches Together](#) website.

There are, of course, practical challenges that arise in relation to churches with different policies, procedures and denominational requirements. This is particularly heightened when it comes to safeguarding, with the need to communicate and manage what can be sensitive matters between members of the clergy, paid and volunteer officers and church members. A clear commitment to safeguarding will ensure that LEPs are able to operate to high standards of practice and take the necessary actions to make our churches safer spaces for all.

1. Supporting Good Practice within LEP's

This guidance recognises the diversity that can exist both organisationally and structurally between denominations which can comprise an LEP. Nevertheless, clear decision making, effective joint working and appropriate communication between LEP member churches is needed to ensure the safety of all who are involved with the church and its activities.

Safeguarding officers have a commitment to providing churches with professional and timely safeguarding support. Each denomination has its own policies and procedures and requires churches to adopt these at a local level.

In an LEP setting, agreement on which denomination's safeguarding policy to follow is crucial to enable appropriate communication between denominational safeguarding teams as required. Commonly the adopted policy will be that of the denomination of the presiding member of clergy.

Within any one denomination, there exists a significant number of roles. For the purpose of this document and the avoidance of doubt, the term Church Officer is used to cover any role within the church whether paid or unpaid, lay or ordained or elected. The term safeguarding officer includes safeguarding adviser.

2. Choosing which safeguarding policy to use in an LEP

When an LEP is established or, where the LEP wishes to review its safeguarding arrangements, the trustees should agree which denominations' safeguarding policy they will adopt. The safeguarding policy and procedures adopted must be acceptable to all participating denominations.

There are some pragmatic considerations that can help with this decision:

- Which denomination does the church most closely identify with?
- Which denomination provides the ordained member(s) of clergy at the point of deciding the policy?

- Where does the church go to for support on other governance matters?
- Does the decision-making model of the church fit more closely with any one denomination?
- Who owns the building and what are the requirements of the church insurer(s)?

It is recommended that at the point of deciding upon a policy, (for ratification by the denominations' relevant authorities – see below), the rationale is included at the point of submission for approval.

The trustees of the LEP should adopt the safeguarding policy and guidance of one of the participating denominations and apply that in all aspects of safeguarding practice.

The safeguarding policy and procedures (and any subsequent amendments) must be ratified by the relevant authority of each participating denomination. A copy of, or electronic link to the ratified policy must be sent to the safeguarding officer nominated by the relevant authority for each participating denomination. Safeguarding teams of all member denominations need to be informed which policy the LEP has adopted, and once that decision is made, the LEP must adhere to the adopted policy.

Safeguarding teams in each denomination must understand and work within the policy and procedures an LEP has adopted, particularly where these procedures are different to their own. They will of course liaise with their denomination upon any matters of concern but should take advice on matters of policy from the denominational safeguarding team who are responsible for the safeguarding policy.

3. Church Safeguarding Officers and Trustees

The Charity Commission are clear that safeguarding is the responsibility of all trustees. It is recommended that a safeguarding trustee is appointed, however it should be clear that they are not to be the only person among the trustees who understands and is responsible for safeguarding.

Each LEP must appoint a Safeguarding Officer/Designated Person who has appropriate safeguarding knowledge, skills, and experience to whom the trustees can delegate duties. The Safeguarding Officer will act as a contact point for all safeguarding matters and take responsibility for addressing issues of policy, procedures, training and reporting. Trustees must be able to ensure that delegated authority is being properly exercised, through appropriate monitoring and reporting procedures.

Training is available for safeguarding officers and trustees in all denominations and this should align with the adopted denominational policy.

4. DBS Checking

Each LEP should appoint at least one DBS verifier who will be expected to carry out DBS checks at the level and timeframe specified in the policy and procedure as required by their own denomination. All denominations publish guidance on DBS checks, and most denominations use an umbrella organisation through which checks can be carried out. Each LEP should use the DBS service connected with the denomination's adopted safeguarding policy and procedures. The policy should clearly be clear regarding the blemished disclosure process and how decisions are made about suitability for work with children and/or adults at risk, including where an Enhanced

DBS (with/or without barred list) is required by law. This process might also include a risk assessment (see Section 6).

If there is any doubt regarding eligibility for DBS checks, advice should be sought from the denominational safeguarding team or from DBS outreach service. Contact details can be found here: [The DBS Regional Outreach service - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

5. Safeguarding Training

Each denomination provides safeguarding training for Clergy, Lay workers and volunteers. In an LEP, it's Clergy, Lay workers, employees and volunteers must attend the safeguarding training in accordance with the adopted policy. Records of training completed should be held by the LEP, and be available to their own denominations relevant body. Some denominations may additionally require their ministers to undertake their own denominational safeguarding training unless a reciprocal agreement is in existence.

6. Risk Assessment

When the need for safeguarding risk assessments arise, an LEP will follow the risk assessment process set out in the adopted policy and procedures and consult with the relevant denominational safeguarding team. This also includes occasions where a safeguarding contract is necessary.

In some denominations, the final decision on a risk assessment is made by the church safeguarding officer, in others the regional, diocesan, national or connexional safeguarding officer makes the final decision. Denominations may have different risk assessment levels and processes for church roles.

Where there is a lawful basis to do so, it may be necessary for the safeguarding officers in each denomination to share information pertinent to risk management.⁵ For instance, details of any mitigating factors relating to blemished DBS disclosures or any other concern that does not reach the threshold for a criminal conviction but may indicate a risk to an individual attending the church or to the reputation of the wider Church.

7. Risk Management

7.1 Safeguarding contract/agreement including breach of contract

The adopted safeguarding policy⁶ must be followed in managing those who present a risk in church congregations. Where an individual who is currently subject to a safeguarding contract or agreement states their intention to move to another LEP or church, there is an expectation that the safeguarding officer who holds details of the contract will communicate this (including sharing a copy of the contract or agreement) with their relevant counterpart in the receiving LEP or church, whether or not it is of the same or a different denomination.

7.2 Ordained Ministers and Local Preachers (where discipline measures apply)

It is the responsibility of the licensing/ordaining/accrediting denomination to oversee the disciplinary process relating to ordained ministers. Risk assessments should therefore be

⁵ The Privacy Notice relating to the adopted policy is the one which should be used in these circumstances.

⁶ Which for the avoidance of doubt includes use of the Privacy Notice and responsibility for Subject Access Requests and data breaches.

undertaken by their own denomination who retain the ability to suspend and/or instigate disciplinary proceedings.

Safeguarding officers must take early action to ensure that any safeguarding process involving allegations against an ordained minister from another denomination includes clear communication of the minister's details, the nature of the allegation, and any investigative work undertaken, including the involvement of any statutory authorities. Close communication should be maintained between denominations. Subject to legal requirements, it is generally not appropriate to withhold information from a safeguarding colleague in another denominational team that might impact or impede their own disciplinary processes, or which might mean that they are unable to take the necessary steps to act in relation to a minister they accredit, or have ordained or licensed. If there is any doubt as to whether data can be shared, advice must be sought from the relevant data protection professional.

Collaborative working between denominational safeguarding teams is critical where safeguarding allegations relate to the behaviour or conduct of an ordained minister of the LEP. Each denomination has its own clearly defined procedures for dealing with the investigation of concerns raised about ordained or accredited ministers, which may vary between denominations. Therefore, those investigating or supporting an LEP to investigate a safeguarding concern will need to work within the LEPs own safeguarding policy and also to the relevant ministerial disciplinary rules, which may comprise legal processes established by a different denomination.

In practice, this means that in any case where there is an allegation or complaint in relation to an ordained minister working in an LEP who is accredited and/or ordained by another denomination, that denominations' safeguarding officer must be informed and, communication must continue through the investigation and risk assessment process. The requirements of the policies and procedures (including disciplinary procedures) of the denomination to which the minister is a member, must be followed. Likewise, regular contact between the participating denominations should be maintained until the conclusion of any proceedings.

Data protection and information-sharing agreements need to make clear reference to the necessity and lawful basis on which to share information between denominations in such situations (see point 8). If there is any doubt as to whether data can be shared, advice must be sought from the relevant data protection professional.

7.3 Church Officers

Safeguarding concerns and allegations that relate to role holders who are non-ordained ministers should be dealt with using the processes set out in the LEPs adopted safeguarding policy and procedures. HR disciplinary processes should be consulted where an employment contract is in place and employment law applies. The same communication principles listed above should be applied.

8. Data Protection and information sharing

Information sharing is crucial in managing risk. Each denomination's Safeguarding Privacy Notice must include specific reference to the legal basis and requirement to share information in relation to safeguarding allegations, investigations and outcomes. The Privacy Notice must be shared and understood with and by LEP colleagues.

9. Inter-denominational co-operation

The major Christian denominations employ professionally qualified and experienced safeguarding staff in their district, diocesan, regional, national and connexional safeguarding teams. Safeguarding officers will recognise their peers and adopt an approach that reflects professional courtesy and respect to joint working in order to achieve the best outcomes for LEPs.

To that end, each denomination will provide an outline of its core safeguarding policies and procedures, its data protection policies and procedures and the structure of its safeguarding teams, alongside current contact details for relevant safeguarding staff. This contact list will be updated on an annual basis.

Each regional, district, diocesan or national safeguarding officer must make contact with their peers and look for opportunities to meet and at a minimum, make initial contact so that future contact and collaborative working is made easier.

10. Media response

In cases that might attract media attention, all communications teams of relevant denominations involved in the LEP will be informed and work together to agree a joint press statement. The lead role will be taken by the denomination whose policy has been adopted by the LEP. The exception is where ministers are involved, in which case the licencing/ordaining/accrediting denomination's communications team will take the lead and will keep partners informed.

11. Employment and governance of paid roles and volunteers within the LEP

The policy adopted by the LEP will be followed in these cases, including safer recruitment practices where required.

In all cases when LEPs are formed from previously single denomination congregations, consideration needs to be given to processes that need to be changed from one denomination to another. Legal and HR advice should be sought to support this particularly in relation to employment terms and conditions.