



Diocesan Safeguarding Guidance for Parishes – Safeguarding Adults

**May 2014 (re-adopted August 2017)
Adopted by St Jude's PCC January 2018**

Contents

	Page
1 Explanatory Note (August 2017)	3
3 What to do if you're worried a child/adult is at risk of being abused	3
3.1 Flowchart for Responding to Concerns about a Child or Adults at Risk	5
4 Safeguarding Adults	6
4.1 What is Safeguarding?	6
4.2 What is 'Vulnerability'?	6
4.3 What do we mean by 'mistreatment' and 'harm'?	7
4.3.1 <i>Who might harm vulnerable adults?</i>	7
4.3.2 <i>How might harm to vulnerable adults happen?</i>	7
4.3.3 <i>Where might harm to vulnerable adults happen?</i>	8
4.3.4 <i>The prevalence of abuse of adults</i>	8
5 Definitions of Abuse (Adults)	9
5.1 Physical Abuse	9
5.2 Sexual Abuse	9
5.3 Psychological/Emotional Abuse	9
5.4 Financial/Material Abuse	9
5.5 Neglect	9
5.6 Discriminatory Abuse	9
5.7 Organised/Institutional Abuse	9
5.8 Spiritual Abuse	10
6 Signs & Symptoms of Abuse (Adults)	10
7 Good Practice Principles for Safeguarding Work with Adults	11
7.1 Creating Safer Environments	11
7.2 When might intervention be necessary?	11
8 Managing Offenders in the Church Context	13
8.1 Convicted Offenders against Children	13
8.2 Ministering to people who are known to have sexually abused children	14
8.3 The Agreement	15
8.4 Disclosures by perpetrators of past abuse	16
9 Supporting Survivors of Abuse	17
9.1 Diocesan Responsibilities	17
9.2 Parish Responsibilities	18
10 Parish Safeguarding Responsibilities (General Checklist)	19
Appendices	
A Diocesan Safeguarding Management Policy	21

B	Model Parish Recruitment of Ex-Offenders Policy	23
C	Model Parish Policy Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information	25

Explanatory Note (August 2017) – Please Read First

The House of Bishops released a new Safeguarding policy in 2017 which the Diocese of Exeter have adopted and encourage all parishes to adopt. This is a new policy in a more concise form that separates the policy and statements of intent regarding safeguarding from the safeguarding practice guidance. As of August 2017 when this new policy has been adopted, the new practice guidance documents to accompany the new policy have not yet been released. In the interim we recommend the continued adoption and adherence to the safeguarding guidance issued in May 2014. To this end you will find contained in this revised version of the May 2014 guidance all that information you are required to follow in the safeguarding of adults until the new practice guidance is released by the National Safeguarding Team.

What to do if you're worried a child/adult is at risk of being abused

Safeguarding children and adults at risk of abuse is everyone's responsibility. The Church has an important role to play in society as we possibly have more contact with children and their families than any other single body, organisation or agency. With this comes an opportunity to be alert, vigilant and prepared to both prevent harmful situations occurring and responding well in those cases where we suspect abuse has already occurred.

It is important that any individual who suspects or is worried that a child or vulnerable adult is being abused or may be at risk of abuse, is able to make that concern known in a clear and concise manner without delay. The diocese therefore provides the following guidance (supported also by the following flowchart):

- In the first instance, where safeguarding concerns relate to a member of the laity, contact should be made within 24 hours with the relevant Parish Safeguarding Representative.
- A written record must be made, signed and dated detailing the concern, allegation or disclosure. This must be passed to the Parish Safeguarding Representative and/or Diocesan Safeguarding Advisor (or Assistant) to assist in the decision-making process.
- The Parish Safeguarding Representative will consult with the Parish Priest/Vicar and the Diocesan Safeguarding Advisor to determine what action may need to be taken.
- It should be noted that if making contact with any of the above becomes problematic and risks delay causing the potential for greater or further harm, the concern should be escalated to the next step to achieve a timely response to safeguarding matters.
- If the safeguarding concern relates to a member of the clergy (or other person in a position of trust and responsibility), contact should be made within 24 hours directly with the Diocesan Safeguarding Advisor (or Assistant). A written record must be made in the same manner. The Diocesan Safeguarding Advisor will then consult with necessary parties to facilitate a prompt and effective response.

Where a report is made in relation to another person with responsibility within the local church, this is a potential form of 'whistleblowing'. For further advice please speak to the Diocesan Safeguarding Advisor on 01392 345909.

The Department's contact details are as follows:

Diocesan Safeguarding Advisor:

Charles Pitman

Tel: 01392 345909

Email: charles.pitman@exeter.anglican.org

Assistant Diocesan Safeguarding Advisor:

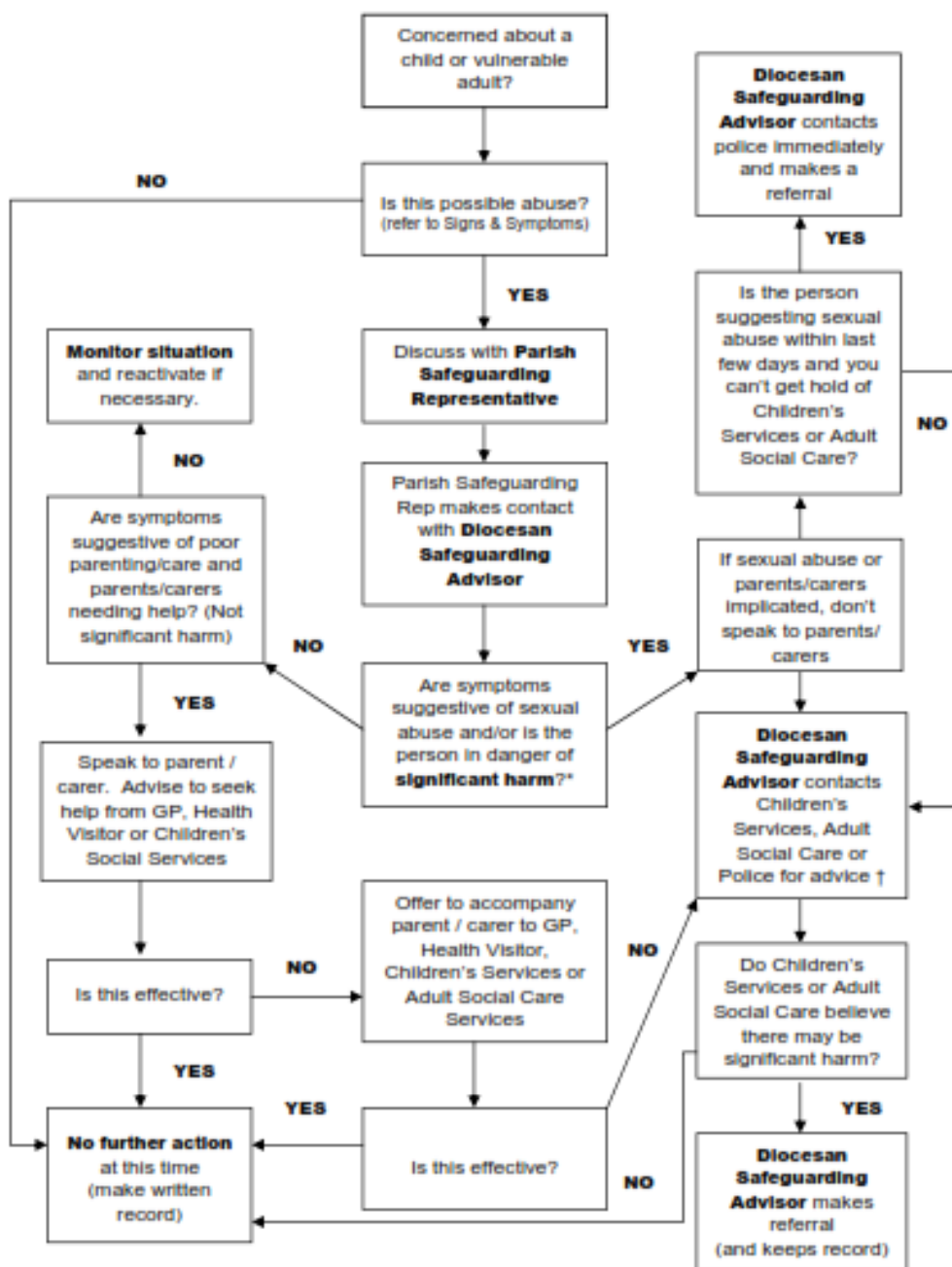
Phill Parker

Tel: 01392 294969

Email: dbs@exeter.anglican.org

Email addresses should not be used as the initial point of contact for any safeguarding concerns where there is the need for swift advice, unless there is no other means of making contact with the Diocesan Safeguarding Team. In the case of an emergency, contact should always be made with the Police by dialing **999**.

FLOWCHART FOR RESPONDING TO CONCERNS ABOUT A CHILD OR ADULT AT RISK



* Refer to safeguarding policy for guidance on 'significant harm'

† Where concerns are about an adult, due attention must be given to any wishes expressed about reporting following an assessment of their ability to make informed decisions and give informed consent.

Safeguarding Adults

'Promoting a Safe Church' (2006) seeks to raise the awareness of members of the Church of England of the needs of adults both within society in general and more particularly within the church community. It should be read in conjunction with the Church of England documents 'Protecting all God's Children' (2004) and 'Responding to Domestic Abuse – guidance for those with pastoral responsibilities' (2006). Society is recognising that people are being harmed when they are vulnerable for various reasons whether permanently or on a temporary basis and this abuse can take place in their own homes, in residential care, at work or in other activities including those provided by the Church. Some adults, who do not see themselves as 'vulnerable' under our working definition, may still find themselves exploited, bullied or abused. The safeguarding of adults when harm occurs is the responsibility of everyone. Awareness of the ways people can suffer harm encourages church members to be vigilant both within and outside the church community.

There is a particular responsibility for members of the Church to ensure that all people are treated with respect and that any complaints against church workers are dealt with promptly and fairly. Safeguarding adults within the Church is based on sound pastoral care and good practice.

What is Vulnerability?

Human beings are, by their very nature, subject to the chances and changes of this world. Each one has strengths and weaknesses, capacities and restrictions. At some time everyone will be vulnerable to a wide range of pressures, concerns or dangers. No one is 'invulnerable'; some people may consider themselves to be strong but, when circumstances change, strengths can quickly disappear. Some people by reason of their physical or social circumstances have higher levels of vulnerability than others. It is the Christian duty of everyone to recognize and support those who are identified as being more vulnerable. In supporting a vulnerable person we must do so with compassion and in a way that maintains dignity. Vulnerability is not an absolute; an individual cannot be labelled as 'vulnerable' in the same way as a child is regarded as such. Childhood is absolute: someone who is not yet eighteen years of age is, in the eyes of the law, a child; this is not the case with vulnerability. Some of the factors that increase vulnerability include:

- A sensory, or physical disability, or impairment
- A learning disability
- A physical illness
- Mental ill health (including dementia), chronic, or acute
- An addiction to alcohol, or drugs
- The failing faculties of old age
- A permanent, or temporary reduction in physical, mental, or emotional capacity brought on by life events e.g. bereavement, trauma, or previous abuse

Within this policy, the term 'Adult' will be used to describe an individual for whom any or all of the above may be applicable and for whom the working definition below may be applicable.

What do we mean by ‘mistreatment’ and ‘harm’?

To help us focus on those people for whom the Church should have a particular care, “Promoting a safe church” offers this working definition of vulnerability to help:

Any adult aged 18, or over, who, by reason of mental, or other disability, age, illness, or other situation is permanently, or for the time being unable to take care of him or herself, or to protect him, or herself against significant harm, or exploitation.

Mistreatment is defined in ‘No Secrets’ (2000)¹ as ‘a violation of an individual’s human and civil rights by any other person, or persons’.

In the church this could be any misuse of a pastoral or managerial relationship, from the most serious to less severe behaviour, which lies at its root. The term covers abuse, bullying and harassment. Harm is what results from mistreatment and abuse.

Who might harm adults?

Adults may be abused by a wide range of people including relatives and family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates, people who deliberately exploit vulnerable people and strangers. This includes those who work within the context of the Church.

There is often particular concern when abuse is perpetrated by someone in a position of power or authority who uses his or her position to the detriment of the health, safety, welfare and general wellbeing of a vulnerable person. Agencies not only have a responsibility to all vulnerable adults who have been abused but may also have responsibilities in relation to some perpetrators of abuse.

Stranger abuse will warrant a different kind of response from that appropriate to abuse in an ongoing relationship or in a care location. Nevertheless, in some instances it may be appropriate to use the locally agreed inter-agency adult protection procedures to ensure that the vulnerable person receives the services and support that they need. Such procedures may also be used when there is the potential for harm to other vulnerable people.

How might harm to adults happen?

Abuse of adults may occur on a single occasion or on multiple occasions. Those adults who are particularly vulnerable due to their circumstances (especially those within residential or institutional care settings) may benefit from additional safeguards that assist to prevent the potential for abuse.

Patterns of abuse and abusing vary and reflect very different dynamics. These include:

¹ ‘No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse’, Department of Health, 2000

- serial abusing in which the perpetrator seeks out and ‘grooms’ vulnerable individuals. Sexual abuse usually falls into this pattern as do some forms of financial abuse;
- long term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations;
- opportunistic abuse such as theft occurring because money has been left around;
- situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour;
- neglect of a person’s needs because those around him or her are not able to be responsible for their care, for example if the carer has difficulties attributable to such issues as debt, alcohol or mental health problems;
- institutional abuse which features poor care standards, lack of positive responses to complex needs, rigid routines, inadequate staffing and an insufficient knowledge base within the service;
- unacceptable ‘treatments’ or programmes which include sanctions or punishment such as withholding of food and drink, seclusion, unnecessary and unauthorised use of control and restraint or over-medication;
- failure of agencies to ensure staff receive appropriate guidance on anti-racist and anti-discriminatory practice;
- failure to access key services such as health care, dentistry, prostheses;
- misappropriation of benefits and/or use of the person’s money by other members of the household;
- fraud or intimidation in connection with wills, property or other assets.

Where might harm to adults happen?

Abuse can take place in any context. It may occur when an adult lives alone or with a relative; it may also occur within nursing, residential or day care settings, in hospitals, custodial situations, support services into people’s own homes, and other places previously assumed safe, or in public places, including churches.

Intervention will partly be determined by the environment or the context in which the abuse has occurred. Assessment of the environment, or context, is relevant, because exploitation, deception, misuse of authority, intimidation or coercion may render an adult incapable of making his or her own decisions. Thus, it may be important for the adult to be away from the sphere of influence of the abusive person or the setting in order to be able to make a free choice about how to proceed. An initial rejection of help should not always be taken at face value.

The prevalence of abuse of adults

Information from small scale studies (e.g. MENCAP 1999, DH/Action on Elder Abuse 2005) indicates that the prevalence of such abuse (within the population that is served by the accepted definitions of a ‘vulnerable adult’) is higher than in the rest of the adult population. Aspects of peoples’ lives that can explain this increased vulnerability to abuse include:

- Lack of inclusion in protective social networks, including education and employment
- Dependency on others (who may misuse their position) for vital needs including mobility, access to information and control of finances

- Lack of access to remedies for abuse and neglect
- Social acceptability of low standards for care and treatment
- Social acceptability of domestic abuse
- Dynamics of power within institutional care settings

It follows that a key aspect of the prevention of abuse and neglect is that local forums and planning processes (including churches) are accessible to, influenced by and monitor inclusion of, people covered by 'Safeguarding Adults' policies².

Definitions of Abuse (Adults)

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. The following are taken from 'No Secrets':

Physical Abuse may include hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

Sexual Abuse may include rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.

Psychological Abuse may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Financial/Material Abuse may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect (and acts of omission) may include ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Discriminatory Abuse may include racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

Institutional/Organised Abuse may occur where there is poor professional practice in a setting. This may take the form of isolated incidents of poor or unsatisfactory professional practice, at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. Repeated instances of poor care may be an indication of more serious problems.

² 'Safeguarding Adults: A national framework of standards for good practice and outcomes in adult protection work', ADSS, 2005

As in the case of definitions of abuse for children and young people, we also need to be aware of forms of abuse that are perpetrated in the name of religion, faith or spirituality that do not find consistent understanding and application outside of the church/faith environment:

Spiritual Abuse may occur when inappropriate expectations are imposed upon adults. It may involve conveying to them the dire consequences of sinfulness so causing them to accept what someone is preaching /teaching /saying through bullying and causing them to be fearful. To say “You won’t go the heaven if you get run over by a bus on your way home” is a form of bullying, exploitation of emotions, manipulation of minds and a corruption of the Gospel message.

Signs & Symptoms of Abuse (Adults)

It may not always be obvious that an adult is being subjected to mistreatment or abuse; and it may not be appropriate to question them at the time. However there may be general indicators that something is amiss and that the adult is unhappy about their situation. Marked change in their behaviour or disclosure of concerns should be discussed with the Church Safeguarding Officer.

<i>Physical Signs</i>	<i>Behavioural Signs</i>
<p>Some general indicators that may be noticed about the vulnerable person:</p> <ul style="list-style-type: none"> • covering up or rationalising, injuries or demeaning behaviours towards them • confusion and / or denial that anything is amiss despite marked deterioration • withdrawal from things that they normally engage with or do • not being allowed to speak for themselves, or see others without permission • flirtatious, precocious or expressive sexual behaviour out of character • indications of unusual confinement e.g. closed off in a room 	<p>Behaviours that may be observed about the carer, family member or the person close to the adult at risk include:</p> <ul style="list-style-type: none"> • getting the vulnerable person to pay for their (i.e. carer’s) shopping / petrol / tickets • taking advantage of their naivety or trust • attitudes of indifference or anger towards the vulnerable person • blaming or chastising them e.g. that soiling themselves was deliberate • aggressive or harsh behaviour (threats, insults, harassment) • inappropriate display of affection or care • social isolation or restriction of activity • obvious absence of assistance or attendance

Good Practice Principles for Working with Adults

All church activities which support an individual deemed vulnerable / at risk should follow these five principles:

- presume capacity – that people are capable of making decisions, unless there is evidence otherwise
- support individuals to make their own decisions – giving all practicable help before considering making any decisions on their behalf
- distinguish unwise decisions – recognise that the person retains the right to make seemingly eccentric or unwise decisions
- act in their best interests – in all decisions or activities on their behalf
- take the least restrictive option – in any action that might affect their basic rights and freedoms

Creating Safer Environments

Christian communities should be places where all people feel welcomed, respected and safe from abuse. The Church is particularly called by God to support those at the margins, those less powerful and those without a voice in our society. The Church can work towards creating a safe and non-discriminatory environment by being aware of some of the particular situations that create vulnerability. Issues which need to be considered include both the physical environment and the attitudes of workers. A person who might be considered vulnerable has the right to:

- be treated with respect and dignity;
- have their privacy respected;
- be able to lead as independent a life as possible;
- be able to choose how to lead their life;
- have the protection of the law;
- have their rights upheld regardless of their ethnicity, gender, sexuality, impairment or disability, age, religion or cultural background;
- be able to use their chosen language or method of communication;
- be heard.

When might intervention be necessary?

In determining how serious or extensive abuse must be to justify intervention a useful starting point can be found in 'Who Decides?'³. Building on the concept of 'significant harm' introduced in the Children Act, the Law Commission suggested that:

“‘harm’ should be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development’.”

³ 'Who Decides: Making decisions on behalf of mentally incapacitated adults', The Lord Chancellors Office, 1997

The seriousness or extent of abuse is often not clear when anxiety is first expressed. It is important, therefore, when considering the appropriateness of intervention, to approach reports of incidents or allegations with an open mind. In making any assessment of seriousness the following factors need to be considered:

- the vulnerability of the individual;
- the nature and extent of the abuse;
- the length of time it has been occurring;
- the impact on the individual; and
- the risk of repeated or increasingly serious acts involving this or other vulnerable adults.

What this means in practice is working through a process of assessment to evaluate:

- Is the person suffering harm or exploitation?
- Does the person suffering or causing harm/exploitation meet the NHS and Community Care Act (1990) eligibility criteria?
- Is the intervention in the best interests of the vulnerable adult fitting the criteria and/or in the public interest?
- Does the assessment account for the depth and conviction of the feelings of the person alleging the abuse?

Managing Offenders in the Church Context

The term 'offender' applies only to those who have a conviction or who have accepted a caution, reprimand or warning for a criminal offence. Note that acceptance of a caution is an admission of the offence and is, therefore, equivalent to a conviction. The caution will appear on the CRB/DBS certificate. The term 'suspected abuser' is used here to refer to those who have been the subject of allegations which have not been formally substantiated but which appear to be reasonably well founded.

Under the Rehabilitation of Offenders Act 1974 some old convictions and cautions are deemed spent after a period of time, which varies according to the offence. However, for the purpose of work with children or vulnerable adults no offence is considered spent. Some of those putting themselves forward for roles in the Church which involve or could involve working with children will have convictions or cautions on their record. A CRB/DBS check containing information of this kind is termed a positive, blemished or unclear disclosure. The term is also used if other relevant material is supplied.

It is the policy of the Church of England that all people with positive or blemished CRB/DBS checks should undergo a risk assessment from a suitably qualified person. The nature of the assessment should be proportionate to the matters disclosed. It is good practice for more than one person to be involved in the process of assessing risk. The diocesan safeguarding adviser should always be involved and will in certain cases commission a formal risk assessment. In the case of complex or borderline cases this good practice should include referral to a diocesan multi-disciplinary risk assessment panel. This can be a group drawn from the diocesan safeguarding management group.

Old, minor and unrelated offences will not prohibit otherwise suitable people from work with children. While not being complacent about risk, the Church understands that those who have done wrong are often capable of reform.

The same approach will be taken where the matters disclosed are not convictions but other relevant information which warrants or is in the process of investigation and risk assessment.

Anyone who seeks a position in the Church whose CRB/DBS check discloses that they are barred from working with children will be reported to the police by the DBS, as it is an offence for such a person to seek such work or for an employer knowingly to offer it.

Convicted offenders against children

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 among 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. They may still present

a risk to children. The church's duty to minister to all imposes a particular responsibility to such people.

However, this must not 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, should one 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 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. It would also include those who do not have convictions or cautions but where there are sound reasons for considering that they might present a risk to children. In appropriate cases the approach recommended below for managing sex offenders should be adopted.

Ministering to people who are known to have sexually abused children

Where 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 reoffending are diminished and the church has thus an important role contributing to the prevention of child abuse.

When it is known that a member of the congregation has sexually abused a child, the diocesan safeguarding children adviser must be consulted, so that a safe course of action can be agreed in conjunction with the relevant statutory agencies. A written agreement or contract will usually be entered into with the offender which reflects research evidence about the compulsive nature of child sexual abuse.

Where a small group is formed the membership should be chosen carefully. It should include the priest or a delegated representative, a churchwarden and a representative of the children or youth work team or the parish safeguarding children co-ordinator. The diocesan safeguarding children adviser should be consulted on the constitution of the group, and training of the group may be necessary.

If the offender's victim, or in some cases the victim's family, attends the church, it is likely to be necessary to introduce the offender to another congregation. Consideration must also be given to other people who have been abused in the past.

The offender should not accept any official role or office in the church which gives him or her status or authority; a child may deem that person to be trustworthy. Some roles, for example that of churchwarden, are statute-barred to people with convictions of this kind, including offences against the person.

A meeting should be held with the offender, explaining that the appointed small group and a few others from the congregation will need to know the facts in order to create a safe environment for

him or her. Those needing to know are likely to include the clergy, churchwardens, the safeguarding children co-ordinator and any befriending volunteers. The children's work co-ordinator will need to be informed so that he or she does not inadvertently ask the person to volunteer. The police should be invited to the meeting, in addition to the probation service, the local authority and children's social care, if they have a role.

Consideration should be given to whether, with the offender's agreement, the congregation should be told. The advantages and disadvantages of this course of action should be carefully considered, including the offender's need for protection as a vulnerable adult.

It must be made clear that no one else apart from those identified on the agreement will be informed of the facts without the offender's knowledge. The highest levels of confidentiality should be maintained unless there is a breach of the agreement and it is necessary to inform others to protect a child.

The group should offer support and friendship as well as supervision. They should endeavour to keep channels of communication open.

Those with pastoral responsibility will need to discuss with the group appropriate ways for the offender to develop and grow as a Christian without putting him- or herself and others at risk.

The Agreement

It will be necessary to establish clear boundaries, both to protect children and to lessen the possibility of the adult being wrongly accused of abuse. The diocesan safeguarding children adviser should assist in drafting a written agreement (referred to as a contract in the MAPPA guidance above) which might include the following elements:

- attend designated services or meetings only
- sit apart from children
- stay away from areas of the building where children meet
- attend a house group where there are no children
- decline hospitality where there are children
- never be alone with children
- never work or be part of a mixed-age group with children
- take no official role in the church.

The offender should be asked to sign the agreement. Other parties will be members of the group noted earlier. It should be made clear that as people change role, their successors will take on becoming involved.

The agreement should be enforced, and no changes made without consultation with the diocesan safeguarding children adviser and other parties involved. It should be made clear that a breach or other relevant information could lead to a referral to the police and probation service and advice that the offender attends a different church.

The agreement should include provision for close support and pastoral care.

The agreement should be reviewed at regular intervals, at least annually, with the diocesan safeguarding children adviser. A review must take the form of a face-to-face meeting with the offender and at least two members of the group. The meeting should be recorded and the record retained.

An agreement must remain in place so long as the person is a part of the congregation, whether or not they are on licence or their name appears on the Sex Offenders Register.

If the agreement is breached, the police or the probation service should be informed. In some cases it may be possible to restrict attendance at church. If the person cannot be banned because they live in the parish, the advice of the diocesan registrar should be sought and a high level of supervision maintained. It may be necessary, following consultation with the police, to inform other relevant organizations that the person presents a risk.

If the person leaves the church for another church, then the police should be involved and a new agreement should be made. If the person leaves without informing anyone where or whether they might attend for worship, the police should be informed.

Whenever possible, the agreement should be drawn up as a two-way covenant: the church will agree to levels of support and appropriate access to worship etc. while the offender agrees to the appropriate behavioural guidelines included in the agreement.

Disclosures by perpetrators of past abuse

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; therefore, the police should be informed of the offences.

Supporting Survivors of Abuse

In 2002, Churches Together in Britain and Ireland published a report, 'Time for Action: Sexual Abuse, the Churches and a New Dawn for Survivors'. Since then, the Church has increasingly recognized the need to minister to survivors of sexual abuse. With the more recent completion of the Church of England's Past Child Protection Cases Review (2009), the visitation reports into the abuses suffered in the Diocese of Chichester (2012 and 2013) and developments in best practice concerning the protection of children and adults, it is timely to address the injustices suffered by survivors within our own communities.

Progress has been made in recognizing the consequences of sexual abuse. However, at both an individual and at church level, survivors of sexual abuse still see a need for better support and action in recognition of their suffering and pain. They continue to press the Church to provide safer communities where their experiences of abuse can be heard, and support offered.

Churches can be well placed, often in the heart of our communities, to offer safer places for survivors to come and where they can share their experiences. The call to follow Christ challenges us to stand at the edge of society and hear the needs of those whom we encounter on our journey. We are challenged to move beyond our own fears and reach out in compassion to those who need our support. In many situations this will only mean developing or adapting existing good work where pastoral ministry is given to those in need or marginalized within society (for example, bereavement support), so that our experience and skills within such fields can be extended in compassionate response to survivors of sexual abuse. In doing so, the Church gains hugely from the wisdom and the knowledge of the survivors themselves, who can contribute greatly to our communities.

Most survivors want to be heard and to have their very real pain and hurt acknowledged. They also want a compassionate response from the Church and to see action where this is needed to ensure others are safe. In cases where the context of abuse has been the Church, those who have been abused often want to be listened to and heard directly by someone in authority either within the diocese or nationally. Such meetings have been successfully held in other parts of the Anglican Communion and good practice has been developed.

Diocesan Responsibilities

In order to respond well to those who disclose abuse from their childhood once adults, the diocese recognizes a number of key responsibilities that must be active to meet the needs of adult survivors:

Diocesan Safeguarding Adviser – There are two distinct roles in working with issues relating to children and vulnerable adults, but the roles are sometimes combined, as they are in currently in the Diocese of Exeter. Information about abuse can reach the diocese through a wide variety of routes. The Adviser provides a source of expertise and advice about all matters relating to abuse. At a minimum, the Diocesan Safeguarding Adviser should always be informed by the diocese of

those cases that relate to clergy, employees or volunteers, and where matters are before a criminal or family court.

Authorised Listeners – Each diocese should appoint carefully chosen, competent and trained people who will be able to be ‘authorized listeners’ for those who disclose, in particular for those who disclose abuse from within the church community.

External Authorities – Diocesan authorities need to remember their wider duty to the general public and also their accountability to civil authorities in matters of sexual abuse. Whether or not the alleged abuse has taken place within a church context, a crime may have been committed and others could be at risk. The Diocesan Safeguarding Adviser will be able to provide further advice and have details of the appropriate contacts.

Training Needs – ‘Protecting All God’s Children’ places a requirement upon each diocese to provide training on safeguarding for all clergy and licensed lay workers either before they take up their appointment or during their first year in post. Pastoral response and care of those who have been abused should either be included in such training or made an additional requirement.

Parish Responsibilities

In addition to the diocesan responsibilities, parishes are required to ensure that the environments in which disclosures of past and non-recent abuse are voiced are open and responsive. Those who have suffered sexual abuse may first disclose this within the life of their local parish church. This means that each parish should reflect the following:

- **Church for all** – Ensure that the church has a healthy culture of welcome and inclusion, which affirms personal value for all and where no one feels inappropriately judged.
- **Self criticism** – We can always do better, but only if we remain open to criticism and avoid complacency. This will help to avoid the dangers of falling into denial and defensiveness if a complaint is ever made. There should always be a healthy intolerance of behaviour that is unholy.
- **Training** – Clergy and others with pastoral responsibilities should have adequate training. This should include the provision of appropriate responses and support for any who have suffered sexual abuse.
- **Whole-church awareness** – Well-informed communities become safer and more caring places. It is recommended that training be arranged within the deanery or parish level, ensuring that it is led by those sensitive to the needs of survivors.
- **Specific sources of support** – All parishes should have named individuals who have particular responsibilities for safeguarding children and/or adults. These people may be a good first point of contact for a survivor who wishes to disclose. Their names should be made available on church noticeboards.
- **Link with the diocese** – The Diocesan Safeguarding Adviser will be a source of guidance and support for churches encountering issues around sexual abuse. At a minimum, the Diocesan Safeguarding Adviser should always be informed by the parish of those cases which relate to clergy, employees and volunteers, and where matters are before a criminal or family court.

Parish Safeguarding Responsibilities (General Checklist)

Each parish (or benefice) should accept the prime duty of care placed upon the incumbent and the parochial church council to ensure the wellbeing of children in their care. In order to meet this responsibility, the PCC on behalf of the parish should:

- Create a culture of ‘informed vigilance’, which takes children and adults at risk seriously.
- Ensure that appropriate health and safety policies and procedures are in place.
- Provide appropriate insurance cover for all activities undertaken in the name of the parish.
- Ensure that current Health and Safety requirements are met for all groups involving children or adults. (Child care providers e.g. pre-school and nursery groups or afterschool clubs should take advice from the Diocesan Children’s & Youth Advisor about the regulations for their activity and the need to register the group with the Local Authority).
- Agree and implement a Parish Safeguarding Policy. This should be compliant with and incorporate the formal adoption of the Diocesan Safeguarding Policy, which is based on the House of Bishops’ Policy. Explicit consideration should also be given to specific local parish requirements.
- Appoint a Parish Safeguarding Representative, and inform the Diocesan Safeguarding Advisor of this person’s details. (The Parish Safeguarding Representative should be someone without other pastoral responsibility for children or adults in the parish. This person must ensure that any concerns about a child or adult, or the behaviour of an adult towards others, are appropriately reported both to the statutory agencies and to the Archdeacon. The Parish Safeguarding Representative post is subject to a Disclosure and Barring Service check).
- Ensure that appropriate pastoral care is available for those adults who have disclosed that they have been abused as children.
- Provide, as appropriate, support for all parents and families in the congregation, being particularly aware of parents whose children have suffered abuse.
- Ensure that those who may pose a threat to children and young people are effectively managed and monitored.
- Appoint a person, who may be different from the Parish Safeguarding Representative, to be a children’s advocate. (This person should be someone whom children know they can talk to about any problems, if they so wish).
- Display the “Childline” telephone number prominently on a notice-board that is accessible to children.
- Ensure that all those authorised to work with children and young people, or in a position of authority, are recruited according to current Safer Recruitment Practice guidelines, and appropriately appointed, trained and supported while in post.
- Provide all personnel authorised by the PCC to work with children with a copy of the Parish Safeguarding Policy, Procedures and any Good Practice Guidelines.
- Pay particular attention to children with special needs and those from ethnic minorities, to ensure their full integration within the church community, remembering that children with disability or those for whom English is not their first language or are isolated in any way are always more vulnerable to abuse.
- Review the implementation of the Parish Safeguarding Policy, Procedures and any Good Practice Guidelines at least annually, to ensure that the Parish is adhering to the practice laid

down within the Policy. (Mission Communities, Rural parishes or parishes held in plurality may wish to join together to implement the Policy and Procedures. It should be noted, however, that people working in isolated situations can be vulnerable and extra care should be taken to ensure that behavioural guidance and Safeguarding Policy, Procedures and any Good Practice Guidelines are followed).

- Provide appropriate insurance cover for all activities with children and young people that are undertaken in the name of the parish. (Local ecumenical projects should agree which denomination's Child Protection Policy to follow, and this decision should be ratified by the Archdeacon and other appropriate church leaders).

Please note, legally the responsibility for ensuring safeguarding falls to the incumbent and the PCC. This cannot be changed by local arrangement. However, how that responsibility is discharged can vary considerably according to the context. As long as each PCC and incumbent formally records the decisions that it makes, provision, be it for safeguarding representatives, advocates or local safeguarding policies, can be shared between several parishes in the same benefice or mission community. This checklist can therefore apply by extension to more than one parish acting in concert.

Appendix A

Diocesan Safeguarding Management Policy

A wide range of people are involved in and responsible for the work of safeguarding in the Diocese of Exeter. The greatest number of these are the ordinary members of the laity of the Diocese who are encouraged to develop an attitude of informed vigilance about safeguarding in the parochial context. In that parish context, clergy, members of parochial church councils, safeguarding representatives and people involved in work with children and young people all have particular and important roles to play in ensuring that safeguarding is carried out effectively and consistently. Clergy have specific obligations to discharge (for example in relation to attendance at appropriate training) that if not fulfilled satisfactorily, can lead to an evaluation of their performance and approach (through Ministerial Review or a complaint through the Clergy Discipline Measure).

Diocesan Safeguarding Adviser

Beyond the parochial context there is a network of relationships and responsibilities that determine how safeguarding is to be managed. Often these cohere around the work of the Diocesan Safeguarding Adviser but it is by no means the case that the Safeguarding Adviser is responsible for all safeguarding in the Diocese. Much of the detail of the Safeguarding Management Policy is to be found in the Safeguarding Protocol.

In organizational terms, the Safeguarding Adviser supports the work of the Diocesan Bishop in respect of clergy beneficed or licensed in the Diocese or holding the Bishop's Permission to Officiate, as well as licensed Readers and Lay Workers. The Safeguarding Adviser is line-managed by the Director of Human Resources, who also has oversight of safeguarding policy (which, for the most part, is developed and implemented by the Safeguarding Adviser). The Director of Human Resources is a regular contributor to the work of the Bishop's Staff, although there may be occasions when the Staff require input directly from the Safeguarding Adviser.

The Safeguarding Adviser in turn line manages the Assistant Safeguarding Adviser, including a responsibility for the Assistant's professional development. Given the nature of the casework involved, provision is also made for the Safeguarding Adviser to have regular access to a professional, external and independent mentor. Similar provision is also made available to the Assistant Adviser.

Diocesan Safeguarding Management Group

The Safeguarding Adviser provides much of the capacity behind the Diocesan Safeguarding Management Group (DSMG). The independent Chair of DSMG is appointed by the Bishop's Diocesan Council and the Chair and the Safeguarding Adviser meet with the Diocesan Bishop on a regular basis. The DSMG formally also submits an annual report to the Bishop's Diocesan Council. The members of DSMG are drawn from within the life of the Diocese (typically including one archdeacon and any more local church representatives such as archdeaconry safeguarding advisers and the Cathedral safeguarding representative) and from other statutory organizations that also have safeguarding responsibilities (such as the local authority, police and probation service). The

DSMG establishes the parameters for the multi-agency aspects of safeguarding that then get implemented through a bespoke 'core group' each time a case arises.

Safeguarding Files

With the support of the Assistant Safeguarding Adviser, the Safeguarding Adviser is responsible for the correct maintenance of the safeguarding files. The Director of Human Resources works with the Safeguarding Adviser and the Diocesan Bishop's personal staff to ensure that the clergy 'blue files' contain all necessary safeguarding information (as set out in the national guidance), that the blue files relate correctly to the safeguarding files and that both are appropriately comprehensive and up-to-date.

Disclosure and Barring Service

Since the Safeguarding Adviser has direct responsibility for casework arising from criminal record checks through the Disclosure and Barring Service, as well as policy oversight for the same, a good working relationship has to exist with the Diocesan DBS Co-ordinator (as well as with, by implication, diocesan countersignatories). This is not at present at line management relationship but there needs to be clear communication and agreement on systems and the implementation of developments in policy and practice.

Appendix B

Model Parish Recruitment of Ex-Offenders Policy

The Diocese of Exeter uses the Disclosure and Barring Service (DBS) to assess the suitability of both volunteers and applicants for employment in positions of trust. We comply fully with the DBS Code of Practice and undertake to treat all volunteers/applicants fairly. We undertake not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.

Having a criminal record will not necessarily bar a volunteer/applicant from working within the diocese. This will depend on the nature of the position and the circumstances and background of the offences.

Where appropriate and justified under the current regulations, volunteers and applicants who are offered employment will be asked to apply for a check of their criminal record from the Disclosure and Barring Service before the appointment is confirmed. Enhanced Disclosures will include details of cautions, reprimands or final warnings, as well as convictions, and also information relating to police enquiries and pending prosecutions. An Enhanced Plus check will also involve a check against the barred list(s) for regulated activity with children and/or adults. It is illegal for a person who is on the appropriate barred list to apply to undertake regulated activity, just as it is illegal for an organization knowingly to enable such a person to undertake regulated activity on its behalf.

Applicants for Employment

- Our written Policy for the Recruitment of Ex-Offenders will be made available to all Disclosure applicants on request at the outset of the recruitment process.
- For those positions where a Disclosure is required, all application forms and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- Where a Disclosure is to form part of the recruitment process, all applicants called for interview will be encouraged to provide details of their criminal record at an early stage in the application process through a Confidential Declaration form. Such information should be sent, under separate and confidential cover, to a designated person within the Diocese of Exeter. We guarantee that this information will be seen only by those who need to see it as part of the recruitment process.
- For posts not involving regulated activity or otherwise including contact with children and young people, we will only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974 as part of the application process. For those posts that do involve regulated or other related activity, applicants will be asked whether they have any convictions, cautions, reprimands or final warnings which would not be filtered in line with current guidance.

- The person designated to assess the implications of any convictions with respect to the post applied for (normally the DSA or the Director of Human Resources), will have been suitably trained to identify and assess the relevance and circumstances of offences. They are familiar with the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, we will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to the withdrawal of an offer of employment.
- Every subject of a DBS check will have access to the DBS Code of Practice, and copies will be available on request or can be viewed on the [Diocesan website](#).
- We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

Volunteers

- Those involved in the recruitment of volunteers will make it clear to a candidate whenever a Disclosure is required.
- Every subject of a DBS check will have access to the DBS Code of Practice, and copies will be available on request.
- Our written Policy for the Recruitment of Ex-Offenders will be made available to all Disclosure applicants on request at the outset of the recruitment process.
- All Disclosure applicants will be invited to provide details of any criminal record at an early stage through a Confidential Declaration form.
- We guarantee that Disclosure information will be seen only by those who need to see it as part of the recruitment process.
- The person designated to assess the implications of any convictions with respect to the post applied for (normally the DSA or the Director of Human Resources), will have been suitably trained to identify and assess the relevance and circumstances of offences. They are familiar with the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

We undertake to discuss with a volunteer any matters revealed in a Disclosure which relate directly to the position for which they have offered themselves. The welfare of children and vulnerable adults will always be our first concern.

Appendix C

Model Parish Policy Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, the Parochial Church Council of complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information. This written policy is available on request to all those who wish to see it.

Storage and Access

Disclosure information is never kept on an applicant's personal file and is always kept separately and securely in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it within the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

If a party other than the Diocese requests the passing on of Disclosure information, advice will be sought from DBS before doing so.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six-months after the decision has been taken, we will consult the DBS about this. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail. The DBS will be informed immediately if a Disclosure document, or additional information provided by the police, is mislaid or lost.

Disposal

Once the retention period has elapsed, or sooner, we will ensure that any Disclosure information is

destroyed by shredding. Prior to shredding the Disclosure documents will always be kept in secure places as described above. We will not retain any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure.

Notwithstanding the above, a record will be kept of: the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested (including the designated workforce; child, adult or both), the position for which the Disclosure was requested, the unique reference number of the Disclosure, and the details of the recruitment decision taken.