



THE CHURCH  
OF ENGLAND

# Safer Environment and Activities

**National Safeguarding Team**

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## Foreword from the Bishop of Bath and Wells

The Church of England places the highest priority on the safeguarding of children and adults. We have produced a number of policy and practice guidance [documents](#) to ensure all those who minister in the Church of England can do so as safely as possible. This document, Safer Environments and Activities, provides practical advice for parishes, and all those working on behalf of the Church engaging with children, young people and adults who maybe considered vulnerable, with advice on how to conduct day-to-day ministries safely. Along with advice on risk management planning and a more detailed look at who holds positions of responsibility within the Church there is also specific advice for different situations, along with best practice for those leading activities for children and young people.

We hope that this practical document will be well-used by leaders of children's and youth ministries, pastoral visiting teams, clergy, PCC members, and parish safeguarding officers. This guidance will help parishes to be confident to engage in new ministries, serving their communities and reaching those who are most vulnerable. Many parishes will already be implementing much of this guidance, as it builds upon previous material and well-established principles of safeguarding. Safer Environments and Activities brings together and simplifies earlier guidance, helping to reinforce the good practice that already exists, and assisting parishes to continue to improve what we do in order to live out our calling to reach our communities with the good news of the gospel.

**Lead Bishop for Safeguarding, Peter Hancock, Bishop of Bath and Wells**

## Introduction

The Church of England has made six clear commitments, set out in the House of Bishop's policy document Promoting a Safer Church, regarding the safeguarding of children and adults. The church has committed itself to:

1. Promoting a safer environment and culture
2. Safely recruiting and supporting all those with any responsibility related to children, young people and vulnerable adults within the Church
3. Responding promptly to every safeguarding concern or allegation
4. Caring pastorally for victims/survivors of abuse and other affected persons
5. Caring pastorally for those who are the subject of concerns or allegations of abuse and other affected persons
6. Responding to those who may present a risk to others

This document provides parishes with detailed guidance about the first of those commitments, Promoting a Safer Environment. It is intended to act as a 'How to...' guide to help churches meet that commitment in their everyday ministry. It covers topics such as expected standards of behaviour, adult-to-child ratios, parental consent, and risk assessments for activities. It has been produced to give clear guidance to many of the questions that parishes most often ask about keeping people safe in church.

The information in this document complements and expands upon the information in the Parish Safeguarding Handbook, particularly Chapter 11 of that document. The Handbook brings into one place the key safeguarding responsibilities outlined in all the House of Bishop's safeguarding practice guidance documents. Safer Environment and Activities gives further, in-depth guidance regarding specific topics relevant to the Promoting a Safer Environment commitment.

This guidance is underpinned by ecclesiastical law and Government guidance. It replaces Section 5 of Protecting All God's Children, 2010, including Annex A5 and Guidance Practice 2 and Appendix 3 of Promoting a Safe Church, 2006

## Who is the guidance for?

This document is for all those who need practical, straightforward and clear guidance regarding safeguarding children and adults in church. This will include clergy, parish safeguarding officers, children's work leaders and so on, but should also be used by anyone who is involved, paid or unpaid, in any such activity in church. This guidance is supported by a range of resources, including templates for forms, that are available in the Appendices and can also be downloaded from the safeguarding section of the Church of England website.

Under section 5 of the Safeguarding and Clergy Discipline Measure 2016, all authorised clergy, Bishops, Archdeacons, licensed readers and lay workers, church wardens and PCCs must have 'due regard' to safeguarding guidance issued by the House of Bishops. A duty to have 'due regard' to safeguarding guidance means that the person under the duty is not free to disregard it but is required to follow it unless there are cogent reasons for not doing so ('cogent' for this purpose means clear, logical and convincing). Failure by clergy to comply with the duty imposed by the 2016 measure may result in disciplinary action. All decisions not to pay 'due regard' must be recorded and the reasons clearly stated. Whilst this document is primarily a best-practice guide, the duty to give due regard ultimately applies; a significant failure<sup>1</sup> to follow the guidance in this document may result in a complaint being made under the Measure, in particular if a child or adult is harmed as a result of this failure. In addition, failure to have due regard to House of Bishops' Safeguarding Policy and Practice Guidance may have direct consequences for the validity of your insurance.

## When should this guidance be used?

The guidance should be used for all activities involving children, young people and vulnerable adults, either within church buildings or in other locations but carried out on behalf of the church. These activities could be Sunday schools, crèches, holiday clubs, youth clubs, mixed age groups, trips, choirs, bellringing, lunch clubs, pastoral home visiting and support, mental health support groups, outreach to the homeless, food banks and so on.

This guidance does not apply to private arrangements made by young people, parents and adults or activities organised by organisations outside the Church of England. If you are not sure whether an activity falls within this guidance, please consult the Diocesan Safeguarding Adviser.

## How should this guidance be used?

This document provides guidance regarding many common church situations. Whilst every attempt has been made to be comprehensive, it is not possible to cover every eventuality. There may be times when judgement is required to apply the principles in this guidance to situations not explicitly covered.

In each section, the guidance explains the main practices that should be applied. In some cases it gives examples to illustrate what these practices should look like in everyday church

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<sup>1</sup> It is not possible to provide a list of features that would constitute a 'significant failure'. Common sense dictates that there is a distinction between, for instance, a one-off failure to record a minor first-aid incident involving a young person (page 16) and a serious breach such as failing to risk-assess an activity in which a child is seriously harmed (pages 8-15). The 'best-practice' nature of this guidance is reinforced, ultimately, by the 'due regard' duty attached to all House of Bishops' safeguarding documents.

life. Links are provided to the templates and other resources referred to in the guidance, to make it as easy as possible to locate the tools necessary to put the guidance into practice.

# 1. Running Safe Activities – The Foundations of Safe Practice.

Whilst much of this document focuses on very practical topics, we begin our thinking about safe practice by looking at some of the underlying aspects, in particular with regards to our relationships within church. Much of our safeguarding practice in church is built upon how we relate to each other, expressing and demonstrating the love of God in every aspect of our relationships and valuing the image of God in each person. In this regard, safeguarding is a core Christian activity:

The core of safeguarding relies on an understanding of the dynamics of power and vulnerability in relationships. This is not specialist activity that is only undertaken by those with qualifications in the safeguarding field. To practise safely, ministers and others engaged in pastoral work, community work or counselling need to reflect on these issues and their boundaries in these relationships...The evidence from secular organisations working in the social welfare field is that good safeguarding...is an indicator of good practice in other areas. It is hard to think of reasons why this would be different in the Church, which may overuse the phrase 'watching over one another in love' without thinking through what this means in practice'.<sup>2</sup>

## 1.1. Positions of Responsibility.

**1.1.1. What is a Position of Responsibility?** A person is in a position of responsibility if they have a role that gives them authority over others. They will be expected to use that authority for the benefit of those they are responsible for, not to take advantage of or exploit them. Examples of church officer roles which are regarded as 'Positions of Responsibility' are listed below. (Please note this list is not exhaustive and there may be other roles which should/would be regarded as Positions of Responsibility).

- Clergy
- Licensed and Authorised Lay ministers e.g. Readers
- Worship Leaders
- Safeguarding Officers / Advisers
- Youth Leaders and workers (and leaders of Parent & Toddler Groups)
- Churchwardens
- Children's leaders and workers
- Music/Choir leaders
- Leaders of groups for adults who may be vulnerable e.g. elderly, adults with mental health issues, refugees, the homeless
- Parish volunteer drivers – who drive vulnerable groups (children and/or vulnerable adults)
- Bell ringers who teach or train young people and Tower Captains
- Lay people authorised to provide pastoral care – For instance, this will include Pastoral home visitors, Authorised Listeners, Pastoral Outreach workers.

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<sup>2</sup> [Courage, Cost and Hope: The Report of the Past Cases Review](#), 2013-2015, The Methodist Church.

**1.1.2. The perception of others.** The above list suggests some of the ‘typical’ roles which would be defined as ‘positions of responsibility’. However, it is important to remember that to visitors – and especially to children – almost any role within church conveys a level of trustworthiness and respectability. All those who are involved in church life must consider how they relate to others and, in particular, to those who are vulnerable.

**1.1.3. Why is this important?** All relationships in church should be characterised by generosity, care and kindness. Particular care should be taken when that relationship involves a level of responsibility for or authority over others. That responsibility and authority must be exercised in a trustworthy way, acknowledging the power and influence that can be exerted, perhaps even inadvertently, over others. Thinking about power and influence, which we do briefly below, is at the heart of what safeguarding is about.

**1.1.4. Power in relationships.** The relationship between a person in a position of responsibility in church and those they minister to is one of power or influence. The relationship is not between equals. Particular care must be exercised, meaning that those in positions of responsibility must:

- Be aware of the power and influence they have and use it in ways that respect and empower others;
- Recognise that power and influence can act in subtle and quite covert ways, and are not just limited to more obviously domineering leadership styles.
- Maintain clear boundaries in relationships, avoiding using their role to establish relationships of inappropriate intimacy or dependency with those for whom they have responsibility;
- Not use their power to abuse, exploit, bully, intimidate, coerce or undermine.

Someone seeking assistance may be distressed, sad, confused or frightened, adding to their vulnerability. This makes it even more important that those responding to them are aware of their status and power. Relationships can become blurred, dependant or exploitative in such situations if boundaries are not maintained. This is all the more the case in church, where our relationships may be less formal than other settings.

In certain settings such as teaching, it is a criminal offence to engage in sexual activity with students even when that student is over the age of consent (i.e. when they are 16 years old or over). The legal term for these roles is Position of Trust. The guidance you are reading now uses ‘positions of responsibility’ rather than ‘Positions of Trust’ to avoid confusion with the recognised legal term, but the underlying principles are similar. The law regarding Positions of Trust does not currently apply in faith settings, for instance with youth leaders, clergy, choir leaders etc.<sup>3</sup> However, the firm position in this guidance is that sexual activity between an adult and a 16 or 17 year-old child, when that adult is in a position of responsibility in a church setting as defined above, is a breach of that position and will be treated as a serious safeguarding situation. If the adult in question is ordained, such a breach would lead to a complaint under the Clergy Discipline Measure.

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<sup>3</sup> The Church of England is supporting a call for the law regarding Positions of Trust to be extended to clergy and others exercising authority in a church setting.



## 1.2. The Code of Safer Working Practice.

1.2.1. Churches should make clear what they expect of people who work or volunteer with children, young people, and vulnerable adults. One common way of doing this is to provide a written description of behaviour that is, and is not, acceptable. This is provided in section 11.1 of the Parish Safeguarding Handbook, 'Code of Safer Working Practice', and is available for those reading this document online by clicking on the link below.<sup>4</sup>

### [Code of Safer Working Practice document](#)

1.2.2. Researchers studying institutional settings in which abuse has taken place have found that expectations were rarely made clear regarding how staff or volunteers should behave around children or vulnerable adults.<sup>5</sup> These institutions may have assumed that people 'knew how to behave' but gave no clear instructions about what was acceptable and, crucially, what was not. The Code of Safer Working Practice is a simple way to make clear what is expected of all who minister to children and vulnerable adults in church. They are also very useful for communicating your church's values regarding how people should be treated.

1.2.3. Using the Code of Safer Working Practice: Inducting new staff and volunteers. The Code of Safer Working Practice should be part of the 'induction' process for all new staff and volunteers. Depending on the size of the church, 'induction' may be quite formal or it may simply be a meeting with the incumbent and/or parish safeguarding officer before someone takes up their responsibilities. Either way, best practice is to provide two copies, both signed and dated by the individual, with one copy kept by them and another retained by the activity leader (or in the personal file of an employee). In the event of a breach of the code of practice, this allows the activity leader to reinforce expectations by simply reminding the person that in signing the contract, they agreed to comply with it.

1.2.4. Using the Code of Safer Working Practice: empowering parents, children and vulnerable adults. Codes of Practice should be used to make clear to staff and volunteers how to behave, but can also be given to parents, children and vulnerable adults so that they know what to expect, and most importantly what behaviours are 'out of bounds'. Parents, older children and many vulnerable adults can be given the same document that staff and volunteers are provided with; younger children should be given age-appropriate versions.

Example: Mike and Corinne, who are not Christians, were surprised when their 14 year-old daughter Lauren joined the local church. Lauren's friend Hayley had invited her to the youth group; Lauren said she was really interested and would like to keep going. The youth leader, Tom, phoned Mike and Corinne and offered to meet. They were impressed with Tom and felt reassured that Lauren was going to a friendly and well organised group. During the meeting Tom explained how the group was run, including the safeguarding procedures. He gave Mike and Corinne a copy of the parish safeguarding policy, and also the Code of Safer

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<sup>4</sup> Section 11.2 of the *Parish Safeguarding Handbook* provides guidance on 'Acceptable Touch'. As this is such a crucial element of safeguarding practice, the *Handbook's* guidance on touch has been added to the Code of Safer Working Practice. It is recommended that parishes issue staff and volunteers with both sections.

<sup>5</sup> See e.g. Erooga, M., 2009. *Towards safer organisations*. London: NSPCC.

Working Practice for volunteers who work with children. He said that Lauren had received a copy of the same code.

A few months later Corinne saw Lauren being dropped off after an evening meeting by a young male youth leader. Only this leader and Lauren were in the car. Corinne wasn't sure whether or not this was OK, but remembered something about it in the Code of Safer Working Practice. She re-read the code, noting what it said about leaders being on their own with children. Corinne emailed Tom who said he would look into it. He spoke with the leader, Simon, the next day and took him through his signed code, highlighting what was said about lone working and giving lifts. Simon said he was sorry, he had just forgotten that evening, and would not do it again. Tom contacted Corinne and asked if he had her and Mike's consent to speak with Lauren. Corinne said she had already done so and Lauren said nothing had happened, but she was fine with Tom doing so too. Tom and his co-leader discretely spoke with Lauren at the next meeting, explaining that they had her parents' permission to do so. Lauren confirmed that nothing untoward happened on the evening in question and she hadn't felt uncomfortable, and said that there were no other occasions when Simon had tried to be on his own with her.

Tom met again with Simon, acknowledging his explanation but making clear that following the Code of Safer Working Practice is a basic requirement, warning him that any further breach may result in a suspension. Tom advised the parish safeguarding officer and vicar of the issue and recorded it in both the safeguarding log and in Simon's file. He emailed Corinne to thank her for raising this, letting her know how the matter had been dealt with. Tom raised the Code of Safer Working Practice at the next leader's meeting for the youth group, reminding everyone of the importance of demonstrating safe practice with young people.

Question: Let us accept, on this occasion, that the youth leader's explanation was legitimate; he had just forgotten about this section of the Code of Safer Working Practice. What would you say to him to impress on him how important it is that he observes all sections of the code? Consider your answer and then read the footnote below.<sup>6</sup>

#### **1.2.5. Using Codes of Safer Working Practice:** reinforcing messages through training.

The Code of Safer Working Practice can be used in training your staff and volunteers. This can be by way of a simple monthly team meeting, perhaps by discussing how the code is being observed and whether team members feel that things could be improved. The Code of Safer Working Practice can also be used in more formal training sessions, perhaps when delivering the 'Foundation' safeguarding training course in a local church setting. The point is that using the code allows a church to regularly reinforce expectations of how people should behave.

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<sup>6</sup> In this case, we should make clear to Simon that part of his role is to demonstrate how safe adults behave towards young people. All the adults at church should demonstrate to Lauren that safe adults do not create opportunities to be on their own with her, such as offering her lifts alone in the car. Simon may not have sinister intent towards Lauren, but the next adult who tries to get her on her own might do. By 'normalising' the situation of being on her own with an adult leader, Simon may have made it harder for Lauren to tell the difference between safe and unsafe adults, regardless of his lack of intent. The 'warning signs' that might help her recognize risky situations may not be as apparent, because Simon has made it more difficult for her to understand where the boundaries of safe behaviour lie. Conversely, by demonstrating how safe adults should behave, leaders in church can help both children and vulnerable adults know what they have a right to expect, and to distinguish between safe and unsafe behaviours. This is a great service to the people we minister to in church, and one of the main reasons why we observe the principles of safe practice.

**1.2.6. Using Codes of Safer Working Practice:** addressing low-level concerns<sup>7</sup>. By incorporating the code into the induction process for new staff and volunteers, your church will give itself a simple way of addressing low-level concerns<sup>8</sup>. about people's behaviour. As your people will have signed to say they will abide by the code, a low-level breach can be addressed by simply reminding them of how they agreed to behave. Addressing safeguarding concerns can be very difficult and emotive, both for the people doing it and for the person being confronted. Referring to their agreement to abide by the code allows the focus to be purely on behaviour rather than on accusations regarding intent, which are likely to be highly inflammatory when dealing with low-level concerns.

Example: Harry, 29, volunteers for the children's work at church. During his induction he signed the Code of Safer Working Practice. Three months later, another helper tells the parish safeguarding officer that Harry had a five year-old girl sitting on his lap for ten minutes during a children's work session. When questioned, Harry explained that she had been extremely upset and had sat down of her own accord. He was surprised and felt uncomfortable, but said that because she was crying he did not feel able to push her away. Another helper gave an account of the incident which supported Harry's recollection. The girl's parents explained that her grandmother was very ill and this was really upsetting her, and did not complain about Harry's behaviour. The matter was recorded in the safeguarding log, and Harry was reminded of the section in the code about acceptable touch. He said he understood and would make sure to behave differently if in that situation again.

Consider the following questions, and then check with the answers in the footnotes:

Question: How might you help Harry think about what else he could have done?<sup>9</sup>

Question: What would you do if something similar happened, between Harry and another girl, in a few months time?<sup>10</sup>

### **1.2.7. The professional conduct of clergy.**

The unique role of clergy means that a particular responsibility rests on them to demonstrate Christian character in all their interactions with others. In addition to the Code of Practice, clergy must comply with the [Guidelines](#) for the Professional Conduct of Clergy, from which the extract below comes:

The solemn reminder about trust that is in the Ordinal confronts all the ordained with the privilege and responsibility entailed in their particular ministry. We know that the Church of God expects high standards, but it also remains true that society at large expects high

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<sup>7</sup> One of the findings of studying institutions in which serious abuse has occurred is that they have no way of addressing low-level behavioural concerns, meaning that 'warning signs' go unheeded. This section suggests one way of constructively achieving this.

<sup>8</sup> More serious concerns should be referred to your Diocesan Safeguarding Adviser or, in the event of risk of imminent harm, the statutory safeguarding authorities in your area. If in doubt about whether the concern is serious, consult your DSA.

<sup>9</sup> It is not reasonable to expect Harry to have pushed this girl away, but he could have gently got her to sit on her own, perhaps by saying that he was going to get a tissue so that she could wipe her eyes, and then sitting next to her whilst she was still upset.

<sup>10</sup> Patterns of behaviour are important, especially if they persist beyond when the person has been confronted. If Harry is observed in another similar situation, you should escalate your response to a more formal conversation (such as the one Tom has with the youth leader in the above example). Further repeats of such behaviour should be escalated to the Diocesan Safeguarding Adviser.

standards of the clergy. This is true of both those who profess faith in Jesus Christ and those who do not.<sup>11</sup>

### **1.3. Managing risk in church activities.**

We assess and manage risk every day, across many activities, often automatically. On a hot day parents will pack a sun hat and sunscreen for their young children almost without thinking. In a downpour we drive more carefully and go easy on the brakes. We insure our valuables, vaccinate our pets, take care with sharp knives, and lock our doors. All of these activities involve, at their core, an assessment of risks and a plan to manage them.

#### **1.3.1. A structured approach to manage risk.**

This section explains how to manage risk in church activities with children and vulnerable adults. You will be doing much of this already, but it is important to have a structured, recorded approach to risk management, for the following reasons:

A structured approach sharpens our thinking: Following the approach outlined here will prompt you to consider risks carefully and methodically. We can all take short-cuts at times, especially when we're busy. Taking time to make and record a plan can help ensure that this natural tendency does not prevent us from managing identifiable risks.

A structured approach ensures consistency: One person in your team might be level-headed about risk. Another might be risk-averse, someone else a bit too carefree. A written plan helps to avoid under or over-reacting to risk, facilitating enjoyable activities whilst keeping things safe.

A structured approach ensures resilience. Consider this example: Sophie, her church's youth leader, always runs the youth-group camping weekend. She organises every detail and it's always a huge success. This year Sophie falls ill and someone needs to step in last-minute. What do they do? If Sophie has a written plan which details the identifiable risks and how they will be managed, it is far easier for someone else to ensure that the weekend goes as smoothly, and as safely, as possible.

A structured approach provides for accountability. Local church activities are undertaken in the name of the PCC who should exercise a degree of oversight and scrutiny. This does not mean micro-management, but the PCC should be able to see that risks have been properly identified and managed. This is particularly important when things go wrong; risk can never be eradicated, but a written plan will enable the PCC to identify whether all reasonable steps were taken to manage the identifiable risks.

#### **1.3.2. What does a risk management plan look like?**

The phrase 'risk management plan' sounds very formal and can be quite intimidating, but in reality producing one is quite simple. We manage risks every day; the main difference here is that we are planning systematically and writing things down.

Consider this simple, everyday example:

It is the hottest day of the year so far. Matt and Ravinder decide to take their two young children to the beach. Ravinder checks online and sees that the UV warning is at the highest level. She packs sun hats for both the children. Matt reminds her that they ran out of factor-50 sunscreen last week, so on their way to the beach they pop in to the local store to get

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<sup>11</sup> Extract from the foreword by the Archbishops of Canterbury and York to the 'Guidelines for the Professional Conduct of the Clergy 2015'.

some more. They leave the house early so that the children can have fun on the beach but they can leave before the sun climbs too high in the sky.

Matt and Ravinder will write none of this down, but for our purposes here we can reproduce what they did in this simple table below. (Please note, given the family context, the example below is more informal and 'chatty' than the typical church example).

<i>What is the risk?</i>	<i>Who might be harmed?</i>	<i>What are we already doing to reduce the risk?</i>	<i>What additional steps do we need to take?</i>	<i>Action by whom?</i>	<i>Action by when?</i>	<i>Recording</i>
<i>The UV warning is very high – the risk is sunburn.</i>	<i>The children, who will be in swimming costumes so they can paddle in the sea.</i>	<i>Get to the beach early before the sun gets too strong. Take sun hats for the children.</i>	<i>Stop off at the store on the way to the beach and get some waterproof sunblock. Keep an eye on the children and re-apply sunblock as necessary.</i>	<i>Matt and Ravinder (note: with an example like this, this and the next two boxed are redundant, but Matt and Ravinder might decide whose responsibility it is to ensure they don't run out of sun block again!)</i>	<i>On the way to the beach!</i>	<i>(Again, not relevant in this example, but good to record who does what in a church setting).</i>

### 1.3.3. The seven steps of risk management.

Managing risk involves the following steps for all activities in church involving children and vulnerable adults<sup>12</sup>:

#### i. What are the risks?

Here we are simply identifying 'what could go wrong?' For instance, if your church has a summer barbecue, one risk you should identify is someone getting a burn whilst cooking on the flames. Remember that this activity is about risk identification, not risk speculation. We're not imagining highly improbable risks here! Risk management is about sensible precautions, not seeing mortal danger everywhere.

<sup>12</sup> As this guide is part of the House of Bishop's safeguarding practice guidance, it focuses on the particular areas of risk-management as it relates to the safeguarding of children and vulnerable adults. Risk-management, however, goes beyond safeguarding, and your PCC should also keep a risk-register for non-safeguarding risks such as financial, reputational, and so on.

**ii. Who might be harmed?**

Try to be specific; 'everyone' is usually not a helpful answer to this question. It might be the risk you have identified applies equally to all the children or adults in an activity, but it may be that there are specific risks that apply to only a few. For instance, in a game of rounders, a child with severe exercise-induced asthma will have a risk that is specific to them. You need to identify this risk and have a plan to manage it (which in this case will largely revolve around making sure they have their inhaler with them before you start the game).

**iii. What are you already doing to reduce the risk?**

It is very unlikely that your answer to this will be 'nothing'. You will probably have put some thought into managing risks already, and you may find that you are doing a number of things 'automatically' without really thinking about it. It's useful to take time to consider what you're already doing; this can be quite an encouraging exercise, and also helps you to identify where your strengths are. Listing what you are already doing is also a good step towards being able to train other people in managing your activities, should the need arise.

**iv. What additional steps are you going to take to reduce the risk?**

You may have found that you are already doing everything you need, but the point of writing everything down in a planned way is to identify anything additional. Keep things as simple and achievable as you can, but try to ensure that you have at least one action to manage and reduce any risk you have identified.

**v. Action by whom?**

Safeguarding is everyone's responsibility, but not everyone needs to be responsible for each action. Make sure that everyone knows what their responsibility is; don't need up in the position where everyone thought someone else was going to bring the first aid kit! The activity leader should have a copy of the risk management plan with them, so they know who is responsible for what. This helps them to ensure things are done, but also makes it easier to identify what is not going to get done if someone isn't there – meaning that this task can get swiftly delegated to someone else.

**vi. Action by when?**

Some actions are 'rolling'; they just need to be done on each occasion an activity takes place (such as checking Marcus has his inhaler with him in the example below). Other examples, such as 're-stocking the first aid kit', need to be done in a timely fashion. Setting a do-by date is the most simple way of ensuring this.

**vii. Recording**

Keeping a simple record of what has been done to manage risk; it helps learning, it enables leaders to check that nothing is outstanding, and in the event of an accident it enables the group to demonstrate what they had done to minimise risk.

**1.3.4. Keeping things under review.**

You do not need to do a new risk management plan every time you repeat an activity. The plan you have should be sufficient for repeat activities, but it is a good idea to keep it under periodic review. Comprehensive reviews and updates should occur at least annually, with regular interim reviews occurring on a quarterly basis, ideally in a team meeting. Reviews allow you to ask; is this plan still up-to-date? Have the circumstances changed so that we need to update it? Have we learned anything that shows us that it needs to change? You



should always be prepared to update a risk management plan if circumstances change (in the example given above, if a child with severe asthma joins your youth group, your plan for energetic activities needs updating immediately), and the risk management plan should be a well-thumbed document with which all your team are familiar. There is no point having a plan that no-one can remember!

### 1.3.5. An example of a risk-management plan.

Below is an example of a risk management plan for a game of rounders at the church youth group. As this is an example it only lists two risks (there may be more), one to the whole group and another to a particular child within the group. It also gives annotated notes in italics to help explain the thinking behind the plan. The Church of England recommends the use of the Activity Risk-Assessment Template, available [here](#).

What are the risks?	Who might be harmed and how?	What are you doing already?	Do you need to do anything else to reduce the risk?	Action by whom?	Done?
Injury to a child. ( <i>You don't need to list every possible scenario that could lead to such an injury, unless a particular scenario requires a specific risk-management action</i> ).	The children playing rounders. ( <i>There is some level of risk to all children, but think about whether you need to be more specific, depending on your group</i> ).	Enough adults to manage activity safely;  First aid kit available at the game;  Two adults trained in basic first aid.	Safety 'briefing' before event;  Use light-weight rounders ball and bat.	Event leader to check proper equipment is available before each event;  Event leader to give safety briefing before each game.	<i>Note: it is good practice for repeated actions like this one to just have a simple checklist to identify all the necessary actions.</i>
Marcus, who suffers from exercise-induced asthma, has an asthma attack during the game.	Marcus.	Marcus' parents have agreed to ensure he has his inhaler with him before he leaves the house to come to the group.	Check that Marcus has his inhaler with him, that it is not empty, and that he takes a puff before the start of the game.	As the event leader needs to take responsibility for the whole game, one person is designated to ensure this action takes place.	See above.

## 1.4. Emergency Planning

1.4.1. Accidents are by definition unanticipated, but that does not mean they should be unprepared for. It can feel a bit strange to make an emergency plan, because you

are preparing for something you hope will never happen. Experience shows, however, that it is much better to have a plan and not need it, than to need a plan and not have it. It is also preferable to agree an 'in the event of an emergency' plan beforehand, when you are calm, not in the middle of the incident itself! Having an emergency plan can help people feel confident enough to take sensible and managed risks, opening up a wider range of activities, making our work with children and vulnerable adults more enjoyable and rewarding for all involved.

- 1.4.2. The version of an 'emergency plan' that people are most familiar with is a fire drill. Other examples could be 'role played' in a team meeting. For instance, what are you going to do if someone in your group has an accident that requires medical attention, or if someone on a trip goes missing temporarily? You will never cover all eventualities, but by having a plan for some obvious examples, you can help people become more confident in dealing with many situations that can arise.

## **1.5. First Aid**

- 1.5.1. It is recommended that at least one of the leaders in a group for children or vulnerable adults attends a recognised First Aid course, such as one-day Emergency First Aid Training.
- 1.5.2. A first aid kit should be available in premises and also on outings and trips. Kits should be easy to access – for instance, if the church hall is a separate building from the church itself, it will make sense to have a first aid kit in each building. There is no formal standard regarding what first aid kits should contain, but excellent advice is available from St John's Ambulance and the Health and Safety Executive.
- 1.5.3. When administering first aid, record what led up to the treatment, what treatment was administered, and who was present. Use an accident book to record this. If the activity leader is not present, they should be made aware of what happened as soon as possible, and should countersign the accident log and make any comment that is necessary.
- 1.5.4. More serious incidents will need separate fuller reports by those involved and the group leader. It is possible that these reports may need to be provided to the Diocesan Safeguarding Adviser, your insurers, or another relevant body. Consult your DSA in these instances.
- 1.5.5. Inform the parent(s) or carer(s) promptly in the event of an accident to a child or young person or vulnerable adult, including details of any first aid administered. In the case of a slight injury, the parent or carer should be told when the child or vulnerable adult is collected or informed soon after the activity.

## **1.6. Medication**

- 1.6.1. Parents of children who require medication will usually make you aware of these needs and expect you to follow the medication plan they set. Details should be included in the registration form. No medicines should be given to children without the permission of parents or carers. Additionally, children over 13 years old need to consent to being given medication. With adults who lack the ability to administer medication themselves, you should follow the plan agreed by their carer(s).
- 1.6.2. Depending upon the age and understanding of the child or vulnerable adult, they should be encouraged to self-administer medication or treatment. Again, details of this should be discussed with parents and carers.



## **1.7. Fire Safety**

- 1.7.1. Fire safety is a vital topic which impacts upon safeguarding, general safety in church, and building-management. It is covered in detail in Ecclesiastical Insurance's [document](#) Church: Fire Risk Assessment. Churches should print out and follow carefully the advice in this document or one provided by a different insurer if applicable.

## 2. Activities for Children and Young People – Specific Topics.

### 2.1. Basic Principles

- 2.1.1. In addition to what is outlined above, and what is set out in the Code of Safer Working Practice, certain basic principles should be followed when working with children in church:
- 2.1.2. Avoid lone working: Those working or volunteering with children on behalf of the church should avoid situations where they are on their own with a child. This includes 'formal' situations such as youth groups, choirs and bell-ringing, and so on, and less formal setting such as before and after those groups, giving lifts home, and so on.
- 2.1.3. Observe an appropriate age-gap: A five-year age-gap between children and those working with them is highly advisable. This may not always be possible with, for instance, trainee youth-workers, but in that instance the group should be led by other adults who are at least five years older than the young people in the group. For young helpers this should also apply; a 17 year-old helping in the children's work should help with those 12 years old or younger.
- 2.1.4. Carefully observe the Acceptable Touch guidelines in the Code of Safer Working Practice: Research shows that many child sexual abusers regularly initiate touch and then gradually sexualise that touch, conditioning the child to accept this as normal. It is our responsibility to work with young people in a way that helps them learn how safe adults behave around them. Letting them know that it is not normal for adults who work with children to initiate touch with them helps them to develop expectations that will keep them safe in settings beyond church.

### 2.2. How many helpers are needed?

- 2.2.1. The reality of parish life is that getting enough people to help can be challenging. The guidance provided here is recommended 'best practice'. On individual occasions (i.e. a Sunday morning in the summer holidays) it may not always be possible to meet all of the requirements outlined below. This should be the exception rather than the rule. In particular, the restriction regarding lone-working should be followed without exception. If only one adult is available to lead the activity, it should be postponed until an appropriate amount of adult leaders are available. If the ratios provided below are consistently impossible to meet, PCCs will need to consider the sustainability of the children's work being offered and whether a different model could be used.
- 2.2.2. OFSTED prescribes minimum staff–child ratios for those groups which are required to register with it ( see section 2.3):

Child's Age	Number of adults	Number of children
0-2	1	3
2-3	1	4
4-8	1	6
9-12	1	8
13-18	1	10

- 2.2.3. Parents, carers, and occasional helpers can be included in these ratios if they have been formally recruited and trained. If they have not, they can offer additional support under the immediate supervision of a leader who has been safely recruited.
- 2.2.4. With parent-and-toddler groups such as Messy Church, best practice is to have a minimum of two adult leaders who are not there with their own children running the group. It is recognised that this is not always possible, but this should be the ideal that is aimed for.
- 2.2.5. These ratios are for guidance. It may be necessary to have more helpers available for specific reasons, for example if children have special needs, or if a risk assessment has shown additional hazards that need to be managed.

### **2.3. Young Helpers.**

- 2.3.1. Helping in activities for children can be an excellent opportunity for people under 18 to participate in church life. If your church provides opportunities for young people to serve in this way, make sure you follow the advice at the start of this section regarding a five-year age gap between these young people and the children they are helping with. It is best to designate any young person helping in this way as a 'helper' rather than a leader, and to ensure they are supervised by an adult who has been safely recruited, and who can take overall responsibility for the leadership of the group. (Remembering that the young person is themselves legally a child, and that the adult leader has safeguarding responsibilities for them too). You should avoid counting these young people as part of the adult/child ratios outlined above; they are additional helpers, not part of the core team. It is particularly important to follow the lone working rule, and not to consider an older child who is helping out to be the equivalent of an adult for the purposes of observing this rule. (For instance, a 17 year-old who is a helper shouldn't be in a planning meeting on their own with the adult leader). Two adults should be present with children at all times.
- 2.3.2. For some situations (e.g. crèche) it may be appropriate to have children under the age of 16 helping on an occasional basis. However, it is recommended that 14 is the minimum age, and that young helpers are utilised only occasionally. Any such opportunities should be seen as a chance for the young to grow in responsibility rather than to 'help the church out' when volunteer numbers are low.

### **2.4. OFSTED Registration.**

- 2.4.1. If a PCC or other church body provides a group for children under the age of eight who attend regularly for more than two hours a day or for more than fourteen days in any period of twelve months, without their parents/carers, they will need to register the activity with OFSTED unless an exemption applies.

### **2.5. Work Experience and Community Service.**

- 2.5.1. On rare occasions local colleges may place students in a church setting, such as youth work. Additionally, young people may be placed in church as part of a community service scheme, for instance as part of their Duke of Edinburgh award. The placing school or college will have its own policies; the church should liaise with them to ensure that their requirements are also complied with. All those on placement should be asked to sign the Code of Safer Working Practice as outlined above, and the church should make it clear to the placing college/body that the Parish Safeguarding Handbook and the guidance in this document will be followed.

## **2.6. Consent to Activities.**

- 2.6.1. Parental Consent. Parent or carer consent is needed for any activity for their children at which they are not present. Often this will be implicit, for example through attendance at Sunday School or a youth club. Implicit consent will suffice for regular group activities. Written parental consent forms must be obtained for activities off the premises. These must include contact details of the parent or carer, details of any special needs of the child, and permission as necessary for taking photographs, videos and other images. (Please note that in addition to parental consent for photographs etc, children over the age of 13 must give their own consent before taking or using images of them). Model parental consent forms for activities and trips, transport and photographs<sup>13</sup> are available by following these links and are also included in the Appendices.
- 2.6.2. Consent by children and young people. It is good practice to obtain agreement from children and young people to any activity in which they are involved, though again this is often implicit in their attendance. If a young person is of sufficient age and understanding in relation to the specific issue they are being asked about, they can give their own agreement independently of their parents. So, for example, while parental consent is always required for a group residential holiday, an older teenager would usually be able to consent to the photos from the holiday being displayed in church. You should record who has given consent for any specific activity.

## **2.7. Good Behaviour for Children and Young People.**

- 2.7.1. Ensuring children are safe in church activities includes thinking about the behaviour of children towards each other. Most safeguarding standards for organisations working with young people include anti-bullying as a specific area of focus.
- 2.7.2. As with adults who work or volunteer with children, codes of behaviour are a good way to make expectations clear. Best practice is to work with children and young people to come up with an agreement of 'How we treat each other' amongst themselves. You may wish to ask young people how they feel they should speak to each other, how they should relate when in disagreement, what they should say about each other on social media, and so on. An exercise such as this is more likely to produce something meaningful to the young people in your church than a set of standards handed down by leaders.

## **2.8. Record Keeping in Children's Activities.**

- 2.8.1. Contact details for parents of children attending groups in church should be kept by the group leader. The leader should record each child's name, address, date of birth, contact number for their parent or carer and parental consent for activities. They should be readily available for leaders and helpers in the event that, for instance, a referral needs to be made to the safeguarding authorities. They should be regularly updated so that personal data is only kept for as long as needed.
- 2.8.2. Records of children attending each event/activity should be kept by activity leaders. These records do not need to be stored indefinitely, but it is good practice to retain them for up to twelve months.
- 2.8.3. Specific incidents should be recorded separately. Best practice is to keep two record records; an Accident Record and a Safeguarding Record. Recording should be concise, factual, and clear. Accident record books are easily available from good

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<sup>13</sup> Specific advice regarding photography is included in Section 5.

stationery shops. A template for the safeguarding record is available [here](#). Please note that Safeguarding Logs in particular may need to be disclosed in certain situations, for instance if a safeguarding concern proceeds to a criminal or family court setting. It is particularly important therefore to observe the standard of recording for Safeguarding Logs recommended in this guidance.

- 2.8.4. All safeguarding records must be securely stored, with access limited to the safeguarding officer and other named individuals e.g. a churchwarden and the incumbent.
- 2.8.5. See the Church of England's Safeguarding Records [Toolkit](#) for further advice regarding recording.

## **2.9. Choirs and Music Activities.**

- 2.9.1. Choirs and music activities involving children and vulnerable adults should be run according to the stipulations outlined elsewhere in this guidance.
- 2.9.2. For specific topics related to bellringing, please see the 'Central Council of Church Bell Ringers: General statement on Safeguarding Children in Towers'. Click [here](#).
- 2.9.3. Music lessons for children are normally arranged through a school or as a private arrangement between parent and teacher. However, if the lessons occur on church premises, for instance using a church organ, the PCC retains responsibility for health and safety in activities carried out on its premises. In these situations the person giving the lesson must complete a Confidential Declaration Form and have a DBS Disclosure if this has not already been done. They should be given a copy of the Code of Safer Working Practice for church officers with children and young people and agree to abide by it.
- 2.9.4. An agreement should be drawn up on church headed paper, which at least one parent should sign, in which the parent gives consent to the teacher teaching their child at the church and accepts this will not be supervised. This should include the provision that the parent understands that from time to time it may be necessary for some physical contact between teacher and student as is appropriate in the context of the particular lesson being taught.
- 2.9.5. This should be signed also by the organist or person giving the lesson and by someone appropriate in the church (e.g. a safeguarding officer, member of the clergy incumbent, church warden). The signed agreement should be retained by the church.

## **2.10. Young People who attend church activities without their parents.**

- 2.10.1. Young people may attend church activities when their parents do not attend the same church. Church services are public events and it is not possible to check everyone who attends, neither is it advisable to turn people away. The specific guidance below is given primarily with a view to church youth events and activities rather than Sunday services. Few hard and fast rules can be given, but the following points may assist:
  - 2.10.2. If a young person aged under 14 attends your church youth activity, this should be with their parents' knowledge and consent. Wherever possible speak to parents directly rather than by using the young person as an intermediary. Even if you feel that a parent is being unreasonable in refusing their child permission to attend, it is ultimately their decision and you should support their right to make it.

- 2.10.3. At 14 and 15 children can consent in their own right to certain things even if their parents object. This may include church attendance, but great care should be taken and in all such circumstances, the advice of the Diocesan Safeguarding Adviser should be sought.
- 2.10.4. For young people of 16 or 17, discuss their circumstances with them and whether their parents know they are attending church. In most circumstances the decision to inform their parents should rest with them. Bear in mind that the young person may have some personal or family difficulty which they may not be willing to disclose and which needs sensitive handling. The young person may also have some special educational or health needs, or may be living independently of their parents. Again, consider these carefully and discuss with your Diocesan Safeguarding Adviser.
- 2.10.5. Try to establish whether the young person is simply attending without their parents' knowledge, or against their parents' objections. If the former, provide information about the group to the young person to take to their parents. If the latter, the situation is likely to be complex; the advice of your Diocesan Safeguarding Adviser should be sought in these rare instances.
- 2.10.6. In all cases, establish the address and contact details for parents, even if the young person is 16 or over and their parents do not know that s/he is attending church. Include these on the register. You should never be in a situation where you need to call a young person's parents or carers and be unable to do so because you do not have contact details to hand. It is important to explain to children why you will need their parents' contact details.
- 2.10.7. Do not include the young person on trips away from the normal place of meeting without explicit parental consent. You should never take a child or young person away on an overnight trip, including 16 or 17 year olds, without the explicit consent of their parent or carer.

## **2.11. Small groups involving young people.**

- 2.11.1. Many such groups will meet in the homes of group leaders. Whilst it may be preferable for the group to meet in the church hall, it is recognised that this is not always possible. Additionally, being hosted in someone's home can be a valuable part of youth group life. As in every situation, sensible safer working practice arrangements should be followed, with particular diligence given to the prohibition against lone working. Two adult leaders should always be present. If the youth group is led by a couple, there should be a third adult leader/helper present. The reason for this is that a primary reason for the 'two adult helper' rule is that adults can keep each other accountable for how they behave around young people. The relationship between a married couple<sup>14</sup> may make such mutual accountability difficult and arrangements to ensure the presence of a third adult are required.

## **2.12. Affiliated Youth Groups.**

- 2.12.1. Sometimes a church or group of churches may set up a youth group as a semi-independent organisation. The Diocesan Safeguarding Adviser should be consulted. Unless the group has been set up as an independent charity, responsibility will usually be with the parent church body.

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<sup>14</sup> This would apply equally if the group was led by two members of the same family, e.g. a father and son.

### **2.13. Special Needs.**

2.13.1. The principles and practice guidelines outlined in this document apply equally for children with special needs. Particular consideration should be given for the increased vulnerability of children with special needs. For detailed advice see the Diocese of Oxford's [guidance](#) document 'Children in Church? Welcome, teaching and worship with children with special needs.'

### **2.14. Drug, Alcohol and Smoking Policies.**

2.14.1. The PCC should set policies appropriate to the kind of event or activity which is being organized. Different arrangements will be needed according to the type of event; for example, a Harvest Supper, where there are many adults and most young people are with their parents, needs different arrangements from a residential stay, where a group of young people is supervised by youth leaders.

2.14.2. If alcohol is sold a licence is required. For the majority of situations a temporary event notice will suffice. These are available from district councils and unitary authorities. Where a licence is granted, alcohol may not be sold to people under the age of 18, nor may they be supplied with it or consume it. There is an exception where the consumption is to be on the premises, where the young person is aged 16 or 17, and is accompanied by an adult and is having a table meal. The only alcohol they are allowed to consume is wine, beer or cider. A person under 18 can work as a waiter or waitress and deliver drinks to the table. For further details consult the local authority Licensing Officer, or your insurance company, or see the Licensing Act 2003 and its associated guidance.

2.14.3. If alcohol is provided but not sold, no licence is needed. However, it would be sensible to consider following the same restrictions as in the guidance, namely no alcohol for people under 18, with the same relaxation for 16 and 17 year olds having meals with an adult. This has the advantage of being consistent with what young people expect elsewhere.

2.14.4. At youth groups and activity events with young people neither adult leaders nor young people should consume alcohol. This also applies on residential trips when adult leaders are not on duty. Adult leaders must act in ways that recognize that they are role models for young people at all times.

2.14.5. Smoking: legal requirements: Smoking is illegal in any enclosed public premises. There is no minimum age limit for smoking, although those under 18 are not permitted to buy tobacco products. Childline produce excellent guidance on young people, smoking and the law which gives further information.

2.14.6. Smoking: good practice. Adults should avoid smoking in the presence of young people. Young people who are smokers should be advised of a designated area away from others. On residential trips it is appropriate to include a question on smoking on the parental consent form to establish parental knowledge of the young person's use of cigarettes.



## 3. Working with Vulnerable Adults<sup>15</sup> – Specific Topics.

The guidance below relates to work in church with adults who are defined as ‘vulnerable adults’. However, some of the principles and guidance offered here relates to all aspects of pastoral ministry in the church.

**3.1. Basic Principles<sup>16</sup>.** Adults who are vulnerable are a valued and valuable part of church life, and should be able to engage in active membership of church communities. Churches should focus not just on the needs these adults have, but also - and indeed primarily - on the abilities and gifts they bring and how they can contribute to the life and fellowship of the church. With this in mind, churches should:

- Create an environment where all people, including those who are vulnerable, are encouraged to participate in and contribute to all aspects of church life;
- Consider how church activities, including public worship, promote and enable the inclusion of vulnerable adults;
- Adopt and publish policies and procedures for the safeguarding of vulnerable adults;
- Work with all adults, especially those who have specific vulnerabilities or who are at particular risk, in ways that empower them to be in control of their own lives and make their own decisions. The underlying principle of the 2014 Care Act, for instance, has been summarised neatly in the phrase: “No decision about me, without me”.

**3.2. Home Visiting:** Visiting adults at home can be a valuable aspect of pastoral care. This will often be done on an informal, neighbourly basis. Such arrangements fall outside of the scope of this guidance, which only applies to ‘formal’ visiting done in the name of the parish church. Visiting at home is especially important for adults who are home-bound, for instance through disability or illness, and can contribute greatly to the quality of their lives. Care must be taken, however, both for the protection of those being visited and for the those doing the visiting. There should be accountability and transparency in the manner in which church officers engage in lone working or visits to homes.

**3.2.1. Good Practice when visiting people at home:**

- Ideally let people you are visiting know in advance that you are going to visit, particularly if it is your first visit.
- If this is a first visit, or if the conversation is likely to move onto sensitive pastoral matters, ensure that the person is aware that

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<sup>15</sup> **Vulnerable adult** – Section 6 of the Safeguarding and Clergy Discipline Measure 2016 defines a ‘vulnerable adult’ as ‘a person aged 18 or over whose ability to protect himself or herself from violence, abuse, neglect or exploitation is significantly impaired through physical or mental disability or illness, old age, emotional fragility or distress, or otherwise; and for that purpose, the reference to being impaired is to being temporarily or indefinitely impaired’.

<sup>16</sup> For clergy, Section 2 of the [Guidelines for Professional Conduct of Clergy](#) contains crucial guidance which should be read alongside this section.



the conversation is confidential, but also what the boundaries of confidentiality are<sup>17</sup>.

- If possible, visit in pairs - again, especially if it is the first visit. However, it is recognised that much pastoral visiting, particularly by clergy, is done alone and this guidance does not place a restriction on that, as long as the other aspects of safer working practice in this guidance are followed.
- Carry some identification on the first visit and be proactive in letting the person see it. This is particularly important for elderly people living alone, who may have other people ('bogus callers') visiting to exploit them in some way. Letting them know that they have a right to see identification does them a great service.
- Consider the risks of the visit. Is the person, or another occupant, volatile or unpredictable? Do they have a dog who does not like visitors? You may not know everything before a first visit but try and find out what you can. (See the Model Risk Assessment [Check List](#) for Home Visiting further guidance).
- Carry a mobile phone and let someone know where you are and when you expect to return.
- Ask the person whether they would like repeat visits, whether and how they would like to be contacted again, and so on. Leave them feeling fully in control of your contact with them.
- Make a note of the visit; store all such notes in accordance with data protection requirements. The note does not need to be extensive, but the date, time of arrival and departure, and any significant observations or points of conversation should be recorded. Let the person you are visiting know that you keep brief records, and always be prepared to show them your notes should they ask.
- If you are asked to make any purchases on behalf of the person, always retain receipts and return both them and any change to the person immediately. Keep a record of any transactions and the reason for them.
- Set appropriate boundaries: be wary of over-promising. If you do not have the ability to meet the needs of the person you are visiting, say that you will try and find suitable help, but avoid getting drawn into a dependant relationship that ultimately disempowers the person you are visiting.
- Take care regarding accepting any gifts other than token items, to avoid misunderstandings or subsequent accusations from the person or their family. If courtesy demands that you accept a small gift, declare it to someone at church, for instance a church warden or the PCC Treasurer, to ensure transparency. If someone wants to make a donation to the church, put it in an envelope, mark it on the outside as a donation and obtain a receipt from the Treasurer.

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<sup>17</sup> In general, you should explain that the conversation is confidential unless what is said communicates that a child or adult is at risk of harm. For more detailed guidance, please refer to [Practice Guidance: Responding to Safeguarding Concerns or Allegations that Relate to Children, Young People and Vulnerable Adults](#).

**3.3. Good Practice Regarding Financial Matters:** It is usually family members who assume this role and it would rarely be appropriate for a church officer to take on this responsibility. If such a request is made to a church officer, it should be discussed with the Diocesan Safeguarding Advisor. It is preferable that if a family member cannot undertake this task, then a Solicitor or trust corporation should do so. The same applies if a church officer in that capacity is asked to be an Executor for a will.<sup>18</sup>

**3.4. Being inclusive towards adults with specific needs.** This section highlights ways in which church can become more inclusive to those with specific needs, such as those arising from disability. As a general principle, it is good practice to ask people with these needs how church can change to become more accessible and to them. It is also helpful to imagine yourself in the position of, for instance, someone with a hearing impairment, and to 'walk through' a Sunday service as if you were them. What things might you have taken for granted about church life that suddenly becomes an obstacle to those with a disability? To aid you in this exercise, some aspects of good practice are outlined below, but please think of these as indicators only; you will need to do the work in your local setting to make your church an inclusive place for all. A guide for further thinking on this subject can be found at this section of the Church of England's [website](#). Further advice for churches can be found at the [website](#) for the Through the Roof charity.

#### **3.4.1. Good Practice Regarding Visual Impairment:**

Reserve seats near the front so the partially sighted person has the option to sit closer to what is going on.

Ensure large print versions are available for songs/hymns and other written material (e.g. bible, news sheets etc.). Print for partially sighted people should be in a easily-readable Sans Serif typeface (e.g. Arial).

The international symbol for visual impairment can be shown on literature and notice boards to indicate what facilities are provided for blind and partially sighted people

#### **3.4.2. Good Practice Regarding Hearing Impairment<sup>19</sup>.**

- Address hearing-impaired people directly, rather than speaking to them 'through' someone who has accompanied them. Ensure that your face and mouth can be seen clearly. Look directly at the person and speak at normal speed and volume with clear lip patterns. Avoid exaggerated lip patterns that are harder to read. Don't speak directly into the person's ear.
- A hearing induction loop should be provided whether you are aware of people using hearing aids or not. It is not always obvious someone has a hearing aid and most people do not like to draw attention to the fact.
- Be aware that background noise can make life very difficult for people who use a hearing aid because it can distort what they are trying to hear. Do not raise your voice if someone is wearing a hearing aid as this too can distort sound.

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<sup>18</sup> It may also be helpful to refer people to the [Money Advice Service](#) if they need assistance with financial matters.

<sup>19</sup> [Action on Hearing Loss](#) and [Hearing Link](#) contain very useful advice on hearing loss which may be helpful in addition to the material in this section.

- Be prepared to write things down if necessary; the important thing is not to give up if communication is difficult. Change/simplify your language if the deaf person does not understand, avoiding jargon.
- The international symbol can be shown on literature or notice boards to indicate that facilities are available for the hard of hearing.

### **3.4.3. Good Practice Regarding Reduced Mobility:**

- Ensure access both to and within your building(s) through the use of level floors or ramps.
- Avoid designating one area for wheelchair users; this unnecessarily draws attention to their disability. Think about a seat being reserved alongside a wheelchair user so that a friend can sit next to them.
- When talking to a wheelchair user it is polite to sit down so that you are on the same level, making eye contact easier. Remember that a wheelchair is part of the user's personal space – so don't lean on it, hold it or attempt to move it/push it unless asked.
- The international symbol can be shown on literature, notice boards and facilities such as toilets to indicate that there is access for those with impaired mobility

### **3.4.4. Good Practice Regarding Learning Disability.**

- Adults with learning disabilities may well have limited or no reading ability so where possible signpost facilities and directions (fire exits, toilets etc.) using images as well as words.
- Offer discrete assistance if people seem to be experiencing difficulties understanding or if they require help with certain instructions. Consider their level of understanding when you are speaking with them.
- Beware of “veneer skills” where someone gives the impression of understanding when they do not.
- Be patient if individuals are noisy or move about when it seems inappropriate. Avoid immediately picking up on the norms of how things are usually done within your place of worship.

3.5. Capacity - Guidance on Making Decisions. We make many decisions every day, often without realising. We make so many decisions that it's easy to take this ability for granted. Some people are only able to make some decisions some of the time. Being unable to make a decision is called “lacking capacity”. A person's capacity to make decisions may be affected by things like learning disability, dementia, mental health needs, brain injury, and physical ill health. Assessing capacity is something that requires specialist training; the guidance below helps you to be aware of the key issues but you will not be expected to attempt any such assessment yourself.

3.5.1. The Mental Capacity Act 2005 (MCA) states that every individual has the right to make their own decisions and provides the framework for this to happen. The MCA is about making sure that people over the age of 16 have the support they need to make as many decisions as possible. The MCA also protects people who need

family, friends, or paid support staff to make decisions for them because they lack capacity to make specific decisions.

3.5.2. The MCA recognises that capacity is decision-specific, so no one will be labelled as entirely lacking capacity. The MCA also recognises that decisions can be about big life-changing events, such as where to live, but equally about small events, such as what to wear on a cold day.

3.5.3. By understanding the MCA you will be able to understand how you may be part of the decision making process for a person. To help you to understand the MCA, consider the following five points:

- Assume that people are able to make decisions, unless it is shown that they are not. If you have concerns about a person's level of understanding, you should check this with them, and if applicable, with the people supporting them.
- Give people as much support as they need to make decisions. You may be involved in this – you might need to think about the way you communicate or provide information, and you may be asked your opinion.
- People have the right to make unwise decisions. The important thing is that they understand the implications. If they understand the implications, consider how risks might be minimised.
- If someone is not able to make a decision, they should be encouraged to seek appropriate advice.
- Find the least restrictive way of doing what needs to be done.

3.5.4. When a person needs help to make a specific decision, the following should be considered before a decision can be made in their best interests:

- The individual needs all the relevant information to make the decision.
- If there is a choice of options, has information been provided on the alternatives?
- The communication needs of the individual must be taken into account, and the information must be presented in a way that makes sense to them.
- Different communication methods must be explored, including obtaining professional or carer advice and support.
- The risks and benefits must be considered for any decision.

## 4. Social Media and Mobile Communications.

**4.1. Basic Principles.** Social media, such as Facebook, Twitter and Instagram, are online platforms that allow users to create, rather than just consume, online content. Typically they allow users to upload photographs, daily updates, comments, and so on. Social media usage is widespread, particularly amongst younger adults and children: for many young people the distinction between the 'online' and 'offline' worlds is an artificial one. As some have pointed out, if the church does not engage with young people on social media, then the church will not engage with a major aspect of their lives.

**4.2. Other Resources.** The world of social media changes rapidly; by the time guidance is in-print it can be out-of-date! This section provides some general pointers, but it is highly recommended that readers familiarise themselves with the following online resources which provide more detailed advice which is regularly updated:

- [Thinkuknow](#)
- [Parentzone](#)
- [Parents Protect – Internet Safety](#)
- [ChildNet International](#)

**4.3. Don't be too restrictive!** The evidence suggests<sup>20</sup> that taking a highly restrictive approach to social media usage with young people is unhelpful, as they will usually find a way to use it anyway and may end up taking more risks because their usage is already 'illicit'. The evidence also indicates that the majority of young people are capable of identifying risks in the online world and avoiding them. It is important to avoid treating the world of social media as 'scary' and of seeing dangers everywhere; for many young people, their social media use is a positive and enjoyable aspect of their social lives.

**4.4. Best Practice.** However, sensible precautions should be taken in the use of social media within a Church context. In many ways, these precautions are simply online versions of safe practice in the offline world:

- Avoid 'lone working' in the online world: Practically, this means avoiding one-to-one online chat (e.g. direct messaging) between adults and young people.
- Maintain appropriate boundaries in the online world: Just as in the offline world, it is important to keep a distinction between our private lives and our work within church, and to pay particular attention to the dynamics of power and influence as discussed in Section 1.

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<sup>20</sup> For further reading on this, a good place to start is by reading [A Shared Responsibility: Building Children's Online Resilience](#) by Virgin Media and The Parent Zone.

- Do not use personal social media accounts to contact children: The simplest way to observe the above two precautions is to avoid having leaders and young people as 'friends' on social media (e.g. Facebook). It is far preferable to have an official account for the group in question (such as 'St Andrew's Anywhere Youth Group'), and to ask young people to 'like' that page. Any news about group events or anything else can be posted on that page. More than one leader should have access to this page, providing for accountability and transparency. Conversations between leaders and young people should happen in the public section of these pages (such as the 'wall' or in comments under posts) where everyone can see them, rather than via direct messages.
- Behave in the online world as you would offline: Simply put, if you would not say it offline, do not say it online! This includes posting links to offensive or otherwise inappropriate content, making comments about someone's appearance that could be interpreted as either sexual or offensive, or 'liking' inappropriate content on social media.
- Treat online 'consent' the same as offline 'consent': You will need the consent of the individual and/or their parents to use and store photographs, to retain any information relating to them online, and so on. (See the next Section for further guidance regarding the use of images). It is a good idea to make their parents aware of the social media that your church uses and ensure that you have their consent to their child's usage (depending on the age of the child – older children can consent in their own right).

**4.5. Mobile Devices.** If a church employee is required to use a mobile telephone in the course of their work, then as far as is practicable they should be supplied with a phone dedicated for work purposes. This may also be the case for certain volunteers, such as youth group leaders. This allows for the phone to be switched off outside 'working hours', and for usage to be accountable. This means that the church officer's personal number can remain private. Texts or conversations that raise concerns should be saved and passed on to the local nominated safeguarding officer. If a church employee is provided with a 'work mobile', they should be required to sign to say that they will use it only in accordance with the guidance in this document.

## 5. Photographs and children.

### 5.1. Photograph of children: consent.

- 5.1.1. Photography of children and young people involved in church activities can be very positive and bring useful publicity, but there are some important issues to note. The issues are the same for still photographs, digital images or films. For convenience they are all referred to as images.
- 5.1.2. Images count as sensitive personal data under the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). As with all such data, they should only be used with the consent of the person in the image.
- 5.1.3. The list below provides a simple point of reference for gaining consent regarding the use of images of children
  - Children under the age of 13: consent should be gained from their parents;
  - Children aged between 13 and 16: consent should be gained from parents and the children themselves;
  - Children aged 17: consent should be gained from the children themselves.
- 5.1.4. Please note that the above list shows 'all you need to do', rather than 'all you might want to do'. It would be good practice to ask a child younger than 13 before you use their photograph, and to inform the parents of a 17 year that their child has agreed to the use of their image.
- 5.1.5. Let parents (and children over 13: see above) know how, where and in what context an image may be used – for example, on a public website, through social media or in a printed resource.
- 5.1.6. Consent is not needed if children appear in a wide-angle group photograph in a public space (for instance, a photograph of the church fete). A church is not a public place in this sense but there may still be occasions when it would not be reasonable, practical or proportionate to secure consent for every individual child who appears in the photograph. In these circumstances, organisers should make clear to all participants and parents that these kinds of images will be taken, and for what purposes. For instance, if the event is a church service, nativity play or similar, then a verbal notice can be given out at the beginning for the leader of the service or event, asking that any parent who objects to images being made of their child should either remove their child from view of the camera or approach the leader afterwards to ensure that any image they object to is not used. Consent can also be implied; if an activity leader invites people to be part of a group photograph, then those who gather for the photograph have given their consent by virtue of having done so.
- 5.1.7. Complete a parental consent [form](#) for use of images of children, possibly as part of the process for registering and consenting the child's participation in the activity or event. See model registration [template](#).



- 5.1.8. Leaders of activities have a responsibility to put in place arrangements to ensure that any 'official' photographers can identify (or be informed about) which children should not be subject to close-up photography.

## 5.2. Best Practice with Photography:

- Think carefully before taking any images showing children and young people on your website, social media or other publications. Consider what the images will be used for and whether consent will be required (see below);
  - Do not supply full names of children along with the images, unless:
    - It is considered necessary e.g. celebrating a performance or achievement;
    - the child and parent(s) or carer(s) have consented;
- Only use images of children in suitable dress or kit, being particularly mindful of some activities (e.g. swimming) which involve partial states of dress. Additionally, avoid pictures of children in school uniform where the name of the school is visible;
- Keep images of children securely:
  - Hard copies of images should be kept in a locked drawer;
  - Electronic images should be in a protected folder with restricted access;
- Images should not be stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones. If such storage is unavoidable, the images should be kept in a password-protected folder or on a device protected with a code or some other secure method of access such as fingerprint identification.
- Avoid, if possible, using any personal equipment to take photos and recordings of children on behalf of the church<sup>21</sup> – use only cameras or devices belonging to your organisation. This may not always be achievable but it is best practice. If personal equipment has to be used for church purposes, delete the photographs of individual children once they have been used for the purpose for which they were taken;
- For guidance on the Data Protection Act and other privacy regulations, visit the Information commissioner's office (ICO) [website](#).

**5.3. Photography/filming by parents and others at activities/events.** There will be circumstances in which parents and other attendees at activities want to take photographs, for instance concerts, plays, and choirs. For youth events in particular, many young people will have a camera on their mobile phone and will regularly post images of themselves and their friends on social media. It will be important in the planning stages of events to:

- Decide on the activity approach to photographs/filming for 'attendees';

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<sup>21</sup> This does not apply when, for instance, parents are taking photographs of children's events for their own use.



- Clarify and promote the photography rules for the event to all church to all participants;
- Warn parents, attendees and young people that there can be negative consequences to sharing images linked to information about their own or other people's children on social media – and care should be taken about 'tagging';
- Children who are in care should not be photographed as this could put them at risk;
- Make sure that there are procedures to respond to and manage any concerns arising, including a named person to report any concerns to.
- For young people, you may wish to consider a discussion amongst your group regarding how they wish the images they take of each other to be used, and what restrictions they feel should be observed. This will be more meaningful and effective with young people than a set of rules imposed by adult leaders.

**5.4. Sexting<sup>22</sup>** Sexting is 'when someone shares sexual, naked or semi-naked images of videos of themselves or others, or sends sexually explicit messages'. The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and the Diocesan Safeguarding Adviser and the Police should be informed immediately.

**5.4.1. Responding to sexting incidents involving young people:** Refer the incident to the Diocesan Safeguarding Adviser as soon as possible who will assist in managing the response according to best safeguarding practice. These can be difficult situations which need skilled advice to handle properly. An immediate referral to police and/or children's social care will be made if:

- The image(s) of the young person have been shared by an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to learning difficulties);
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The image involves sexual acts and any person in the image is under 16;
- There is reason to believe the young person is at immediate risk of harm owing to the sharing of the image, for example, the young person is presenting as suicidal or self-harming.

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<sup>22</sup> See the NSPCC [guidance on sexting](#), from where the definition in this section is taken.

## 6. Photography Guidance for Adults.

When an adult is the main subject or would be recognised, you should:

- 6.1. Seek consent from the adult, letting them know how their image will be used. As with children, consent can be implied. If they lack capacity to consent do not use their image.
- 6.2. Remember that consent for use of the photograph or film is only for that one purpose and should not be reused in any other promotional event without further consent.
- 6.3. Some organisations provide specific activities targeted at people with care and support needs. If you wish to take photographs or will be filming people with care and support needs there are additional issues to consider:
  - Adults must be able to consent to their image being used;
  - Legally, the only person who can offer consent for the use of their image is the adult themselves. Family members such as adult children, parents, spouses or siblings and support workers/ personal assistants should not be approached to sign consent forms for adults;
  - Information about how the images will be used should be provided to an adult in an accessible format, using for example, easy-to-read language or pictures;
  - If you have any concerns that an adult does not have the capacity to give consent to photography or filming, or understand that photographs or films are being taken during an activity, you must discuss this with them, including if appropriate, any support person or personal assistant for the adult;
  - If after this conversation you feel that the adult still cannot give consent then do not use their photograph.

## 7. Transport.

- 7.1. Specific guidance regarding lifts is provided below, but please note the guidance on lone working as it relates to the giving of lifts, covered in section 4.4.
- 7.2. This guidance only applies where transport has been formally organised on behalf of the church. It does not apply to private arrangements between churchgoers, including the informal giving of lifts to and from church events. For the purpose of this guidance the driver is called an approved driver. They must be recruited according to the Safer Recruitment procedure. This will include the requirement for a satisfactory DBS disclosure if the driver is carrying children or young people, or providing transport for children or vulnerable adults to or from health or social care appointments.
- 7.3. An approved driver must give a signed undertaking that s/he will comply with the parish safeguarding policy, the Code of Safer Working Practice, and specific guidance regarding transport. They should also be required to demonstrate that they have a suitable driving license and adequate insurance. A Model Volunteer Driver [Agreement](#) is included at this link.
- 7.4. Children and young people may not be taken out in transport without the prior consent of their parents or carers.
- 7.5. All those who drive children or vulnerable adults on behalf of the church should normally be over 25 and should have held a full current driving licence for over two years.
- 7.6. Any person providing or seeking to provide transport on behalf of church who has an endorsement of 6 points or more on their licence must inform the parish safeguarding officer. Any driver who has an “unspent” conviction for a drink driving offence or for Dangerous Driving or Racing on the Highway may not transport children. The parish safeguarding officer should consult with the Diocesan Safeguarding Adviser regarding this person’s suitability to provide transport on behalf of church.
- 7.7. It is compulsory for passengers aged over 13 years to wear a safety belt if provided when travelling in a minibus, bus or coach. The legislation that requires baby/child seats and booster cushions to be used in cars does not apply to minibuses, buses and coaches; commercial companies do not have to provide this equipment.
- 7.8. When using a minibus, whether owned, hired or borrowed, all drivers must hold the correct permit on their driving licence or take the appropriate driving test. Drivers with entitlement to drive cars prior to 1 January 1997 (shown as group A, B for automatics on an old-style licence or as category B and D1 not for hire or reward on a new style licence) can drive a minibus provided they are over 21 and under 70, the minibus has a maximum of 17 seats including the driver’s, and is not being used for hire or reward.
- 7.9. This minibus entitlement remains valid in the UK and on temporary visits abroad until the licence is next renewed. When this happens, the minibus entitlement can only be issued by making a special application which involves meeting higher medical standards. Minibus entitlement is normally renewed for 3 years.

- 7.10. If minibus entitlement is not renewed, or the car licence was obtained after 1 January 1997, the driver may drive a minibus with a maximum of 16 passenger seats provided:
- It is driven on behalf of a non-commercial body for social purposes but not for hire or reward;
  - the driver is aged over 21 and under 70 years;
  - the driver has held a car licence (category B) for at least 2 years;
  - the driver is providing his/her service on a voluntary basis; and the minibus maximum weight is not more than 3.5 tonnes excluding any specialist equipment for the carriage of disabled passengers;
  - When driving a minibus under these conditions, no payment must be received other than out of pocket expenses; no trailer can be towed; and minibuses may only be driven in the UK. If payment is needed, for example to cover the costs of the trip as a whole, then the driver will need a permit. This can be obtained from the [Community Transport Association](#).
- 7.11. Drivers aged 70 or over will need to make a special application which involves meeting higher medical standards.
- 7.12. Regular drivers of minibuses should be encouraged to take a MiDAS (Minibus Driver Awareness Scheme) test, organized by the Community Transport Association U.K. (CTA) which promotes a nationally recognized standard for the assessment and training of minibus drivers. It is a membership based scheme that has been designed to enhance minibus driving standards and promote the safer operation of minibuses.

## 8. Hire of Premises.

- 8.1. When letting parish buildings to third party groups the Church Body concerned should take all reasonable steps to ensure that the group's proposed activities do not present a safeguarding risk.
- 8.2. In addition to its importance in meeting the Church's commitment to safeguarding, this is required to avoid the possibility that, if an incident occurs, the Church Body's insurance cover in relation to public liability would not be affected.
- 8.3. To that end the Church Body should include terms in the letting agreement to the effect that:
  - the third-party group will take all reasonable steps to ensure that no person is at risk of harm in the course of the group's activities (including by conducting its activities in accordance with best safeguarding practice); and
  - the activities of the group are covered by an insurance policy providing public liability cover in respect of any claims arising out of the group's activities in relation to children and vulnerable adults taking part in its activities; and
  - the group hiring the premises have a safeguarding policy that is the equivalent to the parish's policy. If they do not, then they should be invited to sign up to the parish's safeguarding policy, including the Code of Safer Working Practice, as part of the letting agreement.
  - The letting agreement should include a clause to the effect that any failure on the part of the third-party group to comply with the above three points would constitute a breach of the agreement and may, depending upon the severity of the failure, result in the agreement being terminated.
- 8.4. If a third-party group is unwilling to accept such terms the Church Body should decline to allow it to use the premises.