



PROCEDURES

Administrative routines and other directives that must be followed.
These procedures are consistent with
The House of Bishops' Policy
“Protecting all God’s Children 2004”

Introduction

G1. Parochial Church Council responsibilities¹

In law the incumbent and PCC are the responsible body in respect of church activities that are carried out under their auspices or control, and have a duty of care towards their children and young people. This means that the incumbent and PCC must follow the procedures set out in this Diocesan document and also do their best to follow the practice recommendations. In team ministries the practical implementation of the policy is often undertaken by a District Church Council. Each Church Council must provide an implementation document setting down how it will administer the procedures and what guidelines of good practice it will follow. See G3 for help with implementation.

Any changes to the recommended practice must be discussed and agreed with the Diocesan Safeguarding Adviser.

The PCC must review both its policy statement and its implementation document every year. The Parish Child Protection Co-ordinator should conduct the review and present a report at the Annual Parochial Church Meeting. The Child Protection policy and its implementation document should be presented to the new PCC as soon as possible after the APCM so that new members of the Church Council can become aware of their responsibilities. The parish's commitment to the policy should be renewed by completing a new "Parish Child Protection Policy Statement" (see Appendix I). This should be posted on the church notice board and a copy sent to the Diocesan Safeguarding Adviser.

The PCC needs to delegate its responsibilities for the management of specific cases to the incumbent and Parish Child Protection Co-ordinator so that the highest level of confidentiality can be maintained at all times.

G2. Parish Child Protection Co-ordinator

- Each Parochial Church Council and incumbent must appoint a Parish Child Protection Co-ordinator to be responsible under them for implementing the House of Bishops' policy and the Diocesan requirements in the parish
- The Parish Child Protection Co-ordinator should work closely with the incumbent and if possible be co-opted on to the PCC. He or she should make a report to the PCC at least once a year
- This role can be divided between different people if that is more practical. Each person should be clear about his or her responsibilities
- This role should be ideally undertaken by a layperson with special skills or experience of working with children – a parent, a grandparent, a foster carer, teacher, nursery worker,

¹ See B1 for more detailed information on the responsibilities of various bodies from "Protecting all God's Children"



youth worker, or anyone who cares about standards of childcare within their parish community. The Co-ordinator will be someone of integrity; they will be respected in their parishes and will be able to maintain appropriate confidentiality. Ideally the Co-ordinator should be someone who is not already an office holder or responsible for children or youth work in the parish so that independence is maintained.

The co-ordinator should attend training provided by the Diocesan Safeguarding Adviser at least every three years.

The Co-ordinator will be responsible for:

- Possessing a copy of “Protecting all God’s Children 2004” as well as this document and being familiar with their contents
- Implementing the Policy, procedures and practice guidelines
- Making any extra recommendations required for the particular circumstances of a parish or its premises and having those agreed by the Parochial Church Council
- Receiving, with the incumbent, any concerns about children or adults in the parish and making sure that proper advice is sought from the Diocesan Safeguarding Adviser and appropriate referrals made. Concerns regarding clergy should be passed to the relevant archdeacon and the Bishop informed of the general circumstances. This is so that the procedures in the Clergy Discipline Measure can be followed. The Archdeacon may be required to make a formal complaint under the measure
- Overseeing and if necessary administering the process for new appointments, sending out Confidential Declaration forms and reference letters and making sure any further vetting checks are made using the CRB disclosure process
- Being a member of the interviewing panel for any new appointments to represent child protection interests
- Being the link person between the Diocesan Safeguarding Adviser (DSA) and the parish.

The Co-ordinator may also be responsible for:

- Being the named independent person (advocate) that children are encouraged to talk to. If this is not the Co-ordinator another person or persons should be appointed for this task
- Supporting the children's and young people's workers through regular meetings
- Providing or arranging the provision of training in child protection matters for all those involved with children or young people.

G3. Implementing or reviewing the Diocesan policy, procedures and practice guidance in the parish

- The Child Protection Co-ordinator, perhaps with a small group, should review the parish child protection arrangements each year before the Annual Parochial Church Meeting. A report should be provided for the meeting and the policy ratified as soon as possible by the new PCC. A sample report form is included

- Bring the House of Bishops' policy, the Diocesan procedures and recommended good practice together with the Parish implementation document to the PCC for ratification. The incumbent and churchwardens should sign the Parish Policy Statement and agree a date to review the policy on an annual basis
- One copy of the Policy Statement to be placed on the church notice board, one copy to be sent to the Diocesan Safeguarding Adviser for compliance records
- If there have been areas of concern in the parish about aspects of the children and youth work use the opportunity of implementing the Child Protection Policy to make changes
- The Diocesan Safeguarding Adviser will be able to give advice or answer questions on any aspect of implementing the Diocesan Child Protection Policy
- The implementation of the House of Bishops' Policy and the Diocesan requirements in parishes will be monitored by the diocese every three years.

G4. Training requirements

- All clergy joining the Diocese must attend a diocesan child protection seminar
- They should attend a refresher training every three years
- All Readers must attend a training seminar after each appointment
- All Parish Child Protection Co-ordinators must attend a diocesan child protection seminar on appointment and a refresher training every three years
- All paid children and youth workers must attend a Diocesan child protection training seminar on appointment and a refresher training every three years
- All other people working with children and young people must attend training every five years. This can be arranged through the parish or by the Diocesan Safeguarding Adviser
- Refresher training can be a repeat of the initial seminar or other specialist training or relevant conferences. A record should be kept of all training undertaken.

Procedures for the safe recruitment of paid employees and volunteers - including disclosure from the CRB and vetting by the ISA (after autumn 2009)

Guidance from the Criminal Records Bureau and the Independent Safeguarding Authority tells us to treat all volunteers as if they were employees for the purpose of recruitment.

G5. Diocesan appointments

The appointment of clergy, readers and laypeople holding the Bishop's licence will be administered by either the Bishops' Offices or the Diocesan Office and are not the responsibility of the parish. Guidance on safe recruiting for these posts is held in these offices.

G6. General information

- The PCC should agree, as part of the child protection implementation document, how new employees and volunteers will be recruited and appointed, and who will be involved in the process. It should be agreed who will be responsible for taking up references,



seeking a confidential declaration and checking the identity of applicants for CRB disclosures. These tasks can be completed by different people

- Leaders of groups should inform the person managing recruitment of new employees or volunteers at an early stage so that these procedures are followed. New staff and volunteers must complete the recruitment process before starting work. A progress chart is supplied
- It is advised that normally people should be part of the parish for at least 6 months before being asked to help with work with children, young people or vulnerable adults
- People who help in groups less than once a month should be treated as “visitors”. They should be supported and supervised by an officially appointed helper
- Young people between 14-18 may help with groups but should be supervised and supported by an adult helper who will be responsible for ensuring that good practice and the child protection procedures are followed
- People such as vergers, caretakers and mini-bus drivers may have regular contact with children and need to be part of these procedures.

G7. Making an appointment

- For any position, decide on a job description, which will include a statement of the tasks and responsibilities and to whom the person will be accountable. A sample document is supplied
- Decide whether or not any new appointment requires a disclosure from the CRB. For disclosures at the standard or enhanced level there must be an expectation that the role will include regular contact with children or vulnerable adults, see the introduction to the CRB
- Ask applicants to fill in the Parish application form (see Appendix 4) which includes information about the policies required by the CRB. These policies should be made available to the applicant on request
- Seek two references including at least one that can comment on a person’s suitability to work with children or vulnerable adults. If possible, ensure that one reference is from outside the present congregation. Obtain a further reference from the incumbent of any previous church. A pro-forma letter is provided
- Ask each applicant to complete a confidential declaration form. This gives them the opportunity to declare any convictions or allegations at an early stage. It should be made clear to the applicant to whom the form should be returned and who will see any confidential information it contains. Information contained on a declaration should be discussed with the Diocesan Safeguarding Adviser. The manager of the recruitment procedure should be informed when a satisfactory confidential declaration has been obtained.
- Interview the candidates. For volunteers the interview can be informal and conducted in a relaxed and inclusive manner. Nevertheless it should be focussed and cover the following areas:
 - a) Relevant knowledge and experience

- b) Attitude and aptitude
- c) Sensitivity and behaviour towards others
- d) Awareness and understanding of safeguards in working with children and young people.
- Complete the CRB and ISA process – see separate guidance.²
- It is the responsibility of the parish to seek evidence of criminal background for those people who have lived outside the UK. The CRB administrator, Diocesan House (01273 421021) may be able to give advice. If an equivalent certificate to CRB is not available references should be sought to cover the period spent abroad after the age of 18.
- It is important that once all the checks have been completed and the person has been appointed that follow up action is taken:
 - New volunteers are made aware and asked to adhere to the Diocesan Child Protection policy and procedures, best practice guidelines and codes of conduct.
 - Training needs are established and actioned
 - The roles and responsibilities of the new volunteer are signed up to – A sample job role/description is included
 - A period of supervision/observation or mentoring is used to support the new volunteer.

Procedure for responding to concerns about possible abuse

G8. Introduction

As Christians, we are called to recognise the unique status and infinite worth of each human being. The Children Act 1989 emphasises the importance of children in society by introducing the principle that the welfare of the child is paramount. The Act states that it is the duty of the Local Authority:³

- To take reasonable steps to prevent children suffering ill treatment or neglect
- To share information about any child within the area who is likely to suffer harm
- To investigate where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm
- To safeguard and promote the welfare of children who are in need and their families by the provision of services.

It is the duty of every Christian to be vigilant about the care of children in the congregation. Those church members who have direct contact with children are more likely than most to become aware of potential problems. Such people are typically other parents, youth workers (including leaders of uniformed organisations), clergy, head servers, children's workers, music group leaders, choir directors and organists.

² Information about the Criminal Records Bureau can be found in B2. More detailed advice about applying for CRB disclosures is available from Diocesan Church House.

³ Children Act 1989 Section 47(1)



These particular roles do not however remove the responsibility of every member of the congregation. Anyone who is worried about the behaviour of another member of the congregation or the demeanour of a child has a duty to voice those concerns to the person designated to co-ordinate child protection in the parish or organisation or directly to the Diocesan Safeguarding Adviser.

If the concerns are about a prominent member of the congregation or someone in a position of leadership, this can lead to considerable anxiety, however doing nothing could result in continuing harm to the child or other children. It is important that anyone expressing concerns should be respected and his or her anxieties taken seriously.⁴ Anyone formally hearing a complaint should keep a careful record of all conversations and all decisions and actions taken. These records should be kept in a secure place and in accordance with data protection requirements.

Disclosures of Abuse

G9. Disclosures concerning non-church organisations

Clergy or lay-people may hear about concerns regarding their Church School or uniformed organisations. These concerns should be reported using the School's or the uniformed organisation's Child Protection procedures.

G10. Disclosures from a child or young person

As a church worker you may get to know your children and young people very well. They may trust you enough to be able to tell you about unhappy things that are happening – at home, at school, at church. This is both a privilege and a responsibility.

It is worth considering the following if you do find yourself in such a situation:

- Remember that the child may want the abuse to stop but still love the abuser
- The child may think that it is possible to stop the abuse without anything else happening
- If a child asks to talk in confidence **ALWAYS** tell them that that will depend on the circumstances. It will be necessary to get other people to help if they are being harmed
- If it is possible, try to have another adult present whilst the child speaks, but do not prevent the child from speaking.

When you are listening to a child:

- Listen positively to what the child says and take it seriously
- Accept what is being said (this is not the same as deciding whether the allegation is true or not – others will address this later)

⁴ See the whistle-blowing procedure G29
Diocese of Chichester 2009

- Avoid leading the child or young person and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said
- Be aware of interpreting what the child says, especially if they have learning or physical disabilities which affect their ability to communicate or English is not their first language
- Reassure the child that they were right to tell
- Do not promise complete confidentiality. Explain to the child or young person “I will only tell people whose job it is to keep children safe”
- Try to explain what will happen next in a way that the child can understand
- Make careful notes (the circumstances, what the child said, what you said etc) as soon as possible, preferably within an hour. Include dates and times of incident/recording and keep the notes safely
- Inform either the incumbent or the Child Protection Co-ordinator
- Check that an appropriate referral has been made
- Make sure support is in place for the child and seek support for yourself
- Make a record of what actions you have taken and keep in a secure place (if completing the form electronically, do not save copies to the hard drive or floppy disk. Print a copy, sign and date and then delete immediately. Pass the record to Children’s Services or the Police and to the Diocesan Safeguarding Adviser that day).

You must not:

- Speak directly to the person against whom allegations have been made
- Attempt to investigate the situation yourself.

If the child or young person needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concerns and ensure that they are aware that this is a child protection issue.

Sharing Concerns with Parents

Where there are concerns that the parent(s) may be responsible for or have knowledge of the abuse, sharing concerns with the parent(s) may place the child at further risk. In such cases advice must always firstly be sought from the Police or Children’s Services as to who informs the parents.

The child’s views should also be considered in deciding whether to inform the family in some circumstances, particularly where the child is sufficiently mature to make informed judgements about the issues, and about consenting to that.



For a further discussion about information sharing and confidentiality see section G15 .

G11. Disclosures of abuse from adults

Adults may speak of concerns about a child or the behaviour of an adult. These should be listened to carefully and responded to. The conversation should be recorded. The adult will need to know that if it is considered that a child is suffering significant harm the information will have to be passed on whether or not the adult wishes this to happen.

G12. Disclosures of historical abuse

In the course of their work many ministers and those offering pastoral support in the Church will find themselves hearing disclosures from adults of abuse that happened to them when they were children.

When such allegations are made, they should be responded to in the same way as contemporary concerns, in terms of prompt referral to Children's Services and discussion with the Police if it appears that a criminal offence has been committed.

If possible the person hearing the disclosure should establish if the adult is aware of the alleged perpetrator's recent or current whereabouts and contact with children.

The adult should be asked whether s/he wants a police investigation and must be reassured that the Police Child Protection Team is able and willing to undertake such work even for those adults who are vulnerable as a result of mental health or learning difficulties. Whether the Police become involved in an investigation will depend on a number of factors including the adult's wishes and the public interest.

The pastoral care of the person who has been abused should be a priority and reassurances given that, even without her/his direct involvement, all reasonable efforts will be made to look into what he/she has reported.

Remember as adults we are all responsible for trying to ensure the safety of children and young people. We should be alive to the possibility that people who have committed sexual abuse against someone years ago could well be abusing children today.

G13. Disclosure from an abuser

People who abuse children rarely admit to what they have done. It is however possible that admissions may be made to clergy and pastoral counsellors.

It is necessary to tell a person who admits an offence against a child or young person that such information cannot be kept confidential.



A priest must be clear about the status of such a conversation and make sure there is no misunderstanding about whether the seal of confession applies.

Further advice about information sharing and matters of confidentiality can be found in section G15 and in Appendix 3 of the House of Bishops' Policy document "Protecting all God's Children".

Be supportive but do not seek further details. A person who gives information which could incriminate themselves, should have access to legal advice.

Explain you have a duty to pass on the information to the Police and Children's Services for child protection purposes unless you judge that such a statement could place a child at risk of harm.

The motive for admitting what has happened may be a desire to address the problem and obtain help. The avenue which enables this to happen and protects children is the criminal justice system.

G14. Seeking advice after hearing a disclosure

It is not a church worker's (clergy, paid or unpaid worker) responsibility to decide if the abuse has or has not occurred; they must always discuss the concern with the appropriate person. Clergy should consult with the Diocesan Safeguarding Adviser; Church workers should inform their incumbent or their Parish Child Protection Co-ordinator.

If possible a course of action should be agreed between the incumbent and the co-ordinator.

In most cases any referral to the social care agencies will be made, if appropriate, by the co-ordinator but in exceptional circumstances this should not prevent any other person making a referral if they think it is necessary.

It can often be the case that there is uncertainty about whether the concerns are a matter of child protection or a family in need of support and services. In any cases of doubt the circumstances should be discussed with Children's Services who will decide which type of referral is required.

The Parish Child Protection Co-ordinator should discuss all concerns with the Diocesan Safeguarding Adviser. If the adviser is not available it is always possible to discuss the matter with Children's Services. If in doubt it is always better to make a referral to the statutory agency rather than do nothing.

G15. Sharing information – government guidance

Six key points on information sharing⁵ for all those working with children or those needing to make decisions about making a child protection referral:

- You should explain to children, young people and families at the onset, openly and honestly what and how information will, or could be shared and why, and seek their agreement. The exception to this is where to do so would put the child, young person or others at increased risk of significant harm or an adult at risk of serious harm, or if it would undermine the prevention, detection or prosecution of a serious crime⁶ including where seeking consent might lead to interference with any potential investigation
- You must always consider the safety and welfare of the child or young person when making decisions on whether to share information about them. Where there is a concern that the child may be suffering or is at risk of suffering significant harm, the child's safety and welfare must be the overriding consideration
- You should, where possible, respect the wishes of children, young people or families who do not consent to share information. You may still share information, if in your judgement on the facts of the case, there is sufficient need to override that lack of consent
- You should seek advice where you are in doubt, especially where your doubt relates to a concern about possible significant harm to a child or serious harm to others
- You should ensure that the information you share is accurate and up-to-date, necessary for the purpose for which you are sharing it, shared only with those people who need to see it, and shared securely
- You should always record the reasons for your decision – whether it is to share information or not.

G16. Making a referral

All disclosures or allegations where the alleged offender is part of the child's family must be referred to the appropriate assessment team of the Children's Services.

When the disclosure or allegation relates to a person working with children⁷ or in a position of trust in the Church the referral must be made to the Local Authority Designated Officer (LADO) who is responsible for managing allegations in these circumstances

When making the referral give the appropriate person as much detail as possible, describing the event or disclosure, as well as information about the child and family. Distinguish between fact and opinion, what is first hand knowledge and what has been heard from

⁵ From "Information Sharing: Practitioners' guide 2006. Non-statutory guidance from the Department of Education and Skills (now the DCSF), page 5

⁶ Serious crime for the purposes of this guidance means any crime which causes or is likely to cause significant harm to a child or young person or serious harm to an adult.

⁷ See G29 for the procedure on whistle-blowing



others. Agree who is to be told of the referral e.g. the parents and by whom they will be told. This will usually be the responsibility of the Children's Services. The referral should be followed up with a letter, a copy of which must be sent to the Diocesan Safeguarding Adviser.

If it is decided that the concerns refer to a child in need, agree how the family will be supported.

The person directly involved with a disclosure or observation should be prepared to:

- Have further discussions with the Children's Services and Police
- Give evidence in court if required to do so.

G17. Following a referral about a person in a position of trust

Once a concern has been identified that a child may have been harmed by a member of the Church community and a referral made to the statutory authorities, it is important to liaise closely with them during any investigation. This is always a difficult time and needs to be carefully managed. It is the responsibility of the Diocesan Safeguarding Adviser to co-ordinate the Diocesan response, attend strategy meetings with the other agencies and interested parties and work with them during the investigation. The incumbent, or the Archdeacon in the case of clergy referrals, will be responsible in consultation with the Diocesan Safeguarding Adviser for the co-ordination of support in the parish.

The highest degree of confidentiality should be maintained and only the people who need to know should be informed of the circumstances. The Diocesan Director for Communications should manage all media relations.

G18. The role of the senior strategy meeting

A multi-agency strategy meeting is convened in any cases where the investigation of the alleged abuse could be complex or the alleged offender occupies a position of trust. The alleged offender may work in a setting where a number of children from different families are at risk or more than one institution may be involved. The organisations involved will provide background information and be involved in the plan for the investigation. In Church cases the Diocesan Safeguarding Adviser and the Incumbent or Archdeacon are likely to attend. Advice on various topics will be provided including:

- Support for the alleged victim/s and alleged offender
- The possibility of suspension from normal duties
- An agreed response to any media interest.

At the end of any investigation the multi-agency strategy meeting will consider:

- Whether the alleged offender might be a continuing risk to children
- The provision of a report to be used in disciplinary proceedings
- Whether a referral needs to be made to lists of barred individuals or the Independent Safeguarding Authority (after Autumn 2009).

G19. Suspension

In all circumstances where an allegation is made relating to beneficed or licensed clergy, licensed, or accredited lay-workers, paid lay staff or volunteers, consideration must be given to whether a person should be suspended from their duties whilst the statutory agencies undertake any investigation. Suspension should be seen as a neutral act.⁸

Suspension allows for an individual to stand down or stand aside while matters of concern are considered. The suspension is primarily for the protection of children but the needs of the person themselves and their family should also be considered particularly in the light of media attention. In order to decide whether or not to suspend the person, the Bishop (or employer or manager) should seek legal advice and consult with the Diocesan Safeguarding Adviser who will have taken advice from the statutory agencies involved in the multi-agency strategy meeting. This advice will assist in determining whether it is possible and appropriate to suspend the person temporarily or ask them to take leave of absence or have their duties curtailed to prevent contact with children. Decisions should always err on the side of caution. Any information provided to the individual regarding the reasons for suspension must not prejudice any subsequent investigation. A person should always be suspended if he or she is charged with a criminal offence against a child or young person.

G20. Pastoral support

During the investigation the child or young person and their family will need support. Another person will need to support the alleged offender. People involved in support should be uninvolved with the investigation or disciplinary proceedings and may be chosen from outside the diocese to ensure neutrality. The Police advise that it is important that these parties should not communicate with each other about the allegation so that evidence is not contaminated. In the case of allegations against a priest the Archdeacon will need to manage the impact of the investigation on the parish.

G21. Communications with the media

In the event of an incident all communications both within and outside the Diocese must be handled by the Diocesan Director for Communications who will consult with the Bishop and the relevant Archdeacon, the parish and the Diocesan Safeguarding Adviser. Particular care should be given regarding any public statements or public prayer, which should be agreed with the Bishop. Statements for possible media use will normally be agreed at a multi-agency strategy meeting.

G22. Insurance advice

The PCC should make sure that they have adequate insurance, including Public Liability Insurance to cover all their activities both on and off site. The Council should also make

⁸ The term “suspension” is also used in matters regarding clergy discipline for a penalty imposed after a finding of misconduct.



sure that the policy includes Legal Protection Insurance to cover legal costs resulting from allegations made against its employees or volunteers.

The Ecclesiastical Insurance Group has issued a document on child protection which states - "Ecclesiastical considers that the implementation of the House of Bishops' Policy document by all church organisations is essential for the maintenance of liability insurance in relation to the issues it addresses". The insurance company also expects that good practice as laid down by the Diocese will be followed as closely as possible.

The Church's insurance company must be notified of any allegations of abuse which are likely to affect the insurance held by the parish. They should be notified once a referral has been accepted by the Children's Services. A copy of such notification should be sent to both the Archdeacon and the Diocesan Safeguarding Adviser. Advice should be sought about the insurance position and any steps needed to be taken to safeguard it. The Claims Manager will also need to be kept in touch with developments. This notification should be directed to:

The Managing Director
Ecclesiastical Insurance Group
Beaufort House
Brunswick Road
Gloucester GL1 1JZ

It should be marked Strictly Private and Confidential. Failure to notify the insurers could prejudice the cover under the insurance policy.

Parishes insured by other companies should follow a similar procedure.

Any person accused of abuse where they have the benefit of insurance should also inform their insurance company.



G23. Checklist for those making referrals

	Action	Notes
Information gathered and checked for accuracy		
Incumbent and CP Co-ordinator agreed on action		
Diocesan Safeguarding Adviser consulted		
Referral made by either parish or Diocesan Safeguarding Adviser		
People in the parish who are aware of the referral		
Suspension from duties considered		
Media interest prepared for		
Support for all concerned in place		
If referral accepted – insurers notified		

G24. Following an investigation

Occasionally, an untrue allegation may be made. It is important not to make judgements and to allow any allegation to be carefully investigated to try to ascertain the truth. Untrue allegations can be the result of some other concern or unhappiness in a child's life. It is very important that clergy or people working with children do not put themselves in vulnerable situations.

An investigation may result in various actions. It may be shown that the person has no case to answer or they may be charged with an offence and the Crown Prosecution Service asked to consider prosecution. The person may concur with the truth of the allegation and accept a Police caution or plead guilty in court. In order for the CPS to sanction a prosecution they have to believe that there is more than a 50% chance of gaining a conviction and also that it is in the public interest to prosecute.

The multi-agency strategy meeting overseeing the investigation should be asked to provide a report which can be used in any subsequent disciplinary proceedings, for other decision making or for future reference. The report, which should be agreed with their legal advisers, should include any statements which parties have agreed can be used for this purpose, a factual account of the investigation and an assessment of any continuing risk. It is helpful if the Diocesan Safeguarding Adviser can agree the terms of the report at the beginning of the investigation.

G25. Situations where there is no conviction

There are many reasons why a particular case may not come to court, but this does not necessarily mean there is no remaining concern. Even following an acquittal there may remain evidence of inappropriate or misguided behaviour that needs to be addressed. The advice of the multi-agency strategy meeting should be sought about any continuing risk to children. It may still be appropriate in some circumstances and in accordance with legal advice to continue disciplinary action.

If there remains unresolved matters of concern, either untested complaints of serious harm to a child or evidence of inappropriate behaviour by the adult, a professional risk assessment⁹ should be carried out to try to ascertain whether it is safe for the person to continue work which brings them into contact with children. Depending on the outcome of the assessment it may be necessary to introduce a regime of training and supervision or to re-deploy the person in another post.

Advice should be sought from the multi-agency strategy meeting about whether information should be passed to the Department for Children, Schools and Families, so that they can decide whether the person should be placed on the Protection of Children Act List

⁹ For more advice regarding risk assessments contact the Diocesan Safeguarding Adviser.



(POCALs) and the person barred from working with children. After Autumn 2009 this decision will be made by the Independent Safeguarding Board. In the case of clergy, consideration should also be given about whether the person should be referred for inclusion on the Archbishops' list¹⁰.

G26. Re-deployment following a conviction or caution

Careful consideration should be given to the future employment or volunteering role of the person involved. They may be barred from working with children. Even if not barred it will only be in extremely exceptional circumstances, and following a professional risk assessment, that a person who has a conviction or caution for harming a child in a **non-sexual manner** should be allowed to work or be a volunteer where there is the opportunity for contact with children.

A person convicted or cautioned for any sexual offences against children should not again work with, or be a volunteer, where he or she could come into contact with children. This would include being an adult member of mixed-age activities. An agreement should be drawn up to define the relationship between the convicted person and the church community.¹¹

For people involved in pastoral or other authorised ministry, whether ordained or not, it may not be possible to provide the level of supervision required even if a particular post does not involve specific contact with children. People engaged in such a representational ministry are regarded as trustworthy and as people of integrity, and this perception can be (and has been) used by offenders to target victims. Rehabilitation to any kind of representational ministry should be approached with extreme caution, should follow a professional risk assessment and treatment programme and should be with the agreement of the local child protection agencies.

G27. Completing the process

At the end of an investigation, court case or disciplinary procedure, all those affected will need to be informed of the result and arrangements made, where appropriate, for continued support, counselling or treatment. Consideration should be given to the healing of the congregation and the support required for the person taking over the role that the offender held. The effects of child abuse can be felt for many years after the abuse itself has ended.

The Diocesan Safeguarding Group should meet and agree what lessons can be learned from the incident and ensure that any changes to procedures or good practice are implemented both at Diocesan and parish level.

¹⁰ See Clergy Discipline Measure 2003 Section 38 for details of the Archbishops' Caution List.

¹¹ See procedure for ministering to offenders G35



In serious cases or where someone makes a complaint about the process it may be appropriate for the Bishop to ask for an independent review of the situation. This could be undertaken by an independent social worker, a neighbouring Diocesan Safeguarding Adviser or the National Child Protection Adviser. Any recommendations regarding good practice should be disseminated nationally.

G28. Survivors of abuse

The church will be involved with survivors of abuse in many ways:

- Abused children may come to the Church for help
- Adult abuse survivors may turn to the Church for help
- Some clergy were sexually abused as children, and may need the support of colleagues, congregations and colleagues
- Children may be abused by Christian family members
- Children may be abused by clergy or church workers

Each parish should consider the fact that they almost certainly have survivors within their community and should think about ways of responding in a sympathetic and practical way. This means creating a loving environment within which healing can happen, and which may require providing access to factual information and sources of professional help. The Diocesan Safeguarding Adviser can help with access to counselling services if required.

Procedure for “whistle-blowing”

G29. Introduction

Every member of a congregation needs to acknowledge their individual responsibility to bring matters of concern to the attention of the incumbent, Parish Child Protection Co-ordinator, Diocesan Safeguarding Adviser or a relevant agency. Although this can be difficult this is particularly important where the welfare of children may be at risk.

A colleague may be the first to recognise that something is wrong but may not feel able to express concerns feeling that this would be disloyal; he or she may fear harassment or victimisation. These feelings, however natural, must never result in a child or young person continuing to be unnecessarily at risk. Remember it is often the most vulnerable children or young people who are targeted. They need someone to safeguard their welfare.

G30. Reasons for whistle-blowing

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour
- To prevent the problem worsening or widening
- To protect or reduce risks to others
- To prevent becoming implicated themselves.

G31. What stops people from whistle-blowing

- Starting a chain of events which spirals out of control
- Disrupting the work or project
- Fear of getting it wrong
- Fear of repercussions or damaging careers
- Fear of not being believed.

G32. How to raise a concern

- Concerns, suspicions or uneasiness should be voiced as soon as possible. The earlier a concern is expressed the easier and sooner action can be taken
- Try to pinpoint exactly what practice is concerning; what has been heard or what has been observed
- Approach the incumbent, Parish Child Protection Co-ordinator or the Diocesan Safeguarding Adviser
- If the concern is about a member of the clergy contact the Diocesan Safeguarding Adviser or the Archdeacon.
- Make sure a satisfactory response is made - don't let matters rest
- Ideally concerns should be put in writing, outlining the background and history. Dates and times should be provided if possible
- It is important to provide as many facts as possible and not rely on rumour or opinion. The whistle-blower is not expected to prove the truth of an allegation or investigate.

G33. What happens next

- The whistle-blower should be given information on the nature and progress of any enquiries
- The incumbent should make sure the whistle-blower is not harassed or victimised
- No action will be taken against a whistle-blower if the concern proves to be unfounded and was raised in good faith
- Malicious allegations may be considered very seriously and will be a disciplinary offence for those in employment.

G34. Self reporting

There may be occasions where a church worker has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Clergy and church workers have a responsibility to discuss such a situation with the person to whom they are accountable so that professional and personal support can be offered. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Further advice and support

It is recognised that whistle blowing can be difficult and stressful. Advice and support is available from the Diocesan Safeguarding Adviser.

"Absolutely without fail - challenge poor practice or performance. If you ignore or collude with poor practice it makes it harder to sound the alarm when things go wrong" (reproduced with acknowledgement to "Sounding the Alarm" – Barnardos).

Procedure for ministering to people who pose a risk to children

G35. Introduction

Research has indicated that a higher proportion of convicted offenders against children may be found in church congregations than in the population generally. It is therefore probable that many congregations will have people who have abused children amongst their worshippers, some of whom will be known. Not all will have committed sexual offences; some will have been guilty of neglect, physical or emotional abuse.

The Church's duty to minister to all imposes a particular responsibility to such people. This must not however compromise the safety of children. If a congregation is generally aware of how offenders will be treated it will be easier to deal confidentially with a specific case if it should occur.

As well as people with convictions against children there are others whose position in a congregation may need to be carefully and sensitively considered to decide whether they pose a risk to children. This would include people who are, or have been subject to investigation by the police for a criminal offence against a child or young person, people who have been convicted of violent or sexual offences against adults including domestic violence, people involved in drug or alcohol addiction, adults with a mental disorder or special needs, which might in rare cases result in erratic behaviour.

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

G36. Ministering to people who pose a risk to children

When it is known that a member of the congregation poses a risk to children or young people the Diocesan Safeguarding Adviser must be consulted, so that a safe way of managing their behaviour can be agreed in conjunction with the relevant statutory agencies.



Please do not take any action in advance of consulting the Diocesan Safeguarding Adviser as every situation is different and there may be other legal implications.

- If the person's victim attends the church the offender should be introduced to another congregation. Consideration must also be given to other people who have been abused in the past
- The person should not be offered or accept any official role or office in the church which gives them status or authority as a child or young person may deem that person to be trustworthy
- A formal, recorded discussion should be held with the person, explaining that a small group from the congregation will need to know the facts in order to create a safe environment for him or her. If possible the membership of the group should be agreed. Those needing to know are likely to include the clergy, churchwardens, Child Protection Co-ordinator and any befriending volunteers. Any children's work co-ordinator will need to be informed so that they do not inadvertently ask the person to volunteer
- It must be made clear that no one else will be informed of the facts without the person's knowledge and the agreement of the public protection authorities. The highest levels of confidentiality should be maintained.

If the person is to be integrated or remain in the church community it will be necessary to establish clear boundaries for both the protection of the children and to lessen the possibility of the adult being wrongly accused of abuse. The Diocesan Safeguarding Adviser will prepare an agreement, which considers:

- What risk this poses to children and other vulnerable people in church and how this should be managed
- What other pastoral concerns this presents and how these might be managed
- How the parish can best respond in order to reinforce any effort the offender may be making not to repeat their behaviour
- The level of involvement in church activities that is considered safe and acceptable and what steps will be taken to monitor this
- In the event of the agreement not being adhered to, those involved to meet and agree on what steps need to be taken.

The offender should be asked to sign the agreement. The agreement should be enforced, and no manipulation allowed. If there are problems with this, seek the advice of the Diocesan Safeguarding Adviser.

The agreement should be reviewed at regular intervals with the Diocesan Safeguarding Adviser. An agreement must remain in place so long as the person is a part of the congregation, whether or not their name appears on the Sex Offenders Register.



In some cases offences only come to light after many years. In such situations great sensitivity will be required. It must however be remembered that there may still be a substantial risk to children.

G37. Circles of support and accountability

This is the name for a system of structured befriending and supervision for sex offenders, usually at the point of release from prison. Many of the volunteers involved in the circles are recruited from churches although the offenders are not necessarily Christian. If a known sex offender who attends a church is also part of a “Circle of Support” they will have a specific contract with the circle as well as any parish arrangements agreed with the Diocesan Safeguarding Adviser.

G38. Procedure for outside groups using church premises

Every PCC must decide which groups and which activities are their responsibility. Although other groups and functions that involve children on church premises are not the PCC’s direct responsibility, there is a duty of care which means informing outside groups of the procedures that they should follow.

Booking forms

The following clause should be incorporated in any booking form for church premises for which the PCC is responsible, both for one-off bookings and regular bookings:

“You are required to ensure that children are protected at all times, by taking all reasonable steps to prevent the occurrence of any injury, loss, damage or harm. Appropriate adult supervision should be provided”.

G39. One-off bookings

Give the organiser a copy of “Keeping Children and Young People Safe in Church” pocket guide for workers with children and young people. Advise the organiser of the ratio of helpers required for the numbers of children attending. Helpers will not need to fill in declaration forms.

G40. Regular bookings

Some organisations (guides, scouts, playgroups etc) will have their own Child Protection procedures which they must follow. Other groups must follow the recommendations in the government guidance “Working Together To Safeguard Children 2006”. They could be advised to adhere to the Diocesan Child Protection procedures and recommended good practice. Hiring could be made contingent on adherence to the Diocesan policy.

Minimum requirements are:

- Safe recruitment of adults with CRB disclosures for all leaders and helpers
- At least two workers for every group whatever the size, keeping a gender balance

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- If a child or young person is alone with a worker for any reason, there must always be another adult nearby and the child must be informed where that person is
 - No person under 18 should be left in charge of a group
 - A register must be kept of children attending the group which includes name, address, date of birth and next of kin

G41. Suggested agreements for outside groups

A sample agreement for use with outside groups is included.