



Safeguarding Children, Young People and Adults

Version 3.0 | May 2026

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HERNE BAY EVANGELICAL FREE CHURCH

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Document Revision History

Version number	Date	Reason for changes
Version 1.0	May 2023	Version 1.0 of this document was called 'Safeguarding Policy, Procedures & Codes of Conduct' and was created using the CSS template, current at that time. It superseded the previous HBEFC document ' <i>Safeguarding Children and Vulnerable Adults Policy and Guidance Notes for Children and Youth Workers</i> ', dated November 2015, and all its revisions.
Version 2.0	February 2025	Updated using CSS most recent template. Document name changed to ' <i>Safeguarding Children, Young People and Adults</i> '. Sections A - E contain material from Sections 1 -16 of Version 1.0, with updates, additional material and revisions. Section F contains appendices as Version 1.0 with minor updates. Previous Appendix K is included in Section B.
Version 3.0	May 2026	Updated broadly based on CSS most recent template. Miscellaneous edits to wording, and the following structural changes: Section B: New subtitle and additional text: Governance and membership New Section C: Definition of terms used in this policy Renamed Section D: originally Section C. 'Our responsibilities...' section - consolidation of numbered items. Renamed Section E: originally Section D New Appendix 4: Low level concerns New Appendix 5 - Safeguarding guidelines for communicating with under 18s via electronic devices and livestreaming meetings where vulnerable people are present New Appendix 6 - Taking, Storing and using Images Policy Appendix 7 - Forms SG007 and 008 removed (Complaints) - superseded by separate HBEFC Complaints Policy Renumbered Appendices 10 -13

Contents

Document Revision History	2
Contents	3
Section A: Safeguarding Statement	5
Section B: Church Context	5
Section C: Definitions of Terms used in this Policy	6
Section D: Safeguarding Policy	8
Purpose and Scope	8
Our responsibilities and commitments	8
Section E: Safeguarding Procedures	10
1. Governance and oversight	10
2. Recruitment and ongoing support of staff and volunteers	10
3. Management of recruitment processes	10
4. Recruitment process	11
5. DBS Checks	11
6. Blemished DBS Checks	12
7. Probationary / settling in periods.	13
8. Ongoing support and supervision	13
9. Training	13
10. Young Volunteers	13
11. Ensuring a safe and healthy environment	14
12. Responding to safeguarding concerns or disclosures	16
13. Sub-threshold concerns and Early Help	17
14. Disclosure of historic child abuse by an adult	18
15. Allegations against or concerns about staff and volunteers	18
16. Management of ex-offenders or those who pose an actual or potential risk to others, particularly to vulnerable people.	19
17. Complaints and concerns	19
Section F: Codes of Conduct	20
Code of conduct for staff and volunteers working with children or young people	20
Code of conduct for staff and volunteers working with Adults	22
Code of conduct for staff and volunteers providing pastoral care	23
Section G: Appendices	24
Appendix 1: Safeguarding responsibilities	25
Appendix 2: Key safeguarding contacts	26
Appendix 3: Basis of the policies and procedures and the legal framework	27
Appendix 4: Low-level Concerns	29
Appendix 5: Safeguarding guidelines for communicating with under 18s via electronic devices and livestreaming meetings where vulnerable people are present	30
Appendix 6: Taking, Storing and using Images Policy	33
Appendix 7: Standard Document Samples	35
Appendix 8: Process flowcharts	47
Appendix 9: Safeguarding poster	49
Appendix 10: Guidelines for prevention of Bullying	50

Appendix 11 : Detailed guidelines on working with adults who pose a risk to children and adults	
52	
Appendix 12: Lift giving	53
Appendix 13 Whistleblowing	54

Section A: Safeguarding Statement

Herne Bay Evangelical Free Church (hereafter, 'HBEFC') is committed to creating a safe environment for all, and especially those who are vulnerable.

We recognise that within any church there is the opportunity for individuals or groups to harm, abuse, or exploit others, including misuse of power, bullying and/or harassment. Our safeguarding policies, procedures, codes of conduct and systems are designed not merely to fulfill our statutory duties, but to follow best practice.

More broadly, we seek to encourage a church community culture where concerns about anything that we do can be raised, whether informally with the leadership team, or via the Safeguarding or Complaints procedures, as appropriate.

Section B: Church Context

HBEFC is an independent church, located in Hampton, a residential area of Herne Bay. We are affiliated to [the FIEC](#). We are a charity registered with the Charity Commission of England and Wales ([Charity number: 1178886](#)).

Our beliefs are outlined in our statement of faith, doctrinal distinctives and ethical standards - published [on our website](#) and displayed in the church.

HBEFC is led by a team of [church officers](#): Elders (who are also charity trustees), supported by Deacons. Significant decisions are made by general meetings of the Church Members.

We hold regular all-age meetings for public worship, prayer, Bible study, training and fellowship; outreach events and courses; activities for children and young people including Sunday groups, holiday Bible clubs and one-off events.

Hampton Nursery School use part of the church site each termtime weekday morning. Another part of the site is regularly used for private home education. Both areas are self-contained and secured, to ensure mutual separation of our activities. These activities do not fall within the responsibility or oversight of the Church. These users must operate their own safeguarding policies and procedures and comply with any other relevant legal duties.

Section C: Definitions of Terms used in this Policy

Adult at risk of abuse: An individual aged 18 years or above who has care and support needs (see below), is experiencing, or is at risk of, abuse or neglect and as a result of their care and support needs is unable to protect themselves against the abuse or neglect or the risk of it.

Adult with care and support needs: An individual aged 18 years or above who needs extra help to manage their lives and be independent - including older people, people with a disability or long-term illness, people with mental health problems, and carers. Care and support can be practical, financial or emotional support.

Adult Social Care: is provided by Local Authorities (councils) to adults aged 18 years and over who meet the criteria for either adult with care and support needs or adults at risk of abuse or neglect.

Allegation: a claim that a member of staff, volunteer, or anyone acting on behalf of the charity, has behaved in a way that may be harmful to a child or adult at risk.

Child: Anyone under the age of 18.

Children Social Care: is provided by Local Authorities (councils) to under 18s who require protection from risk of harm or require support because of additional needs.

Concern: refers to a situation where signs or indicators that an individual might be at risk of harm, abuse or neglect have been identified.

DBS: the Disclosure and Barring Service.

DSL: the Designated Safeguarding Lead.

Deacon(s): refers to those appointed by the church to that office to support the Elders and serve the church in practical matters.

Disclosure: when an individual communicates that they have been (or are worried they may be) abused or neglected.

Domestic Abuse: refers to a single incident or a course of behaviour where someone's behaviour towards another is abusive, and where the people involved are aged 16 or over and are, or have been, personally connected to each other. Behaviour is defined as abusive if it consists of any of the following: physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, or emotional abuse.

Early Help: describes any service that supports children and their families as problems emerge. The aim of Early Help is to prevent escalating need or risk and improve children and young people's outcomes.

Elder(s): refers to those appointed by the church to that office to provide spiritual leadership and instruction. The Elders have the spiritual authority within the church.

GDPR: the General Data Protection Regulation and the Data Protection Act 2018.

Investigating Officer: An individual appointed by the Elders to take the lead in an investigation into a complaint or allegation which does not come under the safeguarding remit of the DSL.

LADO: The Local Authority Designated Officer is responsible for managing allegations against adults who work with children. The LADO does not conduct investigations directly, but rather oversees and directs them to ensure thoroughness, timeliness and fairness.

Low-level concern: is any concern that an adult working or volunteering may have acted in a way that is inconsistent with the code of conduct, including inappropriate conduct outside of work, and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

LSAB: Local Safeguarding Adults Board (in some areas known as Local Safeguarding Adults Partnership). Their main role is to help and safeguard adults with care and support needs within their locality. They take the lead on adult safeguarding arrangements across its locality and oversee and coordinate the effectiveness of the safeguarding work of its member and partner agencies.

LSCP: Local Safeguarding Children's Partnership (in some areas are called Safeguarding Children's Board) are responsible for agreeing how services and agencies work together to safeguard and promote the welfare of children and young people in their locality and ensuring that they do so effectively. Three safeguarding partners (Local Authority, Police and Health) have a shared and equal duty to make arrangements to work together to safeguard and promote the welfare of all children in their local area.

Officers: refers to all those who hold formal office in the church including Elders, Deacons and Trustees.

Position of Trust: refers to an adult 'caring for, training, supervising or being in sole charge' of a child under the age of 18. It is against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent.

Regulated activity: refers to activity that a barred person must not engage in. In simple terms, it is an activity requiring a DBS check.

Safeguarding arrangements: is used in this policy, and our procedures and related documents as a generic term that includes all aspects of the church's approach to safeguarding, including matters related to policy, process, culture and practice.

Single Central Record: is the master record of all pre-appointment checks and processes that were completed prior to appointment to a role.

Sub-threshold (or consent based) safeguarding: matters or concerns which do not meet the criteria for mandatory referral to statutory authorities. These issues may still be serious and require a response from the church, and internal processes will be followed.

Trustee(s): refers to those who are legally responsible for the governance and oversight of the charity.

Universal safeguarding: activity that is required to keep everyone safe. This includes those who have no additional needs and includes the interface with other aspects of safety such as Health and Safety and employer responsibilities.

Section D: Safeguarding Policy

Purpose and Scope

This policy outlines our moral and legal responsibilities and corresponding commitments, with a specific focus on safeguarding those who have particular vulnerabilities.

The requirements of this policy apply to everyone who acts for HBEFC, whether volunteers, staff, officers, or anyone else. It applies to all the official activities of the church.

Our responsibilities and commitments

1. General duty of care.

We have a general duty of care towards everyone involved in the life of our church. All people are made in God's image, deserving to be treated with dignity and respect.

We will:

- a. Identify and manage risk appropriately through our policies and procedures, our risk register and our risk assessments.
- b. Develop a church culture that is healthy and nurturing, respectful and impartial.
- c. Share information as appropriate between the safeguarding and pastoral teams, to help us exercise care. We will retain records of sub-threshold concerns where necessary.

2. Particular duty of care.

We have a particular responsibility to those who are more vulnerable including children and young people (i.e. those who are under 18 years of age), adults with care and support needs, and adults at risk of abuse / in need of protection (as defined in the 2014 Care Act).

We will:

- a. Establish proportionate safeguarding arrangements.
- b. Ensure legal compliance and strive for best practice.
- c. Monitor the effectiveness of the safeguarding arrangements.
- d. Be aware of adults with sub-threshold vulnerabilities and offer appropriate support, including signposting to other support organisations.

3. Church culture.

We recognise the need to be vigilant within the church, and to oppose all forms of abuse, exploitation or other injustice in our midst. We seek to promote a transparent culture.

We will:

- a. Establish clear expectations and standards for all who act on our behalf.
- b. Establish clear processes for handling abuse that is discovered or disclosed; whether that abuse has occurred in the church or elsewhere.
- c. Promote across the whole church community the importance of caring well for everyone, and the awareness that 'It could happen here'.
- d. Challenge any form of bullying, harassment, abuse, exploitation, or any other harmful contact; both in the online and the physical environments.
- e. Value, respect and listen to the wishes and views of every member of our community, including children and young people, and others who are vulnerable or find it difficult to make their voice heard.

4. Governance and leadership.

We recognise both the Biblical pattern of servant-hearted leadership, and our governance responsibilities under charity law and Charity Commission guidance. We understand that the charity trustees share the final legal responsibility for safeguarding.

We will:

- a. Appoint a suitably trained, competent and experienced Designated Safeguarding Lead (DSL) and at least one deputy to support them, and perform specific delegated tasks.
- b. Appoint a Safeguarding Trustee, to champion safeguarding on behalf of the trustees, and support the Designated Safeguarding Lead (DSL).
- c. Visibly demonstrate our commitment to safeguarding throughout the church.
- d. Provide support, oversight and accountability to everyone who works (whether paid or voluntarily) on our behalf, including church leaders. We will encourage ongoing reflection, learning and improvement.
- e. Monitor the effectiveness of the arrangements that we have implemented.
- f. Ensure that delegated safeguarding roles and responsibilities are clearly defined, and that appropriate accountability and support are provided to those fulfilling the roles.

5. Safeguarding arrangements.

We recognise our statutory obligations to ensure compliant and effective safeguarding arrangements are in place.

We will:

- a. Maintain compliant safeguarding policies, procedures, and systems and review these at least annually.
- b. Ensure that relevant safeguarding information is publicly available.
- c. Maintain compliant records.
- d. Share information with relevant statutory bodies and other services as required.
- e. Involve parents, children and young people and adults with support needs or in need of protection in the decisions that affect them as far as they are able.

6. Safe recruitment.

We recognise that we have a responsibility to ensure that those who act on our behalf meet safe recruitment criteria and are competent and suitable for their roles.

We will:

- a. Implement proportionate processes for safe recruitment of staff and volunteers.
- b. Report any above-threshold safeguarding concerns arising from the process appropriately and in a timely manner.
- c. Ensure competence and suitability of staff and volunteers.
- d. Provide support, guidance, oversight, and accountability for staff and volunteers.
- e. Provide training and skills development as required, including awareness of societal safeguarding risks (grooming, online abuse, radicalisation, gender-based violence, exploitation, domestic abuse etc.).

7. Supporting those who have experienced abuse or other trauma.

When working with those who have experienced abuse or trauma, or those who are experiencing poor mental health etc, we will seek to do so with sensitivity and keeping them at the centre of the work we do. We will seek to give them a voice and allow them to progress at their own pace while recognising the limits of our own competence and signposting to specialist support where required.

Section E: Safeguarding Procedures

1. Governance and oversight

The Trustees will provide effective oversight of safeguarding across the church by:

- a. Ensuring that they appoint from amongst their number a nominated Safeguarding Trustee who will act on their behalf to provide strategic leadership and guidance on matters related to safeguarding including compliance.
- b. Ensuring that the church leadership promote the importance of safeguarding and lead the development of a culture that is biblically faithful, healthy, transparent, and accountable and that safeguarding is appropriately prioritised, and its profile maintained.
- c. Ensuring that a suitably knowledgeable and appropriately trained and skilled Designated Safeguarding Lead (DSL) and a deputy are appointed and that they are adequately supported and resourced.
- d. Ensuring that a proportionate and legally compliant safeguarding policy is implemented and that it is reviewed by the trustees with input and support from the DSL and Deputy DSL at least annually.
- e. Ensuring that clearly defined safeguarding procedures and systems are in place, that they are understood and implemented by all staff, volunteers, and anyone else who acts on our behalf.
- f. Ensuring that the DSL provides a verbal update to all trustee meetings (which will be conveyed by the safeguarding trustee) and that a written annual report is provided to the trustees by the Safeguarding Trustee, the DSL, and Deputy DSL.
- g. Ensuring that the effectiveness of the safeguarding arrangements is monitored on an ongoing basis and reviewed annually in line with the review of the policy and procedures.
- h. Ensuring that safeguarding roles and responsibilities are clearly defined ([see appendix 1](#)), and that appropriate accountability is provided.
- i. That a clear statement in relation to safeguarding is included in the annual Charity Commission submission.
- j. That any "Serious Incidents" (as defined in the Charity Commission Guidance - <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>) are reported accurately and in a timely manner.

2. Recruitment and ongoing support of staff and volunteers

The recruitment / appointment and support of staff and volunteers is of critical importance to Herne Bay Evangelical Free Church and to our work and ministry. To fulfil our legal duties and to ensure we meet the still higher standards dictated by scripture, all staff and volunteers will be subject to appropriate recruitment processes.

3. Management of recruitment processes

- a. At least one person who is involved in the process of recruitment of staff or appointment of volunteers will be trained in Safe Recruitment.
- b. Staff and volunteers will be provided with written Job / role descriptions and person specifications prior to deciding whether to take up the position / role.
- c. Roles that involve regulated activity and which consequently are subject to a [Disclosure and Barring Service \(DBS\) check](#) will be clearly identified as exempt from the Rehabilitation of Offenders Act.
- d. Appropriate records will be kept of all recruitment processes and decisions.
- e. A "Single Central Record" of recruitment checks and a training log will be maintained by the DSL and / or their deputy.

4. Recruitment process

- a. Prior to appointment, all staff and volunteers will be required to submit an application form, ([see appendix 7 SG-001](#)) which includes a self-declaration of fitness and suitability for the role. Where necessary and appropriate (e.g., lack of literacy skills, English as a second language etc) support can be provided for completion of the forms.

Paid staff positions.

Note: the appointment of staff is the responsibility of the trustees, who may delegate the lead responsibility for any given appointment to one of more of their number .

Prior to appointment all paid staff will be required to attend a formal interview, regardless of whether a competitive process is in operation.

- b. Prior to appointment of staff, references will be sought including, where possible, a reference from the current or previous employer.
- c. Prior to appointment the applicant's identity and right to work in the UK must be verified.
- d. Upon commencement of their position, all staff will be required to complete a formal induction process as outlined in their role description and including any matters identified during the recruitment process.
- e. The Single Central Record, training Log and Personnel file will be updated as appropriate throughout the process.

Volunteer positions.

Note: the appointment of volunteers for teaching / ministry roles is the responsibility of the Elders, who may delegate the lead responsibility for any given appointment to one of more of their number. The appointment to practical roles is the responsibility of the deacons who may delegate the lead responsibility for any given appointment to one or more of their number or to one or more of the Elders or to other competent people.

- f. Prior to appointment, all volunteers will be required to attend a formal discussion to ensure their suitability and clarity of understanding of the role and its requirements.
- g. Prior to appointment, references will be sought. Where an appropriate reference was obtained at the time of application for formal church membership, this may be used, and internal references are acceptable.
- h. Following appointment, volunteers will be required to complete a formal induction process as defined in the role description.
- i. The Single Central Record, training Log and Personal File will be updated as appropriate throughout the process.

5. DBS Checks

- a. Following appointment and prior to commencement of the role, staff and volunteers involved in regulated activity will be required to complete a DBS check.
- b. Under normal circumstances, the individual will not commence their role until the result of the DBS check has been received.
- c. Under exceptional circumstances and where it is necessary for the person to commence prior to receipt of the DBS check result, a formal risk assessment will be completed by the DSL or their deputy and signed off by the Safeguarding Trustee. The person will not be permitted to have unsupervised access to children and must be supervised by someone who is DBS checked. In this context, they will be treated as a "visitor" until the DBS check is received. (see section 11d)

- d. A formal agreement that outlines the duties that are permitted, and all measures implemented to prevent the individual having unsupervised access to vulnerable people will be drawn up and signed by the appointee and the DSL or the Safeguarding Trustee. A copy of the agreement will be provided to the individual's Team Leader who is providing supervision.
- e. Once formal notification of a clear DBS check has been received, the Single Central Record will be updated with the relevant information.
- f. HBEFC will keep a record of the documents (not the originals) used to validate each identity for a minimum of 2 years. This is to aid fraud investigation work carried out by DBS.
- g. The Disclosure and Barring Service may ask for records of documents checked as part of ID verification as part of this process. Documents associated with applications up to 3 months old will also be requested as part of DBS routine compliance activity. Documents can be recorded as copies of physical documents or PDF evidence of an eVisa. If it is not possible to keep copies HBEFC will record the information on the single central record.

6. Blemished DBS Checks

- a. The applicant will be asked to present the DBS certificate to the Lead Recruiter (the DSL).
- b. The applicant may, if they wish to, withdraw their application.
- c. If the application is withdrawn, consideration will be given to whether this required the triggering of the procedure for the "Management of ex-offenders or those who pose an actual or potential risk to others; particularly to vulnerable people" ([see section E 16](#)).
- d. If the applicant self-declared the blemish and it has been discussed previously, the recruiter will check to ensure that the detail provided in the self-disclosure is consistent with the information on the DBS certificate.
- e. If the applicant did not self-disclose, an open conversation will explore the circumstances of the blemish, any implications or risks that need to be managed, the reason for the non-disclosure, and any other relevant factors that need to be considered.
The failure to disclose does not automatically either justify or contradict a negative inference. Negative inferences can be drawn if justifiable. Any such negative inference will be discussed as part of the open conversation.
- f. Whether the discussion arises from self-disclosure or examination of the certificate, a formal assessment will be conducted to ascertain the applicant's suitability for the role by the DSL and / or the Safeguarding Trustee, and the outcome will be recorded in the personal file.
- g. Advice can be sought from Christian Safeguarding Services if required.
- h. The applicant will be given every opportunity to provide input to the assessment and the outcome will be explained to them.
- i. A blemished DBS check does not necessarily prevent the individual from engaging in regulated activity. The risk assessment may conclude:
 - i. That the individual is unsuitable for the role.
 - ii. That further investigation is required.
 - iii. That the person is suitable for the role with restrictions.
 - iv. That the blemish does not indicate unsuitability.
- j. If the risk assessment concludes that the individual is unsuitable for the role, consideration will be given to:
 - i. Whether there are other roles for which the individual would be suitable.
 - ii. Whether the "Management of ex-offenders or those who pose an actual or potential risk to others; particularly to vulnerable people" ([see section E 16 of this policy](#)) process needs to be triggered.

- k. Once the details of the certificate have been recorded in the Single Central Record, the certificate will be returned to the applicant and no copies will be retained.

7. Probationary / settling in periods.

The precise nature and expectations of probationary / settling in periods will vary from role to role as described in the role description, however, they are intended to be supportive of the volunteer / employee and to provide a framework that provides accountability to both the individual and the organisation. Probationary periods will not be used for punitive purposes.

- a. All staff and volunteers will be subject to a probationary/settling in period.
- b. Prior to commencement of the role, a clear statement of the criteria for successful completion of the probationary period will be provided.
- c. Regular support, guidance and review will be provided throughout the probationary period and the outcome (passed, extended, failed) will be communicated to the employee or volunteer prior to the end of the probationary period and records will be retained of all discussions.

8. Ongoing support and supervision

- a. All staff and volunteers will receive proportionate supervision and pastoral care. Supervision will include both personal wellbeing and performance management.
- b. Where DBS checks are required, these will be updated at least every three years.
- c. If the individual is on the Update Service, this will be used rather than requesting a new DBS

9. Training

- a. All staff and volunteers in roles that involve regulated activity or those who manage such staff will be required to attend regular safeguarding training.
- b. Trustees will receive initial training. While there is no legal requirement for formal update training, the trustees will ensure that they are competent in their roles and that their knowledge of compliance with legislation and Charity Commission guidance is up to date.
- c. Church leaders will refresh their training every three years.
- d. Volunteers and staff involved in working with children, young people, or adults at risk of abuse are required to update their training at least every three years.
- e. The Designated Safeguarding Lead and the Deputy DSL are required to attend formal update training at least every two years.
- f. All staff, volunteers and trustees will undergo some informal update activity annually.
- g. Training should include themes on domestic abuse and trauma and the impact on victims including children and Prevent awareness.
- h. A training log will be maintained by the DSL / Deputy DSL.

10. Young Volunteers

There may be occasions when a teenager (17 years and under) wants to volunteer at the church. Where this occurs, because they are legally defined as children, we have a responsibility to safeguard them. Therefore, we will implement the following procedures to safeguard any young volunteers:

- a. All young volunteers will go through the recruitment process and undertake training and induction. As part of this we will provide them with a young volunteer role description and person specification.
- b. If the role involves regulated activity, volunteers aged 16 and 17 years old will be required to have a DBS check. If a volunteer is under 16 years old, a DBS check cannot be conducted. In these situations, a risk assessment will be completed in lieu of a DBS check.

- c. For all young volunteers, a risk assessment will be conducted to identify any potential safeguarding issues that might occur with the tasks that young people are asked to undertake. These include:
 - the potential risks for exploitation of the young volunteers
 - the possible emotional impact of tasks
- d. We will provide a young volunteer with a Code of Conduct to reflect their role and their age.
- e. We will allocate an experienced adult leader to be their point of contact for support and supervision during the activity they are volunteering for.
- f. We will never leave a young leader solely in charge of under 18s.
- g. We will ensure all young volunteers understand their safeguarding responsibilities, know what it is we expect from them and what steps they should take if a safeguarding matter arises.
- h. We will make it clear to young volunteers that by volunteering with under 18s they are in a position of leadership and a position of trust and the implications of this both in when they are volunteering at church and outside of church.
- i. We require signed consent from the young volunteer's parent's / carers for the young person to volunteer. Their parents will be provided with a role description so they understand what will be asked of their child.
- j. Young volunteers will not be placed in roles where they would be leading their peers (for example, a 17-year-old leader wouldn't be leading a group of 16-year-olds). We would endeavour to have a minimum of a 4-year age gap between any young leader and those they are leading.

11. Ensuring a safe and healthy environment

HBEFC fully recognises that there are many factors that impact on and contribute to the safety of the environment for everyone; some of these being procedural and others cultural. Here we describe only the procedural aspects.

A. Health and Safety

Please refer to our separate Health and Safety Policy.

B. Awareness raising

Herne Bay Evangelical Free Church recognises that any member of our church community could discover or receive a disclosure of abuse, and therefore all members need a basic awareness and competence, regardless of whether they engage directly in ministry to children, young people, or vulnerable adults. We will raise awareness by ensuring that:

- i. Information about our policies, procedures and codes of conduct are publicly available and promoted by our leaders.
- ii. Details of our safeguarding team are prominently displayed.
- iii. We set clear expectations of conduct and that clear processes for identifying, challenging, investigating, and dealing with inappropriate conduct are implemented.
- iv. We implement and promote clear and transparent processes for the raising of concerns or complaints, welcoming these as opportunities to learn and improve.

C. Ministry to children and / or young people

When engaging in ministry to children and / or young people that involves those acting for the church to assume responsibility for minors we will:

- i. Ensure that registers of children attending, and leaders present are maintained and retained in line with our data retention policy.

- ii. Ensure that those involved in such ministries have been appointed in accordance with our Safe Recruitment procedures.
- iii. Ensure that consent is obtained for their attendance at the group and that contact details and information about any additional or specific needs are recorded.
- iv. Ensure that appropriate child: adult ratios are maintained in line with guidance from the NSPCC and as indicated within any activity risk assessment. A minimum of 2 adults must be present in any group. The minimum ratios are:
 - 0 - 2 years - one adult to three children
 - 2 - 3 years - one adult to four children
 - 4 - 8 years - one adult to six children
 - 9 - 12 years - one adult to eight children
 - 13 - 18 years - one adult to ten children
- v. In situations where an adult is present with a specific role to support a particular child, the additional “carer” can be counted as one of the minimum of 2 workers, if they will be present throughout the group, however, since their role is to support one child, they will not count towards the ratios listed above.
- vi. Ensure that appropriate accident / incident reporting is in place and that any accidents or incidents are reported in line with the church’s Health and Safety Procedures. All accidents and incidents must also be reported to parents / carers in a timely manner.
- vii. Ensure that appropriate order and discipline are maintained.
- viii. Ensure that children are encouraged and empowered to raise any concerns that they may have with leaders or their parents as appropriate.

D. Visitors to children’s or youth groups

From time to time, adults who are not part of Herne Bay Evangelical Free Church’s children or youth ministry teams may be present. For example, a parent may wish to stay with a child for a specific purpose, or a visiting speaker may attend the group.

- i. Visitors must be supervised at all times by someone who has a DBS check in place.
- ii. Visitors must be made aware of expected standards of conduct during the time they are visiting the group.
- iii. Visitors must be made aware of what they need to do if they become aware of a concern.
- iv. If visitors attend a group on behalf of another organisation (e.g. a worker from a youth organisation or someone who serves as a youth leader in another church etc.) the ‘employing organisation’ will be asked whether the visitor has a current DBS check, whether their safeguarding training is up to date and whether there are any safeguarding concerns or allegations against the individual. If written confirmation is provided and the visitor identity is confirmed, the visitor will be classed as a DBS checked worker rather than as a visitor.
- v. If a visitor notifies the church that they have a current DBS check which is registered with the update service, following a check of the original certificate and the update service, the individual will be classed as a DBS checked worker rather than as a visitor.

E. All age group meetings

When young people are present at meetings that are primarily aimed at adults and participating in that meeting in their own right:

- i. During these times, children remain the responsibility of their parents who are responsible for their safety and care.
- ii. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way.

When young people are present at meetings that are primarily aimed at adults and participating in that meeting in their own right (and their parents are not present):

- iii. Although there are not specific procedures for such meetings, the normal principles of safeguarding will apply.
- iv. If the young person is not believed to be competent to consent to attendance, consent will be sought from their parents / carers.
- v. If the young person is believed to be competent to consent to attendance, they will be encouraged to be open and transparent with their parents / carers and consent will be sought for the church to contact the parents and establish open communication and transparency.
- vi. Leaders of the church or of the meeting in question will be vigilant to ensure that the young person is adequately protected.
- vii. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way.

F. Ministry to Adults at Risk of Abuse or Adults with care and support needs

- i. If the individual is not believed to be competent to consent to attendance, consent will be sought from their carer.
- ii. If the individual is believed to be competent to consent to attendance, they will be encouraged to be open and transparent with their carers, and consent will be sought for the church to contact them with a view to establishing open communication and transparency.
- iii. Leaders of the church or of the meeting in question will be vigilant to ensure that the individual is adequately protected.
- iv. Any concerns or support needs identified will be recorded and reported to the DSL in the usual way.

G. General provisions

- i. The church will ensure that information relating to safeguarding, including contact details and other relevant information is prominently displayed in the building and online.
- ii. Leaders will promote the need for every member to be vigilant to safeguarding concerns through the processes, teaching, and culture of the church and by personal example.
- iii. A clear process for raising concerns will be available on the church website.

12. Responding to safeguarding concerns or disclosures

a. Managing immediate risk

- i. Upon identification of a concern or receipt of a disclosure, the worker involved should make an assessment as to whether any immediate action is necessary to protect the individual.
- ii. The worker may seek advice from the team leader or from the DSL, however, the seeking of advice should not unnecessarily delay or prevent the protective action or place the individual at risk of further or increased harm.
- iii. In such urgent situations and if the DSL cannot be immediately contacted, the worker should contact either the police on 999 or Social Care (see contact details in Appendix 2) to obtain support. Under such circumstances, the DSL should be notified at the earliest possible opportunity.

- b. **Reporting concerns to the Designated Safeguarding Lead**
- i. Once it has been established that the individual is not, or is no longer in imminent danger, the concern will be reported to the DSL using the Concerns Reporting Form ([see appendix 7 SG-003](#)).
 - ii. The concerns will be discussed with the DSL at the earliest opportunity, to ensure clarity of understanding.
- c. **Managing the risks: the role of the DSL**
- i. In discussion with the worker reporting the concern, the DSL will review any immediate actions taken and will be responsible for follow-up or further action that may be required.
 - ii. Upon receipt of the completed form, the DSL will establish a “Confidential File” in relation to the person at risk.
 - iii. A Chronology ([See appendix 7 SG-004](#)) will be established and inserted at the front of the confidential file.
 - iv. The confidential file will be updated with any further discussions or actions, including any advice sought or referrals made and updating will continue on an ongoing basis.
 - v. The DSL will confirm to the person raising the concern that the matter has been actioned. The DSL will not provide any unnecessary information. Information is only shared on a “need to know” basis.
 - vi. Where the concern meets the statutory threshold, the DSL will notify the parent or carer of the individual concerned (or the individual themselves if they are a competent adult) that a referral is being made to Social Care.
 - vii. Information will not be shared with the parent / carer in situations where:
 - To do so would place a child at increased risk of harm or abuse.
 - To do so would place an adult at increased risk of harm or abuse.
 - viii. The referral will be made to the appropriate Social Care service ([See appendix 2 for contact details](#)).
 - ix. If the referral has not been acknowledged within 2 working days, the DSL will follow up with Social Care (or other agencies as required).
 - x. The DSL will work with the Local Authority and other partners on behalf of the church to ensure that we fully participate in the safeguarding process.
 - xi. All conversations, correspondence, and documentation etc will be placed into the confidential file and the “Record of action” and Chronology will be maintained on an ongoing basis.
 - xii. Confidential files will be stored in a secure folder, only accessible to the DSL, the Deputy DSL and the Safeguarding Trustee on a password protected cloud-based drive and the hard copy stored in a secure locked filing cabinet.
 - xiii. The DSL / Deputy DSL / Safeguarding Trustee will share information as necessary with other individuals in the church to facilitate effective safeguarding.

13. Sub-threshold concerns and Early Help

- a. Where concerns are sub-threshold and do not meet the requirements for a statutory referral, the DSL will keep a written record of the concerns.
- b. Staff and volunteers who work with under 18s will be alert to identifying those children who would benefit from the local Early Help process. We will work with our local safeguarding partners to put in place support to address identified or emerging problems and needs and improve a family’s resilience and outcomes or reduces the risk of escalation.

- c. If a child has a Team Around the Family in place through the Early Help process, if invited by the Lead Professional to do so, the DSL will join the Team Around the Family.

14. Disclosure of historic child abuse by an adult

- a. If an adult makes a disclosure of historic abuse during their childhood, it is the decision of the individual whether or not they wish to report the historic abuse.
- b. If the adult wants to report it, they must make their report to the Police. If they choose to report the abuse, we will offer support to the individual in doing this.
- c. If the adult does not want to report the abuse but the alleged perpetrator is currently in a position of trust, consideration of the potential risks will be assessed, and appropriate action will be taken. The DSL can take advice from CSS or statutory services in this situation.

15. Allegations against or concerns about staff and volunteers

Herne Bay Evangelical Free Church will always take allegations against our staff or volunteers seriously; ensuring that they are investigated proportionately, via a transparent and accountable process that expedites the matter in a timely manner; recognising both our responsibility to keep vulnerable people safe, and our responsibility to support the person accused throughout the process.

If an allegation is raised during a church activity, for example a youth group meeting, if appropriate, the team leader should take any immediate action to ensure the safety of others, for example, call the emergency services.

- a. Allegations against staff or volunteers within the church should be reported to the DSL on 07935471286 or by emailing **safeguarding@hbefc.org.uk**
- b. If the allegation is against the safeguarding trustee, it should be reported to one of the other Elders or the DSL.
- c. Full details of the allegation will be recorded.
- d. The trustees will nominate an investigating officer (on a case-by-case basis) who will assess whether any immediate action is required to ensure the safety of everyone involved.
- e. If so, care will be taken not to compromise the gathering or preservation of evidence.
- f. If it is necessary to notify the individual at this stage, details of the allegation will not be divulged.
- g. Support must be offered to the subject of the allegation as well as any potential victims.
- h. At the earliest opportunity, the LADO (Local Authority Designated Officer)- see Appendix 2 for contact details should be consulted. If the LADO cannot be contacted due to working hours, initial advice can be sought from Christian Safeguarding Services (CSS).
- i. If the allegation meets the threshold for LADO, the church's investigating officer will work with LADO to ensure that the allegation is thoroughly investigated, and all issues raised are addressed.
- j. If the allegation does not meet the threshold for LADO, the investigating officer will consult with CSS, who will provide independent support and advice to ensure transparency.
- k. Thorough records of all aspects of the handling of the allegation will be retained throughout the process.
- l. These records will be held confidentially in a secure folder in a secure locked filing cabinet.
- m. The investigating officer will seek and follow specialist advice throughout the process as required.
- n. Where the concern is of a low-level nature, our Low-Level Concerns process will be followed (Appendix 4)

16. Management of ex-offenders or those who pose an actual or potential risk to others, particularly to vulnerable people.

As a church, we believe in the power of God to forgive and transform individuals. We also believe that every individual is valuable to God and should be protected; particularly those who are vulnerable.

- a. Where the church becomes aware that an individual is an ex-offender or that they may pose a risk to vulnerable people, the church leaders will enter into an open and frank discourse with that individual to understand the context and the risks. If the individual has an allocated offending officer e.g. probation / police etc., the church leaders will seek to work in partnership with those statutory services supporting the individual where this is appropriate.
- b. The leaders will assess the risk posed by the individual and a formal risk assessment will be formulated.
- c. A formal agreement with the individual will be drawn up and will be signed by both the church leaders. The agreement will include:
 - i. The church's commitments to the individual who poses the risk.
 - ii. The steps the church will take to support the individual while simultaneously protecting everyone in the church community.
 - iii. The restrictions and conditions that will be applied to the individual's involvement in the life of the church.
 - iv. The consequences of failure to comply with the agreement.
 - v. When and how the risk assessment and formal contract will be reviewed.
- d. All decisions and agreements will be formally recorded and securely stored.
- e. The individual who poses a risk will be fully involved in the planning process and information will only be shared with church members by the leaders either:

With the agreement of the individual who poses a risk.

or

Where information needs to be shared to protect vulnerable people and then, only the minimum information that is essential will be shared and the individual will be informed in advance what information will be shared.

- f. If the individual chooses to leave the church to avoid the management of the risk and starts to attend elsewhere, the church leaders will take specialist advice either from CSS or from statutory agencies as to whether this information should be passed on.
- g. All records of risk assessments and formal agreements will be stored in the secure locked filing cabinet.

17. Complaints and concerns

- a. Any complaints that have a safeguarding element or implication will be discussed with the Designated Safeguarding Lead and the Safeguarding Trustee who will ensure that the safeguarding aspects are identified and managed in a proportionate way.
- b. The overall process will be as per the **HBEFC Complaints Policy and Procedures** published in May 2026.

Section F: Codes of Conduct

Code of conduct for staff and volunteers working with children or young people

Those working with children and young people will:

- Ensure that they understand the policies, procedures, systems, guidelines, and risk assessments etc that are provided and that they are implemented.
- Attend safeguarding training on the frequency stipulated in this policy.
- Work in a transparent and responsible manner that ensures that they are accountable to the church leaders and that they are open to discussion with and challenge from parents.
- Ensure as representatives of the church, their behaviour, speech and attitudes are consistent with the biblical teachings and the church's statement of faith.
- Ensure health and safety procedures are followed.
- Ensure that their conduct embraces their responsibility for the safety of the children in their care.
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about adults who may pose a risk to children.
- Refrain from any misuse of their power or authority as adults and leaders within the group.
- Only take responsibility for children if they are physically and mentally fit and able to do so.
- Treat them with respect and dignity.
- Treat them in an age-appropriate way that recognises their developmental stage and ability.
- Provide them with appropriate levels of choice.
- Treat them as individuals.
- Respect their views and wishes.
- Promote and ensure appropriate behaviour towards one another and leaders in their group.
- Ensure that appropriate professional boundaries are maintained.
- Refrain from inappropriate physical play (e.g. Rough and tumble games that involve physical contact.) Remain aware of risks due to differences in physical size or strength and the possible appearance of sexual motivation.
- Ensure that age-appropriate boundaries are clearly explained and consistently implemented in accordance with this policy.
- Ensure that any age-appropriate physical contact is child led.
- Ensure that physical intervention is only used as a last resort to ensure the safety of an individual child or the group.

- Refrain from any physical chastisement.
- Refrain from making any unofficial, private or one-to-one connections with under 18s on social media, at all times abiding by the church's safeguarding guidelines in this area.
- Will not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory (etc) language or behaviour with them.
- Act with fairness and treat children equitably, avoiding discrimination or favouritism.
- Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding or misrepresentation.
- Support the participation of the children and young people (and their parents / carers where appropriate) in the planning of support or other decisions that affect them

Code of conduct for staff and volunteers working with Adults

Those working with vulnerable adults including adults at risk of abuse will:

- Ensure that they understand the policies, procedures, systems, guidelines, and risk assessments etc that are provided and that they are implemented.
- Attend safeguarding training on the frequency stipulated in this policy.
- Work in a transparent and responsible manner that ensures that they are accountable to the church leaders.
- Ensure as representatives of the church, their behaviour, speech and attitudes are consistent with the biblical teachings and the church's statement of faith.
- Ensure that their conduct embraces their responsibility for the safety of those with whom they are working.
- Ensure health and safety procedures are followed.
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about people who may pose a risk to them.
- Refrain from any abuse of their power or position and will always seek to act in the best interest of the individual.
- Only engage in activity for which they are physically and mentally fit.
- Treat everybody with respect and dignity, particularly the vulnerable adults.
- Ensure that support is client led and that their views, wishes, and choices are respected.
- Treat them as individuals.
- Promote and seek to ensure appropriate behaviour towards one another.
- Ensure that appropriate professional boundaries are maintained.
- If working in groups, seek to ensure that necessary behavioural and interpersonal boundaries are clearly explained and consistently implemented.
- Ensure that any physical contact is client led.
- Ensure that proportionate physical intervention is only used as a last resort to ensure the safety of an individual or the group.
- Will not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory (etc) language or behaviour with them.
- Act with fairness and treat each person equitably, avoiding discrimination or favouritism.
- Seek to avoid any language or behaviour or adopting any attitude that could reasonably lead to misunderstanding or misrepresentation
- Support the participation of the vulnerable person (and their carers where appropriate) in the planning of support or other decisions that affect them.

Code of conduct for staff and volunteers providing pastoral care

(Please note: this code of conduct is not intended to cover disciplinary issues, although the broad principles would still apply)

Those involved in providing pastoral care will:

- Ensure that support provided is led by the person receiving the support.
- Ensure that the dignity and wishes of the individual are always respected.
- Ensure as representatives of the church, their behaviour, speech and attitudes are consistent with the biblical teachings and the church's statement of faith.
- When delivering challenging or difficult messages, will do so in a respectful, compassionate, and gentle way that is in line with their best interests (including their emotional and spiritual wellbeing).
- Will seek to ensure that the individual's right to question or ignore any advice or suggestions is fully understood.
- Attend safeguarding training on the frequency stipulated in this policy.
- Work in a transparent and responsible manner that ensures that they are accountable to the church leaders.
- Maintain a state of vigilance to identify and report any safeguarding concerns, including concerns about people who may pose a risk to them.
- Refrain from any misuse of their power or position and will always seek to act in the best interest of the individual.
- Only engage in activity for which they are physically and mentally fit.
- Ensure that appropriate professional boundaries are maintained.
- Ensure that any physical contact is client led.
- Ensure that proportionate physical intervention is only used as a last resort to ensure the safety of an individual or the group.
- Will not engage in any sexualised, aggressive, humiliating, demeaning or discriminatory (etc) language or behaviour with them, including behaviour that is initiated by the person receiving the support.
- Act with fairness and treat each person equitably, avoiding discrimination or favouritism.
- Seek to avoid any language or behaviour or adopting any attitude that could lead to misunderstanding or misinterpretation.

Section G: Appendices

Appendix 1: Safeguarding responsibilities

Governance of safeguarding

The trustees will ensure that they provide leadership of safeguarding across the organisation by:

- Ensuring that legally compliant policies, procedures, codes of conduct and systems are implemented.
- Ensuring that a safeguarding trustee is appointed to act as a link between the DSL / Deputy DSL and the trustees.
- Ensuring that a suitably skilled and knowledgeable Safeguarding Officer and at least one deputy is appointed, supported, and resourced.
- Providing accountability to those responsible for various aspects of safeguarding
- Reviewing the safeguarding arrangements to ensure that an effective and proportionate approach is thoroughly implemented and consistently enacted across the church.
- Ensuring that the Safeguarding Lead and deputy provide regular updates to the Trustees.
- Ensuring that Charity commission requirements, including the responsibility to report any serious incidents are fully met.
- Ensuring that clear and transparent processes for raising complaints, concerns or allegations or other expressions of dissatisfaction are in place.

Leadership and management of safeguarding

The Designated Safeguarding Lead and their deputy, will ensure that:

- The Safeguarding Policy is regularly reviewed, updated and any changes signed off by the trustees.
- Safeguarding concerns are managed in a timely and proportionate manner, including making referrals to statutory agencies as required, working with partner agencies such as the Local Authority and the Police and the maintenance of accurate records and systems.
- Lead on the implementation of the safeguarding policies and procedures
- Ensuring that those engaged in ministry on behalf of HBEFC are provided with proportionate and appropriate training and that they are competent to discharge their safeguarding responsibilities.
- Ensuring that regular reports are provided to the trustees and that any urgent issues are communicated to the chair of trustees in a timely manner.
- Raising awareness of safeguarding and promoting its importance across the organisation

Individual responsibilities

Everyone working on behalf of HBEFC is required to:

- Ensure they understand and act in accordance with the policies, procedures, risk assessments and codes of conduct provided
- Adhere to local legislation, guidance, and procedures.
- Ensure that they remain vigilant to the risks of harm.

Appendix 2: Key safeguarding contacts

<h3>Key Safeguarding Contacts</h3>	
<p>Organisational</p> <p>Phone: 07749 928783</p> <p>E-mail: safeguarding@hbefc.org.uk</p> <p>Leadership</p> <p>Safeguarding Trustee Simon Buss</p> <p>Designated Safeguarding Lead Doff Davey</p> <p>Deputy Designated Safeguarding Lead Sue Peeling</p> <p>Our policies and other useful information about safeguarding can be found at: https://www.hbefc.org.uk</p> <p>The roles and responsibilities of those involved in safeguarding can be found in Appendix 1</p>	<p>Statutory services</p> <p>Local Authority details Kent County Council</p> <p>Safeguarding children 03000 41 11 11</p> <p>Emergency out-of-hours: 03000 41 91 91</p> <p>Email social.services@kent.gov.uk <i>(Please remember that email is NOT secure so confidential or sensitive data should not be included)</i></p> <p>Local interagency referral forms can be found here:</p> <p>Allegations against staff or volunteers should be reported to kentchildrenslado@kent.gov.uk <i>(Please remember that email is NOT secure so confidential or sensitive data should not be included)</i></p> <p>Safeguarding Children Partnership</p> <p>Phone: Website: kscmp.org.uk E-mail: kscmp@kent.gov.uk</p> <p>Safeguarding Adults</p> <p>Report concerns to Adult Social Care Phone: 03000 41 61 61</p> <p>E-mail: social.services@kent.gov.uk <i>(Please remember that email is NOT secure so confidential or sensitive data should not be included)</i></p> <p>Safeguarding Adults Board kmsab.org.uk</p>

Appendix 3: Basis of the policies and procedures and the legal framework

HBEFC Internal framework

- Our statement of faith
 - This policy reflects the organisation's fundamental biblical beliefs and should be read in conjunction with the statement of faith.
- Our governing documents (e.g., constitution / Memorandum and Articles of Association etc)

National guidance

Safeguarding children

- National legislation and guidance (Safeguarding Children)
 - Children Acts (1989 & 2004)
 - Children and Families Act (2014)
 - Children and Social Work Act (2017)
 - Working together to safeguard children (2023)
 - What to do if you're worried a child is being abused: advice for practitioners (Department for Education, (2015)
 - Protection of Children Act (1999)
 - Safeguarding vulnerable groups act (2006)
 - Protection of freedoms Act (2012)
 - Disqualification under the childcare act 2006 (2018 amended)
 - Prevent duty guidance (2023)
 - Sexual offences Act (2003)
 - Children's Social Care National Framework (2023)
 - Counter-Terrorism and Border Security Act (2019)
 - Prevent Duty Guidance (2023)
 - Police, Crime, Sentencing and Courts Act (2022)
 - Safeguarding and Child Protection Standards for the Voluntary and Community Sector (2024) NSPCC

The policy also takes account of the principles outlined in:

- After School Clubs, Community Activities and Tuition – Safeguarding Guidance for Providers (2023)
- Keeping Children Safe in Education (2025)
- Multi-agency Statutory Guidance on Female Genital Mutilation (2020)
- Domestic Abuse Act (2021)

Safeguarding adults

- National legislation and guidance
 - The Care Act (2014)
 - Human Rights Acts (1998)
 - Care Standards Act (2000)
 - Mental Capacity Act 2005 and Mental Capacity (Amendment) Act (2019)
 - Deprivation of Liberty Safeguards (2007)
 - Sexual Offences Act (2003)

- Police and Criminal Evidence Act (1984) and Fraud Act (2006)
- Public Interest Disclosure Act (1998)
- Health and Social Care Act (2008)
- Domestic Abuse Act (2021)
- Disclosure and Barring Service (DBS) Guidance
- Multi-Agency Public Protection Arrangements (MAPPA)
- Multi-Agency Risk Assessment Conference (MARAC)
-

Local guidance

- Local Safeguarding Children's Partnerships
- Local Authority guidance (children & adult)
- Local Safeguarding Adults Board procedures (in some areas known as Safeguarding Adult's Partnerships)

Appendix 4: Low-level Concerns

As part of our whole church approach to safeguarding, we will ensure that we promote an open and transparent culture in which all concerns about all adults working or volunteering with under 18s or adults at risk are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working or volunteering may have acted in a way that:

- is inconsistent with the code of conduct, including inappropriate conduct outside of church, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or a volunteer.

Examples of such low-level behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to church policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door or via any form of technology
- humiliating children / adult

We recognise that such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Ensuring they are dealt with effectively should also protect those working / volunteering at Herne Bay Evangelical Free Church from becoming the subject of potential false low-level concerns or misunderstandings.

Anyone is free to share a low-level concern with the DSL.

All low-level concerns will be recorded. Records will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

The records of low-level concerns will be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the DSL will decide on a course of action, either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

Appendix 5: Safeguarding guidelines for communicating with under 18s via electronic devices and livestreaming meetings where vulnerable people are present

The purpose of our safeguarding guidelines in relation to these online activities is to ensure the safety and wellbeing of children and young people when using online platforms related to our official church activities.

These guidelines apply to all staff, volunteers, children and young people and anyone involved in Herne Bay Evangelical Free Church activities.

We recognise that many under 18s have access to mobile devices and these present opportunities for easier communication. However, we also recognise the risks associated with online activity for under 18s including (but not limited to):

- unwanted contact
- pressure to respond to messages
- live location features
- inappropriate content
- cyber bullying
- forming inappropriate relationships
- grooming

We will keep under 18s safe by:

- Ensuring our DSL oversees all aspects of online safety for under 18s.
- Provide code of conducts to our staff and volunteers who work with under 18s outlining our expectations of how they behave online with under 18s.
- Examining and risk assessing any social media platforms, messaging apps and new technologies before they are used within our church.

WhatsApp (or other messaging apps) guidelines

We recognise that messaging apps present an opportunity for young people to be in communication with one another, for example, our Church youth group. Where a church group has a WhatsApp group, we will take steps to mitigate risk of harm.

The following steps will be put in place:

- Explicit signed parental consent will be sought before inviting any under 18s to join a WhatsApp group.
- We will develop a Code of Conduct for the young people within a Church WhatsApp group which will outline how we expect them to behave within the group and the consequences of not adhering to the Code of Conduct. Parents / carers will also be provided a copy of the Code of Conduct.
- We will also develop a Code of Conduct for the adult leaders within a WhatsApp group.
- There will be a minimum of two adult leaders on the WhatsApp group to oversee and moderate the group. These leaders must have a current DBS check in place.
- Parents who wish to be, can be added to the WhatsApp group.
- The youth leaders will continue to comply with GDPR and data protection standards.

- WhatsApp does not allow under 13s to use the App; we will never invite a child younger than 13 to join a group. If this means that younger members of the youth group are excluded, we will look at other communication options to ensure no young person is excluded.
- Whilst private messaging between leaders and young people is not encouraged, if private messages take place relating to official church activities, the leader must keep copies of all messages and be willing and ready to share when asked to do so.
- Youth leaders will make no direct, private contact with any child under the age of 13 years. If contact is necessary, the leader must communicate with the parent.
- If the youth leader needs to send a private message to a young person between 13-16 years old, a parent / carer must be included in messages.
- Where a member of the youth group is aged 17-18 years old (& the 18-year-old is still in full time education) explicit parental consent is required before the leader makes any direct contact with the young person.
- All volunteer / staff leaders will only make contact under 18s for the purposes of their church role.

Social Media Accounts

Where youth leaders have a personal social media account (such as Facebook, Instagram etc.) they must not request or accept a friend request from anyone under the age of 18 years.

If there is already a pre-existing relationship with the under 18, e.g. a family connection, the DSL must be informed of this and a record of this will be noted.

We advise our youth work leaders to have their personal account's privacy settings set as high as they can be so that a young person cannot access their photos, posts etc.

Online Video meetings (e.g. Zoom) with under 18s

If our youth work holds a meeting via a video call (for example Zoom) we will ensure there is a minimum of two adult leaders present throughout the call.

Those taking part in the video call will always wear appropriate clothing and be in appropriate locations for a video call.

We will develop Code of Conducts for participants (young people and leaders).

Explicit consent from parents will be sought before a young person is invited to attend a video meeting.

Our leaders will always use the church accounts, and not personal accounts, for video calling platforms.

Live Streaming of meetings

We recognise that live streaming and / or uploading videos of meetings (e.g. YouTube) presents unique safeguarding risks and considerations.

We recognise that by filming and / or posting video content online this may put individuals at risk. Examples include:

- A survivor of domestic abuse may need to be protected from another person and information about their location may be highly sensitive.
- Children may be present who are subject to legal child protection measures and who are potentially fleeing violence or are being 'searched for' by others.
- Children who are being fostered or adopted may be being 'searched' by birth families.

We will take the following steps to protect the identity of people who may be at risk when meetings are live streamed / recorded:

- Explicit and signed consent will be sought where possible from church members in relation to filming.
- Where we have visitors, we will always give a notice at the beginning of the meeting about filming. Signage will be clear in and around the entrance informing people the service is being livestreamed.

We will be clear what appears in the frame and, on the whole, we will not film the congregation. If there are times when the congregation may be filmed, clear instruction will be given before filming, clarifying which seating will be exempt from filming.

Appendix 6: Taking, Storing and using Images Policy

Herne Bay Evangelical Free Church is aware of the safeguarding risks around taking photos and videos. The purpose of this policy is to protect children where photographs or video are taken at church. Sharing photographs and films of our activities can help us celebrate the activities of the children and young people and provides a record of our activities.

We recognise that parents and carers have a right to decide whether images of their children are taken and how these will be used and stored. We also recognise that images and videos of children is classed as personal data and we comply with the [Information Commissioner's Office guidelines](#).

Herne Bay Evangelical Free Church will:

- Always seek explicit consent from parents/carers before taking a photo / video of a child and using the image. Parents / carers can withdraw their consent at any point.
- Always seek the explicit consent of the child where they are aged 11 years + (School Year 7 upwards) before taking a photo or video of them. The young person can withdraw their consent at any point.
- Always seek explicit consent from the parent / carer (and where age appropriate the child) if we wish to display an image in our church building where they feature on the photograph.
- Always outline how the images will be used and stored (and for how long) and if there are any possible risks associated with the sharing of an image.
- Never disclose any personal information about the child.
- Only use image of children in appropriate clothing, for example, not in swimwear at a swimming activity.
- Never take close up photographs of children.
- Only use church owned devices to take images of children for official purposes. The use of staff / volunteer's personal devices / cameras is prohibited.
- Only use images for a valid reason (referred to in data protection law as 'lawful bases')

We recognise that some children and / or their families may be more vulnerable, for example, a child who has come into the care of the Local Authority of a family fleeing domestic abuse. Extra care and precautions in relation to the use of images / video will be taken in these scenarios.

If anyone has a concern about the abuse or misuse of an image this must be reported to our DSL. (see contact details in Appendix 2)

We will never exclude a child from an activity because we do not have consent to take their photograph.

We will store photographs and videos of children securely, in accordance with data protection law.

Images will only be retained when there is a clear and agreed purpose for doing so. Images will be stored in a protected folder with restricted access and password protected. Images will be disposed of securely in line with the Data Protection Act 1998.

We will never store images of children on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

We do not permit staff to use any personal devices to take photos and recordings of children. Only cameras or devices belonging to the church are used.

Photography / filming by parents / carers for personal use

When parents or carers take photographs or film at our meetings or events and the images are for personal use, we will remind them (before the event) that photos taken during the event are not to be shared on social media or shared elsewhere.

When parents take photos or videos at a church event they will be reminded that under Data Protection Law they need to consider whether individuals in the photos or videos would reasonably expect the images to be used in this way. Data protection law states that extra care must be taken when using images of children, to ensure their interests are protected.

If parents become aware that images of their child have been posted online, they can request that they are removed. If they refuse or don't reply, the parent can submit a complaint to the Information Commissioner's Office.

Appendix 7: Standard Document Samples

SG_001	Application to volunteer
SG_002	Concerns reporting form
SG_003	Role description
SG_004	Confidential file chronology
SG_005	Confidential file record of conversations and actions
SG_006	Template report from DSL to trustees
SG_007	Complaints form [removed - refer to HBEFC Complaints Policy]
SG_008	Complaints log [removed - refer to HBEFC Complaints Policy]
SG_009	Registration and parent consent form for children's activities
SG_010	Volunteer reference form



HERNE BAY EVANGELICAL FREE CHURCH

64 Sunnyhill Road, Herne Bay, Kent, CT6 8LU | Registered Charity No. 1178886

Volunteer Application Form

[HBEFC_SG_001]

About You		
Full name	Address	
Phone number		
Mobile number		
E-mail address		
About the role		
Department /Group / ministry area	Role applied for	
Is the role subject to a DBS check?		
Children only	Adults only	Children and adults
Personal statement		
Please briefly describe your reasons for applying for this role and any appropriate experience in similar roles.		
Do you have any questions or concerns about the role, or your ability to fulfil it, that you would like to discuss with us?		
Please supply details of 2 people who can comment on your suitability for this role.		
Reference 1	Reference 2	
Name	Name	
Relationship to you or capacity in which you are known to them	Relationship to you or capacity in which you are known to them	

Address	Address	
Phone	Phone	
E-mail address	E-mail address	
Self-declaration		
	Yes	No
Do you have any criminal convictions that would affect your ability to perform this role?		
Is your state of physical, mental, emotional, and spiritual health adequate to fulfil this role?		
If the role involves working with children, young people, or vulnerable adults, are you, or have you ever been barred from such work?		
Have you ever been the subject of a safeguarding investigation, regardless of the outcome? (If yes, please be prepared to share any relevant details)		
Are you in agreement with the church's beliefs as outlined in the statement of faith?		
Do you agree to abide by the policies, procedures, codes of conduct, risk assessments etc that are relevant to this role?		
Is there anything that you wish to add or that you wish us to consider in relation to this self-declaration?		
I confirm that the information supplied in this form is accurate to the best of my knowledge.		
Signature:		
Date:		
For office use only: Form reference / volunteer reference as per Single Central Record.		



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Staff / Volunteer Role Description

[HBEFC_SG_002]

Role title:	
Responsible to:	
Role purpose:	
Role description:	
Person specification:	
Date last reviewed:	Reviewed by:



HERNE BAY EVANGELICAL FREE CHURCH

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Safeguarding Incident / Disclosure / Concern Reporting Form

[HBEFC_SG_003]

About this form and the person completing it			
Your name	Your phone number	Your mobile number	Your e-mail address
Are you reporting: <i>Please tick the appropriate box(es)</i>	An incident	A disclosure	A concern
Department /Group / ministry area			Date completed
About the person or people, we are concerned about or involved in the incident			
Their name(s)	Their Address and contact details	Their Date of birth	Name & contact details for parent / (where appropriate)
<i>Please insert more lines as required</i>			
Details of the incident / disclosure / concern			
<i>What happened / was said / have you noticed etc?</i>			
Context of the incident / disclosure / concern			
<i>Where / when / who else was present etc.</i>			
Date of incident / disclosure		Time of incident / disclosure	
Action taken to ensure immediate safety.			
Other action taken or advice sought.			
Signature			
For office use only: Form reference –			

Notes for completion

About this form and the person completing it

Please complete all sections

About the person or people, we are concerned about or involved in the incident.

When reporting a concern involving a child or young person, please complete all sections.

When reporting a concern about an adult, the parent / carer details may not be required. Where this is recorded, please include the relationship to the person involved. Please insert additional lines as required.

Details of the incident / disclosure / concern

Please include as much relevant detail as you can.

When reporting a disclosure, please quote the individual where possible. Please also comment on their body language or any other non-verbal communication that might be useful.

When drawing conclusions, please include the evidence that has led to that conclusion.

Context of the incident / disclosure / concern

Please include as much relevant detail as you can.

Action taken to ensure immediate safety.

Please provide details. If no action was required, please indicate by writing "None".

Other action taken or advice sought.

If any advice was sought, please provide details including who you spoke to, their contact details and what advice was given or action that was taken.

Signature

Please ensure that you sign the form.



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Record of Safeguarding Conversations and Actions

[HBEFC_SG_005]

Date of action / conversation	Document reference.
Description of record	
Information given.	
Advice received.	
Actions to take.	
Outcomes	
Recorded by	Date recorded



HERNE BAY EVANGELICAL FREE CHURCH

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Safeguarding Report to the Trustees and Officers

[HBEFC_SG_006]

Report from the Designated Safeguarding Lead and Deputy covering the period from	
Report completed by:	Date
Summary of safeguarding activity	
Number of concern / incident reports received in relation to children	
Number of concern / incident reports received in relation to adults	
Number of cases referred to Children's Social Care	
Number of cases referred to Adult Social Care	
Number of allegations received	
Number of allegations investigated by Local Authority	
Number of reportable incidents reported to charity commission	
Were there any common themes or issues in the reports submitted?	Yes / No
If so, what?	
Do you have any concerns about the effectiveness of the safeguarding arrangements that are in place?	Yes / No
If so, what?	
What training or informal update activity been completed this year?	
Any recommendations to or requests of the trustees?	

Declaration from Safeguarding Leads	Yes	No
Has the policy been reviewed for legal compliance and effectiveness? <i>(CSS can be consulted to check whether any significant changes have occurred)</i>		
Are DBS checks up to date for all staff and volunteers?		
Is the Single Central Record up to date?		
Is staff and volunteer training up to date?		
Is DSL training up to date?		
Is the training log up to date?		
Any other comments		



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Registration & Consent Form for Children's Clubs

[HBEFC_SG_009]

Please use a separate form for each child and complete using **BLOCK CAPITALS**

Child's Name: _____ Male / Female (Circle)

Date of Birth: _____ Age: ____ School Year: _____

Parent/Carer's name: _____

Address: _____

Phone no: _____

Mobile no: _____

Email address: _____

Emergency contact names and phone numbers (if parent/carers above not available)

Name 1: _____ Phone no: _____

Name 2: _____ Phone no: _____

Please indicate any **allergies, medical conditions**, instructions for their immediate treatment, or anything else we should know:

Name of GP practice (optional): _____

I give permission for photographs and video to be taken within the club for use at the club and future events. **YES / NO**

I give permission for mine and my child's details to be kept in church files for future contact **YES / NO**

I give permission for my child to have juice and snacks. **YES / NO**

Is the child to be collected by someone other than you? **YES / NO**

*(If YES please **tell us overleaf** who will normally collect the child **and** if anyone should NOT be allowed to take the child home.)*

I confirm that the above details are complete and correct to the best of my knowledge.

In the unlikely event of illness or accident, I give permission for appropriate first aid to be given. In an emergency, and if I cannot be contacted, I am willing for my child to be given hospital treatment, including anaesthetic if necessary. I understand that every effort will be made to contact me as soon as possible.

Signature of Parent/Carer: _____ Date: _____



HERNE BAY EVANGELICAL FREE CHURCH

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Volunteer Reference Form (Private and confidential)

[HBEFC_SG-010]

(name of applicant) has applied to volunteer at.....for the role of.....

They have given your name as a referee.

Volunteer Role Summary:

Your name and position:
Your relationship with the applicant:
How long have you known the applicant?
To the best of your knowledge, does this applicant have suitable skills, attributes and/or experience for this role? Yes / No
Comment:
To the best of your knowledge, is the applicant suitably mature as a Christian and walking in active discipleship? Yes / No
Comment:
Do you have any concerns or comments regarding their trustworthiness, responsibility, maturity, reliability or time-keeping? Yes / No
Comment:
Do you consider the applicant to be a 'team player'? Yes / No
Comment:
Are you aware of any safeguarding concerns or allegations relating to the applicant? Yes / No
If yes, please comment:
Do you have any concerns about the applicant's suitability to work with under 18s or vulnerable adults? Yes / No
If yes, please comment:
Is there any other information that you think would be helpful for us to know, when assessing the candidate's suitability for this volunteer role?

Signature.....

Print name.....

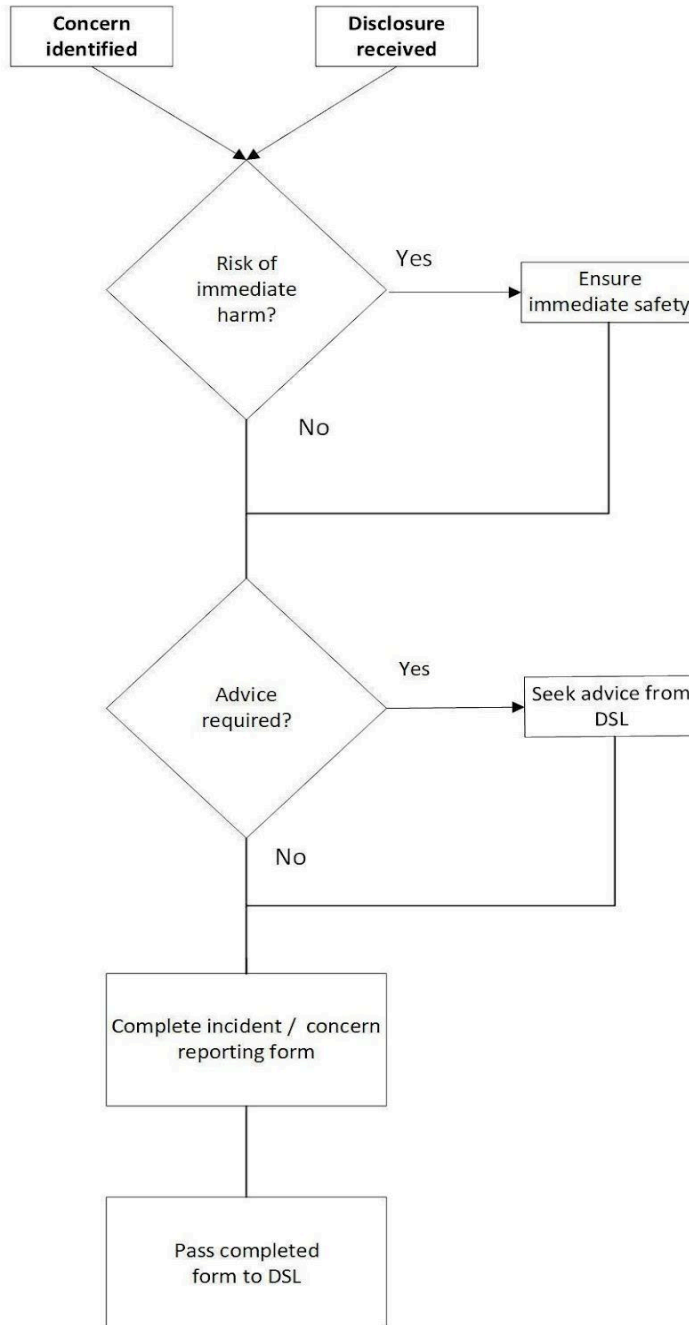
Telephone number.....

Email address.....

Thank you for providing a reference for the applicant.

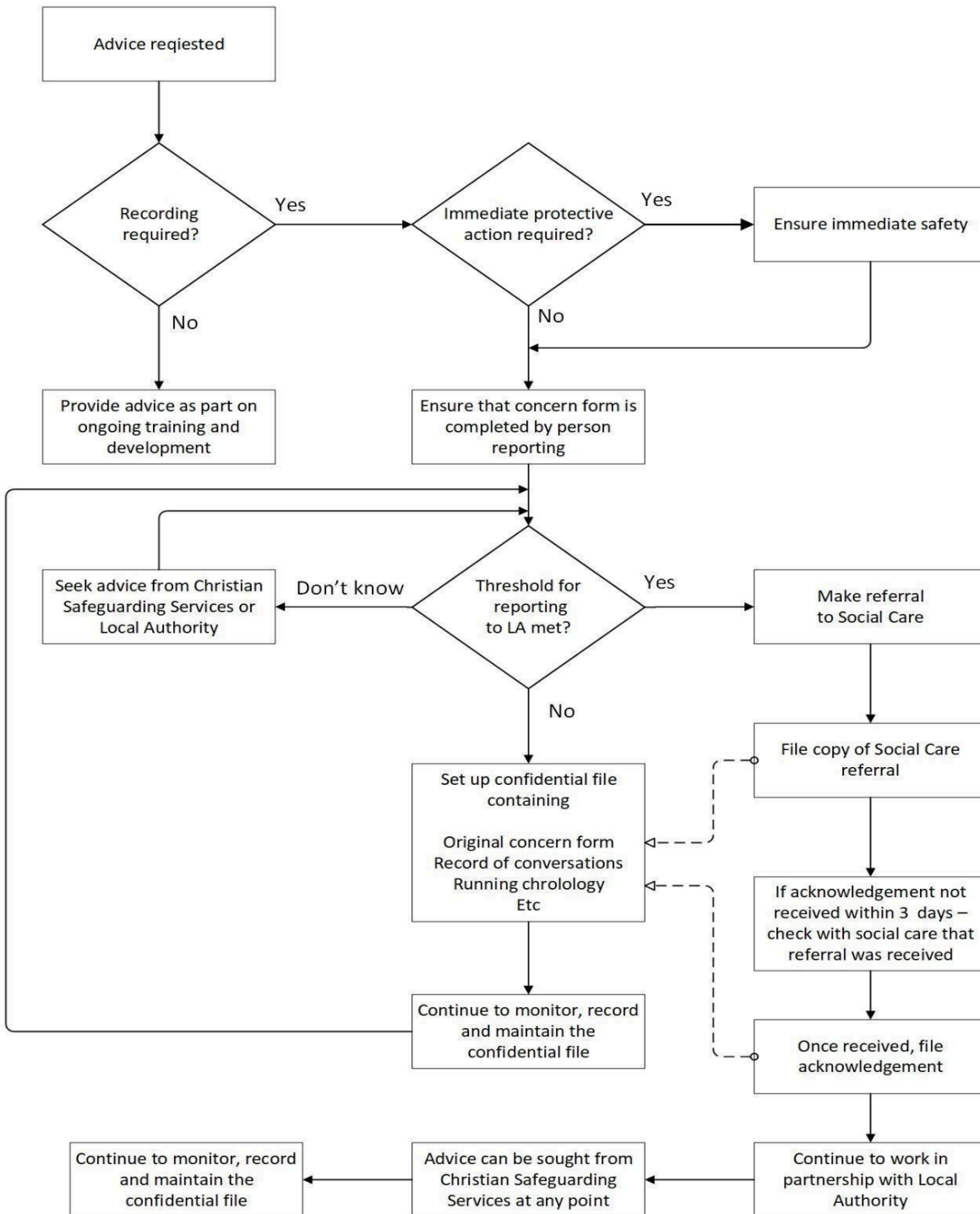
Appendix 8: Process flowcharts

Reporting concerns or disclosures



*Christian Safeguarding Services can be contacted for advice at any point in the process
Phone 07960 751778 or e-mail advice@thecss.co.uk*

Processing concerns or disclosures: the role of the DSL



*Christian Safeguarding Services can be contacted for advice at any point in the process
Phone 07960 751778 or e-mail advice@thecss.co.uk*

Safeguarding Information

*Safeguarding everyone at our church is a priority for us.
It's an outworking of our Biblical principles*

Church Name: **Herne Bay Evangelical Free Church**
Charity Number: **1178886**

Our **Designated Safeguarding Lead** is: **Doff Davey**

Phone: 07749 928783

Email: safeguarding@hbefc.org.uk



Our **Deputy Safeguarding Lead** is: **Sue Peeling**



Our **Safeguarding Elder** is: **Simon Buss**

In an emergency call your local authority's

Children's Services: 03000 41 11 11

Adult's Services: 03000 41 61 61

Or the Police

We subscribe to **Christian Safeguarding Services**

Advice line: **0116 218 4420**

Available 7 days a week between 7am and 10pm

Website: www.thecss.co.uk

Appendix 10: Guidelines for prevention of Bullying

The purpose and scope of this policy statement

Herne Bay Evangelical Free Church is committed to the prevention of bullying of all – adults, children and young people.

This policy statement is primarily concerned with the activities of the Church with children and families. These vary, but have included: Weekly Sunday Club, weekly Little Fish (term time only), and annual Holiday Bible clubs.

The purpose of this policy statement is:

- to prevent bullying from happening between children and young people who are a part of our organisation or take part in our activities
- to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need
- to provide information to all workers, volunteers, children and their families about what we should all do to prevent and deal with bullying.

This policy statement applies to anyone working on behalf of Herne Bay Evangelical Free Church, in a paid or voluntary capacity, and should be read alongside our general **Safeguarding Children and Vulnerable Adults Policy**, which describes our code of behaviour for working with children, young people and adults.

What is bullying?

Bullying includes a range of abusive behaviour that is

- repeated
- intended to hurt someone either physically or emotionally.

Bullying may include (but is not limited to) the following:

- name-calling, teasing or mocking;
- physical intimidation, such as hitting or kicking;
- unwanted sexual contact or sexually abusive comments;
- persistently stealing or “borrowing” items;
- inappropriate texting or e-mailing;
- sending offensive or degrading images by phone or e-mail;
- abusive use of social networking sites;
- gossip and harmful rumours;
- unwarranted exclusion from groups or activities;
- practical jokes which cause physical or emotional harm.

Bullies can be adults or children

Signs of bullying may include withdrawal and unwillingness to participate in activities, as well as physical symptoms such as torn clothing or bruises

We believe that:

- children and young people should never experience abuse of any kind

- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

We recognise that:

- bullying causes real distress. It can affect a person's health and development and, at the extreme, can cause significant harm
- everyone, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to bullying.

We will seek to prevent bullying by:

- adopting a code of behaviour that sets out how everyone involved in our organisation is expected to behave, in face-to-face contact and online, and within and outside of our activities

It is our group members' responsibilities to look after one another and uphold the behaviour code, by ...

- practising skills such as listening to each other,
- respecting the fact that we are all different,
- making sure that no one is without friends
- dealing with problems in a positive way
- checking that our anti-bullying measures are working well
- making sure our response to incidents of bullying takes into account:
 - the needs of the person being bullied
 - the needs of the person displaying bullying behaviour
 - needs of any bystanders
 - our organisation as a whole.
- reviewing the plan developed to address any incidents of bullying at regular intervals, in order to ensure that the problem has been resolved in the long term.

We recognise that bullying is closely related to how we respect and recognise the value of diversity.

Appendix 11 : Detailed guidelines on working with adults who pose a risk to children and adults

The premise is that everyone should have an opportunity to attend Herne Bay Evangelical Free Church even if they are known to pose a possible risk to children, and that as long as there is a plan in place, they are to be welcomed. As well as ensuring that children are not placed at risk, the person who poses the risk is assured that information concerning them and the risks they present are handled sensitively, confidentially and that the information is only shared with Elders on a “need to know” basis.

If information concerning a **church attendee who poses a risk** (*hereafter, the CAR*) is presented to a church member, they must confidentially pass it to an Elder as soon as possible.

The Elder will ensure that other Elders are informed in confidence, and that the information is passed through to the Safeguarding Officer.

The Safeguarding Officer will review the information and ensure that there is one church member designated by the Church Elders who acts as an on-going link - the Responsible Individual (*hereafter, the RI*) to the CAR.

The RI will meet with the CAR, and will talk with them about the information available, request any other material (such as probation reports, Multi Agency Public Protection Arrangements = MAPPA, etc.) and will compile a draft plan with the person who poses a risk. The RI and the person responsible for safeguarding in the Church should aim to meet with the Probation Officer if there is one involved, and the CAR if appropriate should be present. This is in order to ensure there is exchange of relevant information and that all information of risk is shared. The Probation Officer would be able to give an assessment of whether it is safe for the CAR to attend Church, what the conditions are for attendance, and this assessment must be adhered to. It may be appropriate that the Probation Officer shares the risk assessment with the RI, which must be confidential, but will give clear and well evidenced information relating to risk

This plan is likely to specify that the person cannot attend any specific activities with children/young people at the church. The plan may include a requirement that the CAR cannot attend any social activities, including tea/coffee after services, and can only attend the evening service, where there are likely to be no children/young people. Additionally, CAR should not hold any management roles/roles of responsibility in the Church as this could allow them opportunities to meet with and engage with children or those who are vulnerable.

This plan will be referred back to the Safeguarding Officer who will review it, and ensure that the plan is robust. This will be the “church management plan”, which will be signed by the person who poses a risk, the Safeguarding Officer and the RI in a 3 way meeting.

This plan will be shared with the Safeguarding Officer and Elders only.

The plan will be reviewed after 6 months, and then move to an annual review.

If there are any concerns about the CAR not adhering to the management plan, this will be brought back immediately to the Safeguarding Officer. Whilst the plan is reviewed, the person who poses a risk will be asked not to attend Herne Bay Evangelical Free Church or its activities.

Appendix 12: Lift giving

Lift giving for vulnerable adults:

If a vulnerable adult needs a lift they should be accompanied by a chaperone as protection, both for them, and the driver.

If possible the passenger should sit in the back of the car, particularly if there is no chaperone.

If the lift is arranged between two people, it does not come under the auspices of the church.

If it is arranged by the church, then it does.

Transporting children:

- There must be at least two workers in any vehicle, at least one of these should hold a current Enhanced DBS certificate
- If a girl is to be transported at least one of workers must be female
- Children must wear seat belts
- All children must sit in rear seats
- All children must usually have a separate signed parental permission slip for transport

Appendix 13 Whistleblowing

HBEFC strives to create an environment that is open, transparent, and accountable. We want to listen and respond well to any concerns raised by our staff and volunteers.

Staff and volunteers are encouraged to raise concerns about process, practice, or culture with the ministry team leader

If they do not feel able to do so, or if they feel that concerns raised have not been given due consideration, they can be raised in the first instance with the elder with oversight of that area of church ministry, or with another of the senior leaders, or with the Safeguarding Trustee or the Chair of Trustees

The concerns will be carefully considered, and a formal response will be provided to the individual explaining the decision. The examination of the concerns raised may conclude:

- The concerns are wholly or partially valid and require corrective action
- That the concerns did not take account of all relevant factors, and no further action is required
- That the concerns were invalid and have been dismissed

If the complainant is not satisfied with the response, they should formally raise the matter with the Safeguarding Trustee or the Chair of Trustees, explaining their concerns about the adequacy of the initial response. Details of how this can be done will be communicated at the same time as the initial response

Once the Trustees have considered the matter, they will formally respond to the complainant in writing, explaining their findings and the rationale for their decision.

Details of how to raise the complaint externally will also be provided as part of the response

This will include contacting the Charity Commission, details of the NSPCC whistleblowing helpline and any other measures that the trustees wish to offer