

SAFEGUARDING POLICY

1. Policy Statement

- 1.1. GCE believes that every person has the right to live a life free from abuse and free from the fear of abuse. In particular, we recognise the welfare of all children and vulnerable adults as being of paramount importance to the organisation regardless of gender, ethnicity, disability, sexuality or beliefs.
- 1.2. Recognising that children and vulnerable adults are at particular risk of abuse, this policy sets out our approach to safeguarding children and vulnerable adults from abuse. Our primary aim is to prevent abuse where possible but, if the preventative strategy fails, we will ensure procedures are used to deal effectively with incidents of abuse.
- 1.3. We will operate within the framework of the South West Safeguarding and Child Protection Procedures as determined by the South West Safeguarding and Child Protection Group (SWSCPG - <http://www.online-procedures.co.uk/swcpp/>), the Devon Safeguarding Adults Board (DSAB - <https://new.devon.gov.uk/devonsafeguardingadultsboard>) and the Devon Safeguarding Children Board (DSCB - <http://www.devonsafeguardingchildren.org>).
- 1.4. This policy together with related procedures are based on the above websites, the Home Office/Department of Health document “No Secrets”, and “Safeguarding Adults: A Multi-Agency Policy for the Protection of Vulnerable Adults from Abuse (rev. 2010)” jointly published by Devon County Council, Devon and Cornwall Constabulary and NHS Devon and the guidelines published by thirtyone:eight.
- 1.5. Our Safeguarding Policy and Procedures will comply with all relevant legislation and regulation, in particular the Safeguarding Vulnerable Groups Act 2006 (SVGA) as amended by the Protection of Freedoms Act 2012 (POFA), the Mental Capacity Act 2005, and the Rehabilitation of Offenders Act 1974 (ROA) as amended.
- 1.6. Our staff, Board and volunteer recruitment procedures shall comply with safer recruitment best practice to minimise the risk of inappropriate individuals being appointed to positions where they may have opportunity to exploit children or vulnerable adults.
- 1.7. The aim of this policy statement is to set out guiding principles regarding safeguarding of children and vulnerable adults that apply to every part of GCE.
- 1.8. Day-to-day implementation of this policy shall be by means of Guidance Notes drawn up by the Safeguarding Officer(s), which shall be made available to all relevant persons.

2. Scope

- 2.1. This policy applies to all employees, trustees, volunteers or any other person working on behalf of Grace Church Exeter, whether paid or unpaid.

3. Definitions

- 3.1. For the purposes of this policy, the following definitions apply:
- 3.2. “**Child**” or “**Children**” refers to any person aged under 18 years of age.
- 3.3. “**Vulnerable Adult**” refers to a person over the age of 18 who may be considered vulnerable. There is however now no longer any legal definition of “vulnerable adult”. For the

purposes of this Policy we will use the term “vulnerable adult” to mean an adult “who is or may be in need of community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”¹.

- 3.4. **“Regulated Activity”** with regard to **children** is defined by PVGA as amended by POFA, and includes teaching, training, instructing, caring for or supervising children, or providing advice/ guidance to children on their physical, emotional or educational well-being. Therefore, most GCE positions which work with under 18s will engage in Regulated Activity. The full definition is complex – refer to the DBS website.
- 3.5. **“Regulated Activity”** with regard to **adults** is defined by PVGA as amended by POFA, and now has a much narrower definition than prior to POFA. No current GCE work with adults is deemed Regulated Activity, although some service users may be in receipt of regulated activity by others (e.g. healthcare, social care, etc.). For definition of Regulated Activity with adults, refer to DBS guidance.
- 3.6. **“Safeguarding Officer”** refers to the individual with overall responsibility for overseeing all matters related to safeguarding (see below).
- 3.7. **“Staff”** refers to both paid employees and volunteers.
- 3.8. **“Board”** refers to appointed Trustees of Grace Church Exeter.
- 3.9. **“Disclosure and Barring Service” (DBS)** refers to the service formed by the merger of the Criminal Records Bureau and the Independent Safeguarding Authority.
- 3.10. **“Safeguarding Incident”** refers to any occurrence, or alleged/suspected occurrence that may be significantly detrimental to a child or vulnerable adult. It may be one-off, or a series or pattern of events. It may involve abuse (see below), or may be where there is significant risk of harm without third party involvement, such as self-harm or suicidal thoughts/acts (although often these are related to abuse).
- 3.11. **“Safeguarding Disclosure”** refers to when concern is raised about the possible abuse of a child or vulnerable adult. This may take the form of a victim reporting someone has abused them, a person reporting the abuse of a third party, or someone (staff or another person) reporting they are concerned that a child or vulnerable adult may be being abused even though no abuse has been witnessed or alleged. All safeguarding disclosures must be treated seriously.

4. Definitions of Abuse

- 4.1. Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or children.
- 4.2. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

¹ Definition from Home Office/Department of Health publication, “No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse”.

- 4.3. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.
- 4.4. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as 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 cyber bullying), 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.
- 4.5. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- 4.6. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
 - protect a child from physical and emotional harm or danger;
 - ensure adequate supervision (including the use of inadequate care-givers); or
 - ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- 4.7. Signs and Symptoms of Abuse

5. Signs & Symptoms of Abuse

- 5.1. The following signs could be indicators that abuse has taken place but should be considered in context of the child's whole life.

Physical

- Injuries not consistent with the explanation given for them
- Injuries that occur in places not normally exposed to falls, rough games, etc
- Injuries that have not received medical attention

- Reluctance to change for, or participate in, games or swimming
- Repeated urinary infections or unexplained tummy pains
- Bruises on babies, bites, burns, fractures etc which do not have an accidental explanation*
- Cuts/scratches/substance abuse*

Sexual

- Any allegations made concerning sexual abuse
- Excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour
- Age-inappropriate sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders - anorexia, bulimia*

Emotional

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging.
- Depression, aggression, extreme anxiety.
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/stealing/lying

Neglect

- Under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care, etc

*These indicate the possibility that a child or young person is self-harming.

6. Prevention of Abuse

- 6.1. GCE will take all reasonable measures to prevent abuse of children and vulnerable adults from occurring in the first place. Measures to be taken will include:
- Full use of “Safer Recruitment” practices to minimise the risk of unsuitable individuals being appointed to positions where they may be able to abuse children or vulnerable adults (see Section 5 below).
 - All staff, Board members and volunteers to receive safeguarding training appropriate to their role in accordance with recommendations of DSCB and DSAB, both during induction as part of rolling refresher training programme.
 - Where there is significant risk that church members or attendees may present a risk to others, risk assessments will be carried out to (a) identify individuals who may pose a risk to others, and (b) identify individuals who may be particularly vulnerable to abuse.
 - Constant vigilance by staff to identify behaviours that may lead to abuse, for example unusual “friendships” that may in fact be the grooming of vulnerable individuals by potential abuser(s).

7. Safer Recruitment

- 7.1. Recruitment of staff, volunteers and Board must be carried out in accordance with best practice in safer recruitment as set out by the SWSCPG website and relevant legislation and regulation. The recruitment process will include safeguards at every stage of the application process including advertising, shortlisting, references, interviews and DBS checks for relevant positions. This procedure is set out in our Safer Recruitment Policy & Procedures.
- 7.2. DBS checks will be carried out every 3 years on all workers.
- 7.3. It is an offence for someone who is barred from working with children or vulnerable adults to seek to carry out Regulated Activity. GCE will refer any barred person who applies for a post involving Regulated Activity to the DBS. Similarly, it is an offence to knowingly employ a barred person to engage in Regulated Activity, and under no circumstances shall GCE employ a barred person to such a position.

8. Pastoral Care

Supporting those affected by abuse. The Senior Leadership Team is committed to offering pastoral care within the church where appropriate. In some situations this might involve referring to outside agencies.

9. Responsibilities

9.1. General Responsibilities

9.1.1. Safeguarding is the responsibility of everyone in the organisation.

9.1.2. All concerns or allegations regarding the safeguarding of Children or Vulnerable Adults must be treated with the utmost seriousness. It is important to note that, whilst the vast majority of work carried out with vulnerable adults (as defined by SVGA prior to POFA) is now not considered Relevant Activity under POFA, almost all abuse of adults constitutes a criminal offence and must be dealt with accordingly.

9.1.3. All staff (including volunteers) must comply fully with this Policy. It is the responsibility of each individual to ensure that he/she has read and understood this Policy and the

Procedures, if for any reason he/she is unclear of his/her responsibilities with regard to safeguarding, he/she must seek clarification.

9.2. Safeguarding Officer

9.2.1. GCE take the responsibility of safeguarding with the utmost importance. The Safeguarding Officer has overall responsibility for all matters related to safeguarding of children and vulnerable adults. Phil Annetts is the Safeguarding Officer. These responsibilities include:

- Ensuring that Safeguarding Policies and Procedures are reviewed regularly as specified below, and that they are fully compliant with relevant legislation, regulation and any specific contractual obligations.
- Ensuring that Staff, Trustee and Volunteer Recruitment Policies and Procedures are in accordance with safer recruitment best practice.
- Ensuring that concise and clear Safeguarding Procedures are in place, and that all staff and volunteers are given sufficient induction and ongoing training to ensure they fully understand these procedures, including how to identify possible abuse.
- Advising how to handle specific safeguarding incidents and disclosures, including a clear system of how to report concerns as soon as abuse is identified or suspected.
- Keeping a log of all safeguarding incidents and disclosures, together with all relevant reports.
- Setting safeguarding training requirements, and keeping a log of such training and when refresher training is due.
- Reporting to the Trustees on an annual basis the number of incidents and disclosures, their essential nature, any identified trends, and steps taken to address any shortcoming in operational procedures.

9.3. Safeguarding Coordinators

9.3.1. The safeguarding coordinators look after the day to day implementation of the safeguarding policy and procedures. They are Anna Giles, Susy Holding & Gareth Sorsby and they hold responsibility for:

- Ensuring that staff and volunteer recruitment is carried out in accordance with safer recruitment best practice and relevant Policies and Procedures.
- Ensuring that all staff in their department understand and fully comply with all Safeguarding Policy and Procedures and have completed the safeguarding training as specified by the Safeguarding Officer.
- Put procedures and working practices in place that minimise the risk of abuse, including abuse by staff or volunteers. Procedures and working practices should also seek to minimise the risk of false allegations of abuse.
- Ensuring that staff and volunteers are able to identify signs of abuse, and fully understand their responsibilities should they become aware of a safeguarding concern.
- Ensuring that the initial response to any safeguarding incident or disclosure is appropriate and in accordance with Safeguarding Procedures.
- Ensuring that any safeguarding concern is properly recorded and reported to the Safeguarding Officer within the timescale prescribed in the Safeguarding Procedures.
- Ensuring that any safeguarding concern is dealt with appropriately and in a timely manner in accordance with the Safeguarding Procedures in consultation with the Safeguarding Officer.
- Ensuring that the Safeguarding Officer is kept fully informed regarding the process of dealing with a safeguarding incident or disclosure.
- Ensuring that a final report and all relevant paperwork are passed to the Safeguarding Officer for final signing off once a safeguarding incident or disclosure has been satisfactorily dealt with.

9.4. All GCE staff and volunteers

9.4.1. All Staff (including volunteers) are responsible for:

- Reporting any safeguarding incident or disclosure to the appropriate person(s) in a timely manner, in accordance with Safeguarding Procedures.

10. E Policy

When communicating with children using email, text messaging, or other means of electronic communication, great caution should be exercised. Whenever possible messages should be of a 'public' nature. It is important to use clear and unambiguous language to reduce the risk of misinterpretation. Inappropriate terms such as 'love' should not be used to sign off messages.

It might be that social media networks such as Facebook are useful for organising group activities. Again, any messages should be kept public, and workers should be diligent and appropriate in their communication.

Any text messages, emails or private messages that raise concerns should be passed on/shown to the Group Leader or Safeguarding Coordinators.

Where there has not been documents permission gained from parents, photographs or videos of children should not be taken.

11. Other Relevant Policies, Procedures and Guidance

11.1. For the sake of clarity, this Policy document has been kept concise. This section outlines other relevant Policies, Procedures and Guidance relevant to safeguarding children and vulnerable adults. IT IS THE RESPONSIBILITY OF ALL STAFF TO BE FAMILIAR WITH THE CONTENT OF ALL THESE DOCUMENTS.

11.2. **Safeguarding Procedures** – These are operational procedures giving clear and detailed instruction on matters related to safeguarding, including the action to be taken if a staff member becomes aware that a child or vulnerable adult may be being abused in some way, or otherwise at risk.

11.3. **Appointments Policy and Procedures** – these explain how GCE appoints new staff, trustees and volunteers and includes safer recruitment procedures.

11.4. **Whistleblowing Policy and Procedures** – these explain what you can do if you have no trust in GCE to deal effectively with safeguarding or other serious matters, including if you think they may be directly implicated.

12. Review

12.1. This Policy shall be reviewed at least once every three years

12.2. Safeguarding Procedures shall be reviewed at least once every three years by the Safeguarding Officer(s).

12.3. Reviews shall also be carried out in the event of a change in legislation, regulation or if shortcomings are identified through ongoing monitoring (including following a safeguarding incident or disclosure).

This policy was reviewed by the trustees on

Signed on behalf of the Trustees by the Chair:

Signature: _____ Date: _____