

Freedom Church

Safeguarding Policy

November 2020



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1 Organisation and Activities

Organisation: Freedom Church
Charity number: 1161926
Address: The Forge, 161 Holme Lacy Road, Hereford, HR2 6DG
Telephone: 0330 0439 438
Email: hello@freedomchurch.cc
Senior Leader: Pastor Gary Snowzell
Safeguarding Lead: Jim Dyson - jim.dyson@freedomchurch.cc

At Freedom Church we believe that 'everyone matters', and are committed to building relevant Church for people of all ages and backgrounds. On a typical Sunday across our locations we have Freedom Kids, which is for children aged 4 months to 11 years. We also run Zeal which is our youth ministry for high school students. At Freedom Church, we're passionate about community and therefore encourage our members to get involved in any way they can, whether that's attending midweek groups or volunteering; this does not exclude those with care/ support needs.

2 Our Commitment

As trustees of Freedom Church, we recognise the need to provide a safe and caring environment for children, young people and adults. We acknowledge that children, young people and adults can be the victims of physical, sexual and emotional abuse, and neglect.

We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to "all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status". We also concur with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from "all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child."

As trustees we have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding.

We undertake to:

- endorse and follow all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above.
- provide on-going safeguarding training for all our workers and regularly review the operational guidelines attached.
- support the Safeguarding Lead and Safeguarding Coordinators in their work and in any action they may need to take in order to protect children and adults at risk.



3 Safeguarding

Safeguarding is the action that is taken to promote the welfare of children and adults at risk, and protect them from harm.

Definition of a child:

- International - *The United Nations Convention on the Rights of the Child* defines a child as every human being below the age of 18 years unless under the law applicable to the child, majority [adulthood] is attained earlier.
- England - A child is anyone who has not yet reached their 18th birthday.
- Wales and Northern Ireland - A child is a person who is under 18.
- Scotland - The definition of a child varies according to the legal circumstances. Part 1 of the national guidance for child protection in Scotland explains that a child is generally defined as someone under the age of 18.

Definition of an adult at risk:

- England - A person aged 18 years or over, who may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- Wales - A person who is experiencing or is at risk of abuse or neglect, has needs for care and support (whether or not the authority is meeting any of those needs), and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- Scotland - Those aged 16 years and over who are unable to safeguard their own wellbeing, property, rights or other interests and are at risk of harm and because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

There are four categories of abuse as defined by Working Together to Safeguard Children 2018:

- Sexual Abuse
- Physical Abuse
- Emotional Abuse
- Neglect Abuse

There are 14 categories of abuse experienced by adults:

- Self-neglect
- Modern slavery
- Domestic abuse
- Organisational
- Physical
- Sexual
- Financial or material
- Neglect and acts of omission
- Emotional or psychological
- Cyber bullying
- Forced marriage
- Mate crime
- Radicalisation

4 Training

The trustees are committed to ongoing safeguarding training and development opportunities for all paid and voluntary workers, developing a culture of awareness of safeguarding issues to help protect everyone. All our workers will receive induction training and undertake additional safeguarding training on an annual basis.



The trustees will also ensure that children and adults at risk are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

5 Safer Recruitment

The trustees will ensure all workers will be appointed, trained, supported and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written job description and person specification for the post
- Those applying have completed an application form and a self declaration form
- Those shortlisted have been interviewed
- Safeguarding has been discussed at interview
- Written references have been obtained, and followed up where appropriate
- An appropriate disclosure check has been completed, where necessary
- Qualifications where relevant have been verified
- A suitable training programme is provided for the successful applicant
- The applicant has completed a probationary period
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns

[See Freedom Safer Recruitment procedure]

6 Management of Workers

As trustees we are committed to supporting all workers and ensuring they receive support, training and supervision. All workers have been issued with a code of conduct which includes information about working with children, young people and adults at risk, and can be found in the appendices to this policy.

[See Freedom Church code of conduct]

7 Working Safely

As an organisation working with children, young people and adults at risk we wish to operate and promote good working practice. This will enable workers to run activities safely, develop good relationships and minimise the risk of false or unfounded accusation.

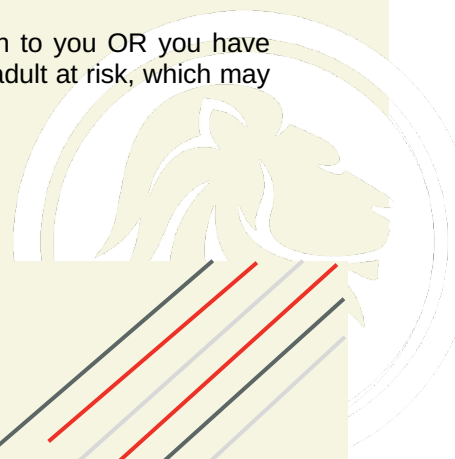
As well as a general code of conduct for workers we also have specific good practice guidelines for every activity we are involved in and these are included in the appendices.

[See Freedom Church safer working practice guidance]

8 Responding to Concerns

Where a child or where an adult at risk has disclosed concerning information to you OR you have witnessed or had reported to you an incident or complaint involving a child or adult at risk, which may be considered abuse or poor practice.

[See Freedom Church concern reporting process]



9 Pastoral Care

The trustees are committed to offering pastoral care, working with statutory and voluntary agencies as appropriate, and support to all those who have been affected by abuse who have contact with or are part of the church.

10 Managing those who pose a risk

When someone attending the church is known to have abused children, is under investigation, or is known to be a risk to adults at risk; the leadership will supervise the individual concerned and offer pastoral care, but in its safeguarding commitment to the protection of children and adults at risk, set boundaries for that person, which they will be expected to keep. These boundaries will be based on an appropriate risk assessment developed in partnership and consultation with appropriate organisations.

11 Working in Partnership

The diversity of organisations and settings means there can be great variation in practice when it comes to safeguarding children, young people and adults. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse.

We therefore have clear guidelines in regards to our expectations of those with whom we work in partnership, whether in the UK or not. We will discuss with all partners our safeguarding expectations and have a partnership agreement for safeguarding. It is also our expectation that any organisation using our premises, as part of the letting agreement will have their own policy that meets our own safeguarding standards.

We believe good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with children and adults and to all those with whom we work in partnership. This safeguarding policy is just one means of promoting safeguarding.

There will be occasions where Freedom Church review and report concerns to social care and or police and they will determine primacy of the investigation and provide relevant advice to the safeguarding coordinator regarding their role.

12 Adoption of this Policy

The trustees of Freedom Church have formally accepted this policy, including its appendices.

Signed by:

Appendix

1 Roles and Responsibilities

Safeguarding children and adults at risk is the responsibility of all but as specified in legislation and national guidance and to ensure the primacy of safeguarding within organisations, there are certain required and designated roles.

Trustees

Working Together to Safeguard Children 2018 (Department for Education) states:

Like other organisations and agencies who work with children, they [charities] should have appropriate arrangements in place to safeguard and protect children from harm. Many of these organisations and agencies as well as many schools, children's centres, early years and childcare organisations, will be subject to charity law and regulated either by the Charity Commission or other "principal" regulators. Charity trustees are responsible for ensuring that those benefiting from, or working with, their charity, are not harmed in anyway through contact with it.

Safeguarding and protecting people for charities and trustees (Charity Commission) states:

Protecting people and safeguarding responsibilities should be a governance priority for all charities. As part of fulfilling your trustee duties, you must take reasonable steps to protect people who come into contact with your charity from harm. This includes people who benefit from your charity's work, staff, volunteers. It may also include other people who come into contact with your charity through its work.

Directional Leadership Team

The role of the Directional Leadership Team (DLT) is vital because it has key responsibilities within the organisation. With regard to safeguarding, these responsibilities include:

- Actively supporting safeguarding principles
- Knowing what the safeguarding policy says and endorsing it
- Ensuring adequate support is given to the safeguarding leads and co-ordinators
- Setting and maintaining a safer culture

The relationship between the Trustees, DLT, safeguarding lead and the safeguarding coordinators is crucial. It is important that DLT never try to deal with safeguarding issues independently, and that they give the safeguarding lead and co-ordinators their full support.

Safeguarding concerns within Freedom Church can be emotionally and spiritually demanding. Whilst confidentiality is important, it is equally important that the safeguarding lead and co-ordinators also receive support. This is something that the DLT should understand and agree to provide.

Safeguarding Lead

The safeguarding lead (SL) is an individual whose responsibilities include:

- Ensuring that Freedom Church's safeguarding responsibilities are met.
- Overseeing, implementing and monitoring safeguarding arrangements.
- Promoting a positive culture of safeguarding across Freedom Church.
- Ensuring good communication between trustees, DLT and safeguarding coordinators.
- Establishing an effective reporting framework for the trustees.
- Ensuring that safeguarding is core to strategic and operational planning.
- Ensuring the adoption, implementation and auditing of safeguarding policy.
- Ensure that contracted providers and partners are quality assured for their safeguarding arrangements.

- Ensure that there is a programme of training and mentoring to support those with responsibility for safeguarding.
- Working in partnership with other groups including commissioners/ providers, local authorities and police to secure high quality, best practice in Safeguarding Children for children.
- To ensure that serious incidents relating to safeguarding are reported immediately and managed effectively.
- Support Safeguarding Coordinators in responding to safeguarding concerns at their respective locations. Keeping detailed, accurate records, either written or using appropriate secure online software, of all concerns about a child or adult even if there is no need to make an immediate referral.
- Liaising with the Local Authority and work with other agencies and professionals in line with Working Together to Safeguard Children.

Safeguarding Coordinator

Every Freedom Church location must designate a safeguarding coordinator who is responsible for the local implementation of the safeguarding policy and responding to concerns. The safeguarding coordinator will oversee the safeguarding of children and adults at risk, unless the appointment of separate coordinators is considered to be more beneficial.

The safeguarding coordinator's responsibilities include:

- Owning safeguarding in their campus, ensuring policies and procedures are followed.
- Acting as a source of support and expertise in carrying out safeguarding duties.
- Encouraging a culture of listening, taking account of children's and adults' wishes and feelings.
- Ensuring they are appropriately trained with updates every two years, and refreshing their knowledge and skills at regular intervals, but at least annually.
- Organising safeguarding inductions and annual training for all workers, and maintaining training records.
- Referring a child or adult to Children's/ Adult Services if there are concerns about possible abuse.
- Acting as an advocate on behalf of children and adults in need of protection.
- Regularly informing the designated safeguarding lead on good practice issues.

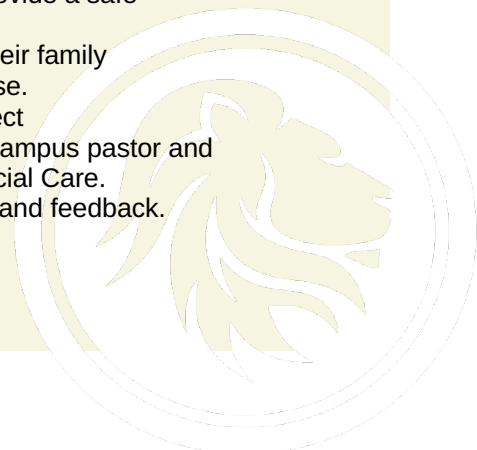
Deputy Safeguarding Coordinator

Each location should appoint a deputy safeguarding coordinator who is trained to the same standard as the safeguarding coordinator and, in the absence of the coordinator, is equipped to carry out the functions necessary to ensure the ongoing safety and protection of children and adults at risk. The deputy may support the safeguarding coordinator with key safeguarding functions and, in the event of the long-term absence of a coordinator, will assume all of the functions above.

All Workers

All workers, whether paid or voluntary, are expected to:

- Understand that it is everyone's responsibility to safeguard and promote the welfare of children and adults at risk, and that they have a role to play in identifying concerns, sharing information and taking prompt action.
- Consider what is in the best interests of a child or adult at risk, and provide a safe environment.
- Be alert to changes in the behaviour of a child or an adult at risk, or their family circumstances, and recognise that change can be an indicator of abuse.
- Know how to respond to a child or adult who discloses abuse or neglect
- Refer any safeguarding concerns to the safeguarding coordinator or campus pastor and where there is an immediate risk, to the police or Children's/ Adult Social Care.
- Provide the safeguarding coordinator with safeguarding observations and feedback.



2 Definitions and Signs of Abuse

What is Child Abuse?

Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

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

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Signs and indicators

Children and young people are reluctant to tell someone when they are being abused, so it is essential that every adult is aware of the possible signs and indicators that a child and young person's welfare or safety is being threatened. However, there is rarely a clear sign and you may often have to piece together various snippets of information and rely on your instinct that something does not seem quite right. Never allow a child or young person's disability or cultural difference to explain away concerns.

You may have one piece of information that, when added to that of others, forms a clear picture of abuse. This is often compared to fitting pieces of a jigsaw together. Only when you have a few pieces can you start to see the true picture. Remember, it is not your job to decide whether or not a child or young person is being abused - however it is your responsibility to share your concerns.

Adults and Abuse

Freedom Church has a duty to refer any concerns they may have about an individual, group or an adult who works with adults who may be vulnerable or at risk of harm.

In the UK, the Care Act 2014 provides a useful list of different categories of abuse that adults may be subjected to these are:

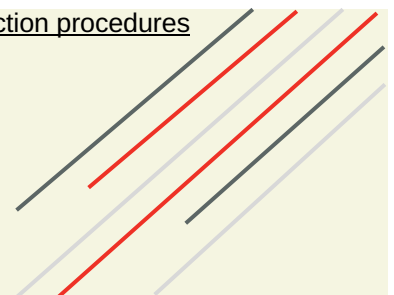
- Physical abuse– including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Domestic violence– including psychological, physical, sexual, financial, emotional abuse; so, called 'honour' based violence.
- Sexual abuse– including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- Psychological abuse– including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- Financial or material abuse– including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- Modern slavery– encompasses slavery, human trafficking, forced labour and domestic servitude.
- Discriminatory abuse– including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- Organisational abuse– including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home.
- Neglect and acts of omission– including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
- Self-neglect– this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

National Guidance

Children:

- NSPCC- <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/>
- Department for Education (DfE) (2018) Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children (PDF). London: HM Government.
- Department for Education (DfE) (2015) What to do if you're worried a child is being abused: advice for practitioners (PDF). London: HM Government.
- Scottish Government (2014a) National guidance for child protection in Scotland (PDF). Edinburgh: Scotland.
- All-Wales Child Protection Review Group (2008) All Wales child protection procedures

Adults:



- Ann Craft Trust- <https://www.anncrafttrust.org/resources/safeguarding-adults-legislation/>
- www.gov.uk/government/publications/care-act-2014-statutory-guidance-for-implementation

3 Safer Recruitment

Most people working with children, young people and adults at risk are dedicated individuals who want the very best for those in their care. However, we cannot assume that it is appropriate for someone to be involved just because they are willing and known to us.

Our safer recruitment process includes the development of a job description, completion of an application form, an interview, taking up references and a disclosure check, as well as the applicant's agreement to abide by Freedom Church's safeguarding policy. (see separate guidance for volunteers) This process is crucial in preventing unsuitable or dangerous individuals gaining access to children, young people and adults at risk.

Operating a safer recruitment process sends a powerful message to parents/carers, children, adults at risk and visitors, as well as those intent on harm.

Every parent, carer or family member has the right to expect the same standards of recruitment and professionalism irrespective of whether an individual is paid or works voluntarily. A potential volunteer's willingness to engage with the safer recruitment process shows that he or she takes safeguarding seriously. A major benefit of robust safer recruitment practices is that they will deter many who are unsuitable from applying in the first place.

Step 1 - Job description or role profile

Every applicant is given a clear and up-to-date job description or role profile (outlining the role and responsibilities), a person specification (specifying skills, qualities, experience, knowledge and/or qualifications required), as well as details of support and training that will be provided.

Step 2 - Application form

A standard application form is used to ensure that everybody provides the same information, making it more difficult to hide relevant details, and assisting with shortlisting (if undertaken).

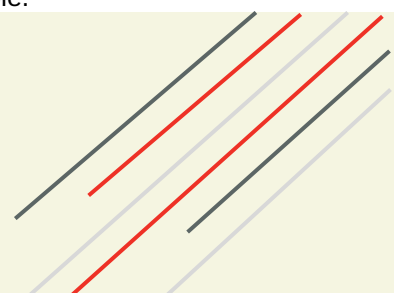
The form asks for the applicant's full name, previous names or aliases, their date of birth, current address, employment history and contact details of two referees. Applicants must also provide a statement containing the reason for applying for the position, personal qualities and experience relevant to the post (which should reflect the criteria in the job description or role profile and the person specification).

The form is a source of information about previous work experience and gaps in employment that may be significant. It also states that Freedom Church reserves the right to make any character enquiries considered necessary, for example from a previous church or employer.

Step 3 - Self-declaration form

A self-declaration form, which includes consent to a disclosure check, should also be completed by the applicant. It requests details of any police warnings, reprimands, cautions, convictions, bind-overs or other causes for concern such as investigations made by the police, children's social care, adult social care or relevant regulatory bodies. This information is likely to be revealed in a disclosure check anyway later on, so the applicant's willingness to declare it beforehand gives an indication of their honesty. It also means the process can be halted at an early stage if they are unsuitable.

Step 4 - References



This part of the process gathers information about the applicant, which can provide useful insights into their experience, attitudes, motivation and character. It is best practice to take up references for all shortlisted applicants before interview so that the information supplied can be addressed and, if necessary, form part of the recruitment decision.

At least two references should be obtained in most cases. For a paid position, ideally at least one reference should be from the applicant's current or previous employer (if he or she is not currently working). The reference should be requested using our standard template so that the same information is gathered about all applicants. The job description or role profile and person specification should also accompany the reference request. The referee will be asked if they are aware of anything that might give rise to concern, and about the applicant's attitude towards safeguarding. Any information given should be compared with information provided by the applicant.

Step 5 - Interview

The interview should generally be conducted by at least two people with leadership or management responsibilities within Freedom Church, one of whom will directly supervise the person who is appointed. There may, however, be some circumstances where a single interviewer might be appropriate.

The application form is a good place to start at an interview. Interview questions should relate specifically to the tasks of the position and be broadly reflected in the criteria from the person specification. Additional questions about an applicant may be asked, such as his/her experience, details that they have given on the application form, or information provided by a referee, provided it is relevant to the position applied for.

It is important to remember that the interview is an opportunity to get the best from people rather than to catch them out. It is also a good opportunity to ask specific questions about the applicant's attitudes towards and understanding of safeguarding.

Step 6 - Decision

A decision as to whether or not to appoint an applicant should be based on all the information gathered, including experience, ability, suitability and motivation for wanting to work with children, young people or adults at risk. It should not be based on external factors such as the urgency of need or the immediate availability of the applicant. An assessment of each applicant interviewed may then be made, enabling leaders or managers to arrive at a decision to appoint the applicant who gave greatest confidence in their ability.

If there are legitimate concerns about an applicant, it is best not to appoint. This minimises the risk of placing people at risk of significant harm. When the decision has been made about offering the position, any offer made should be conditional upon receipt of satisfactory references and checks.

Step 7 - Disclosure check

Once a decision has been made, a disclosure check must be carried out on the successful applicant. The check will reveal any information held on central police databases such as cautions and convictions and their inclusion on government lists that bar an individual from working with children, young people or adults at risk.

Freedom Church operates a procedure for dealing with concerns resulting from information revealed by the check (a blemished disclosure). This involves completing a risk assessment for applicants with blemished disclosures where the offences do not automatically bar them from working with children, young people or adults at risk.

If an applicant has lived outside of the UK for more than six months at any time in the last three years, they will also be required to provide a criminal records check from each country, obtained no more than 30 days before their departure. Guidance relating to overseas criminal records checks is available from [GOV.UK](https://www.gov.uk).

In circumstances where an individual has supported an overseas Freedom Church and their service is un-interrupted between departing and returning to the UK workers should ideally provide an overseas police check or certificate of good character. In exceptional circumstances where this is not possible due to local restrictions, the relevant Campus Pastor will be required to provide a reference for the worker validating their continued service and good character.

If however there is a break in service during this period e.g. they go on independent travels existing arrangements should apply, likewise if the individual was not part of Freedom Church moved to a campus then they will require an international check and UK DBS.

Step 8 - Induction

An applicant for working with children, young people or adults at risk will have already received a basic level of safeguarding training and will have signed the Code of Conduct before working in their previous role within Freedom Church; as this is mandatory for all workers regardless of their position or area of work. The successful applicant will be required to watch the 'Advanced Safeguarding Training' video and read through the Safeguarding policy before actively working in their new role.

Managing safer recruitment

Freedom Church's safer recruitment process is managed using Rock. This ensures that all necessary steps are taken, an audit history is maintained, and decisions are communicated clearly. The process may be initiated by campus pastors, Kids and Zeal pastors, and safeguarding coordinators.

Code of Conduct

This code of conduct sets out standards of behaviour expected of all Freedom Church workers. As a volunteer, or a member of staff, you are an ambassador of Freedom Church's vision and DNA, and as such your conduct should be consistent with our objective of connecting anyone anywhere to a life-changing relationship with Jesus.

We want and expect all to serve with excellence, lead with passion and interact with honour. As a result of your desire to serve with us, we expect certain behavioural standards.

If you are working with children, young people or adults at risk, we expect you to have a good working knowledge of our safeguarding policy, online safety policy and associated practice guidance, and to adhere to the conduct outlined in those documents.

We're all on a journey, but we should be taking steps towards a life that reflects God's heart, standards and best for us. While we're committed to supporting people pastorally in every situation, Freedom Church has definite standards of behaviour and conduct expected of all its workers.

As a Freedom Church volunteer you are expected to:

- Be on time and honour commitment to others
- Treat everyone with respect and dignity
- Behave in a responsible manner and in accordance to our DNA and values
- Follow Freedom Church's policies and procedures and attend required training

As a Freedom Church volunteer you are expected to not:

- Engage in any criminal activity or illegal drug misuse or alcohol abuse
- Become involved in situations where you may be put in a compromising situation including certain lone working situations, social media contact, sharing personal details or inappropriate contact with children or adults at risk
- Perform a role in which you are unsuitable or barred from
- Engage in activities which leads to a breach of trust between Freedom Church and the worker
- Engage in sexual activity outside of Biblical standards
- Disclose confidential information

For the protection and support of everyone, we expect you to report any concerns that you may have about another worker's behaviour to your immediate leader/manager, or in the case of a safeguarding concern, your local safeguarding coordinator. If your leader/manager is the source of the concern, it should be shared with their leader/manager.



Safer Working Practice

We are developing practice guidance which will support workers to run activities safely, develop good relationships and minimise the risk of false or unfounded accusations.

The following areas have been identified as priorities for guidance development:

- General guidelines (all activities)
- Gifts, rewards and favouritism
- Adult to child ratios
- Working safely with disabled children, young people and adults at risk
- Intimate care
- Challenging behaviour
- Unexpected attendance at activities
- Parents/carers staying with children's groups
- Off-site visits
- Transportation
- Residential activities
- Filming and taking photographs
- Social media and phone use

General Guidelines

Volunteers within Freedom Church should wear either lanyards or t-shirts stating which team they are serving on while they are volunteering.

Anyone volunteering in Freedom Church in any capacity has to go through the 'safer recruitment process' and be subject to a DBS check if they wish to work with children, young people or adults at risk.

All volunteers will receive safeguarding training when they join a volunteering team and are subject to further training depending on their role and responsibilities. All leaders and volunteers working with children, young people or adults at risk should be familiar with the Freedom Church safeguarding policy and procedures.

Gifts, Rewards & Favouritism

The giving of gifts or rewards to children, young adults or adults at risk can be acceptable in certain situations to support positive behaviour or recognise an achievement, but should be done with wisdom and care. The giving of gifts, such as a reward for a game or activity, is acceptable within a wide group of children, whilst giving to an individual child or young person will only be done with the agreed knowledge of the volunteer leader or a parent/carer.

The giving of gifts is to be done openly and by no means based on favouritism. All Freedom volunteers/leaders should be aware that the giving of gifts can be perceived as bribery or grooming. Adults should exercise care when selecting children/ young people to participate in activities that will be rewarded.

Adult to Child Ratios

In order to supervise children's activities safely, it is necessary to have sufficient adult leaders and volunteers present. There are legal requirements for the adult to child ratios for groups of children aged 8 years and under:

- 0 - 2 years - 1 adult to 3 children
- 2 - 3 years - 1 adult to 4 children
- 3 - 8 years - 1 adult to 8 children

Freedom Church will pursue good practice in adult to child ratios, even where there is no legal requirement, by having at least two adult volunteers who have been safely recruited and DBS

checked with each group of children. This protects both the leaders and children in the event of an accident, illness or toilet trip.

Working Safely with individuals with Disability, Young Adults and Children

Volunteers/ leaders should be vigilant to the needs of a child, young person or adult with a disability. For example, they may need assistance when going to the toilet or require communication through sign language.

It is important for the leader to set appropriate boundaries and ensure all volunteers are aware of these boundaries in order to meet the needs of and empower the individual, and protect the volunteers from false accusations.

Before an event in Freedom Church begins, the volunteer leader will ask the child, young person or adult and the parent/ carer how their needs can be met and will create a care plan that is agreed between all parties.

Intimate Care

Intimate care should be done with dignity and respect and only provided by workers appropriately trained to support these needs. The need for intimate care to be provided should be made clear before any activities begin; this can be made known by the child, young person or adult and the parent/carer. From this, a care plan should be made stating the act of intimate care required and the volunteers administering the intimate care should be informed of this care plan. If it is possible for the parent/carer to provide intimate care, encourage them to do so.

Where possible, the volunteer administering the intimate care should be the same gender as the individual receiving the care. Always avoid doing things for the child or adult if they are able to do it themselves. If they are dependent on you for help, talk to them about what you're doing and offer choices where this is possible.

Be aware of the individual's reactions; look out for dislike or concern and be attentive to any 'grudges' being formed against you based on the provision of intimate care and share this information with your leader or safeguarding coordinator. If you accidentally hurt the child, young person or adult whilst providing intimate care, or you notice sores or tenderness in their genital area, report this immediately. If the child or adult becomes sexually aroused because of your actions, misunderstands your actions, or has an emotional response without apparent cause then report this immediately to your leader or safeguarding coordinator.

When changing nappies, ensure the positioning of the changing table protects the baby from being exposed but also that the leader administering the nappy change will be visible to the rest of the room.

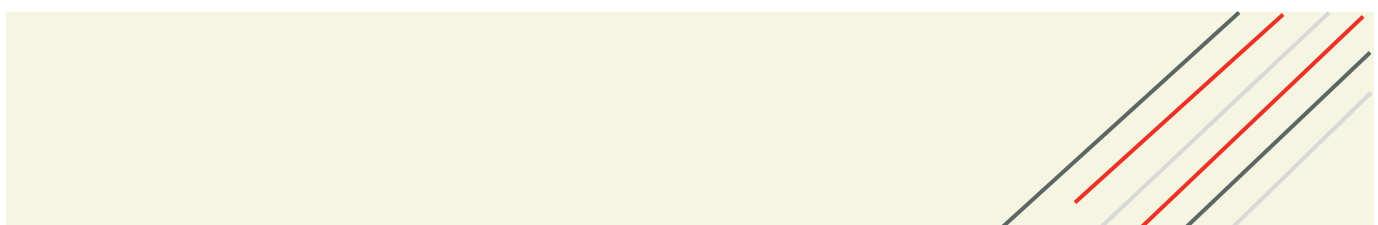
If you are not sure about a practice within intimate care, consult your leader or safeguarding coordinator. Some intimate care procedures are required to be carried out by a nurse or health professional and not by Freedom workers. Do not proceed with providing intimate care if you are unsure of what to do. As a team, aim for a consistent approach for the provision of intimate care.

Challenging Behaviour

At times, a child, young person or adult at risk can become upset, angry or disruptive, which may lead them to put themselves or others at risk of harm.

If someone is being disruptive:

- Ask them to stop.
- Communicate with them to try and understand the upset and what triggered it.
- Inform them that if their behaviour continues, they will be asked to leave.
- If they are harming themselves, others or the property, escort others away from where the disruption is happening into a safer space.
- Contact a parent/carer and ask them to collect their child.
- Ensure a second leader or volunteer is present when dealing with the disruption.
- If your request for the child, young person or adult to stop is being ignored and their behaviour is dangerous, warn the individual that you will be contacting the police.
- As a last resort, if their behaviour persists and the individual or others are at risk of harm, contact the police.



Record the event in an incident form, which you can get from your leader or safeguarding coordinator.

Unexpected Attendance at Specific Activities

In the event where a child or young person attends an activity run by Freedom Church e.g. Zeal, without permission or knowledge of their parents/carers, you should:

- Be welcoming and establish their full name, address and a contact number and any allergies/medical needs. Record this in a register.
- On the second visit of a child or young person, you must send a consent form with the child home to their parents/carers or send an email with the consent form to the parent/carer. Email is the recommended option.

Parents/ Carers Staying with Children's Groups

There may be occasions where a parent or carer would like to stay and watch their child in a Kids room, Zeal event or other occasion. Sometimes this can be helpful to help the child settle into the environment, but once the child is settled, the parent should be encouraged to leave.

It is important to make clear to the parent the difference between observing and taking part. If a parent would like to take part in the child's activities, they are required to go through the normal recruitment process, including a DBS check, to become a volunteer on a Kids/ Zeal team.

In the case where a parent/carer needs to stay they should be given a lanyard that identifies they are not a volunteer and therefore have not been DBS checked. They should be escorted at all times to ensure they are not left alone with any children.

Off-Site Visits

If a trip is planned for children or young adults, these are the standards that need to be upheld prior to and during the off-site visit:

- Prior to the visit, a risk assessment should be carried out by the trip leader and signed off by the safeguarding & health and safety coordinator for the respective campus.
- The leader of the party should have an emergency briefing pack for the duration of the trip; including consent forms, contact details, medical information, response to a child separated from the group and procedure in the event of an emergency.
- Ensure the adult to child ratios are suitable for the activities involved.
- Keep record of transportation details, with named drivers, insurance details etc
- For off-site visits, it is advisable for the leader to have a 'Church phone' used specifically for such events. All contacts necessary can be added to this phone and after the trip, all contacts will be deleted.

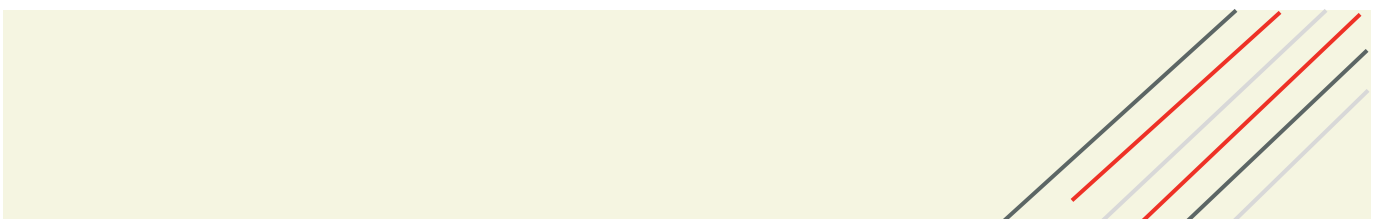
For all documents needed for planning an off-site visit, see your safeguarding coordinator.

For any off-site visits that may include swimming; a risk assessment should be completed. Check the depth of the water, the accessibility, first aid and rescue equipment, changing rooms and availability of qualified staff to supervise the activity- (in the event of no qualified staff to supervise the activity must not go ahead).

There should be an increased adult to child ratio for swimming trips. There should be a lifeguard present and at least two volunteers minding the pool or sea.

Before the trip, consent forms should be completed by a parent/carer and if possible should establish the swimming ability of the child, young person or adult with care or support needs.

Changing areas should be separated by gender, and supervised by two leaders who are of the same sex, e.g. two female leaders in the changing rooms with other females.



Transportation

In the event where a private mini-bus or coach is hired by the Church for transportation, it is the event leader's responsibility to ensure a full risk assessment is completed, to ensure drivers' DBS, insurance, road worthiness of vehicle and seat belts.

When transporting children, young people or adults with care and support needs, driving should be restricted to those that have gone through the recruitment process of a volunteer within Freedom Church and are DBS checked. All drivers must have read the safeguarding policy and agree to adhere to it. The driver should hold a full driving license and the vehicle must be adequately insured. Drivers should ensure that they avoid lone travel with a child.

When travelling with groups in multiple vehicles it is good practice to insist the passengers remain with the same vehicle and driver for the out-going and return journeys, to avoid anyone being left behind.

At collection/drop off points, the driver must make sure the child or young person is being collected by an appropriate adult.

Drivers with parental responsibility who have their own private arrangements are not expected to abide by the same guidelines as volunteers/leaders. (e.g. parents/ carers have agreed joint transportation of children. This is not under the direction of the Church).

It is wise to be alert to any instances where it could be inappropriate for a driver to be with a particular child or young person for a journey, e.g. if a teenage girl has expressed romantic feelings towards a male youth leader.

Residential Activities

A risk assessment must be made before confirming a venue for any residential/ camping trip.

It is compulsory that all volunteers or leaders expected to go on the trip will have gone through the volunteer safer recruitment process, including safeguarding training and DBS check. It is advisable that the organising leader should check with the place they intend to stay for health and safety assessments, and their own safeguarding policy.

It is wise for the safeguarding coordinator to be a part of the organisation of any residential trips.

As with any off-site trip, a signed consent form, medical information and emergency contact list must be provided by the parent/carer prior to the trip.

Sleeping arrangements should be planned with great consideration. Adult accommodation should be separate from children, with no child sleeping in a room alone. In a hotel, it is important for staff to be accommodated at either end of the children's corridor with a sign on their door to clearly identify it as a staff bedroom.

Ensure parents/carers are aware of all sleeping arrangements.

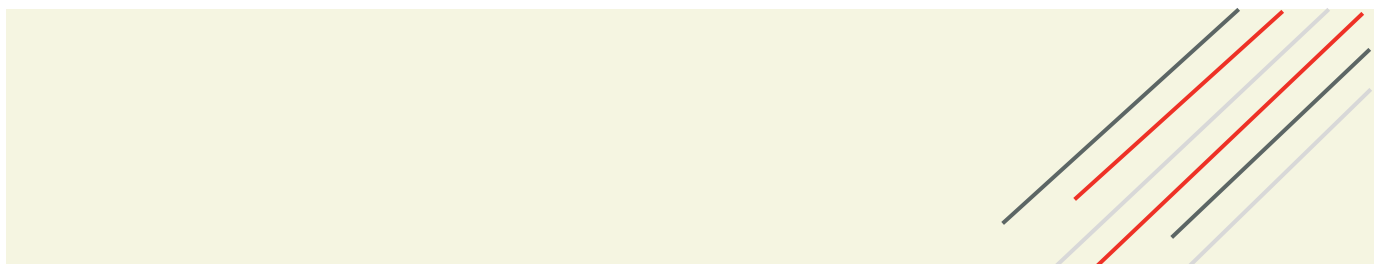
Any allegations made to either a Freedom volunteer or a member of staff from the place of residence should be carried out according to the Freedom Church Safeguarding Policy and procedures.

Filming and Taking Photographs

In accordance with the Data Protection Act 2018, certain protocols must be adhered to within Freedom Church in order to assure the safety of children, young people and adults at risk. Permission must be obtained from both children and adults before any photograph or video is taken of them. The purpose of the photos or footage being taken should be made clear, as well as what it will be used for and who will see it. When using photographs of children, it is advisable to use group images and never identify the child with names or addresses within the photo, ensure that they have appropriate clothing and avoid images of their full face and body participating in an activity which may be misused. A consent form must be completed before any photos or videos are taken.

Social Media and Phone Use

Any volunteer or leader within Freedom Church who is over the age of 18 should not be friends with or follow anyone under the age of 18 on any social media platform.



Communication with Zeal students (ages 11-17) should only be done through a group chat, including other leaders and students. There should be no private messages exchanged between a leader and student.

In any case where a child seeks to follow or friend a worker within Freedom, that person should take a screenshot and make their leader aware. Appropriate guidance and advice should be given to the child regarding acceptable use of social media. Leaders and students must not communicate through Snapchat. Photos of children or young people can only be posted on social media through an official Freedom Church account. Permission must be given from a parent or carer to do this via a consent form.

It is important that all workers who interact with children, including online, look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding Policy.

All workers must ensure any use of online learning tools and systems is in line with privacy and data protection/ GDPR requirements.

Below are some things to consider when delivering virtual sessions/ events and keeping in contact with young people especially where webcams are involved:

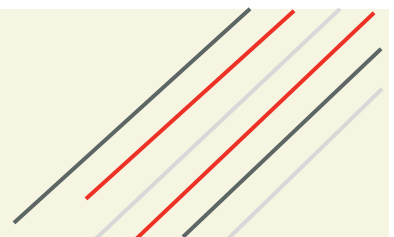
- Workers should only use equipment agreed by the Church to contact children and young people. Any difficulties should be discussed with the Safeguarding Coordinator.
- Where possible all contact should be carried out in groups. 1-1 contact should be avoided.
- All contact with Under 18's should be carried out with parental consent.
- When using online video, workers and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- Where permitted by the technology web-based contact should be recorded so that if any issues were to arise, the video can be reviewed.
- Language must be professional and appropriate, including any family members in the background.
- Workers must consider the most appropriate platforms for use in agreements with Church and age of children.
- Workers should record the time, date and a brief summary of any contact with a young person.

Raising a Concern

Step 1 - If you have a concern of safeguarding poor practice or possible abuse and neglect of a child or adult at risk you should notify the safeguarding coordinator unless they are the subject of the concern and in this case seek guidance from Freedom Church Safeguarding Lead. (Complete the safeguarding referral form as soon as practicable/ or update Safeguard Software).

Step 2- If there is an immediate threat of harm to the child or adult emergency services should be called immediately. (The safeguarding coordinator should be notified as soon as practicable).

Step 3- If you feel that the Safeguarding Coordinator or Freedom Church Safeguarding Lead has not handled the concern appropriately either escalate the concern to the Directional Leadership Team or the Local Authority Designated Officer.



Where an adult or child disclose information regarding possible abuse or neglect of them or another.

- **Listen carefully.** Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause them to 'shut down', retract or stop talking.
- **Let them know they've done the right thing.** Reassurance can make a big impact to them as they may have been keeping the abuse secret
- **Tell them it's not their fault.** Abuse is never the individual's fault and they need to know this.
- **Say you believe them.** They could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them.
- **Don't talk to the alleged abuser.** Confronting the alleged abuser about what the individual told you could make the situation worse.
- **Explain what you'll do next.** If age appropriate, explain to the child you'll need to report the abuse to someone who will be able to help. If an adult and they have not given consent a person's right to confidentiality is not absolute and may be overridden where there is evidence that sharing information is necessary to support an investigation or where there is a risk to others
- **Don't delay reporting the abuse.** The sooner the abuse is reported after the disclosure the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.
- **Write down everything said and what was done and sign and date the notes.** The report should be used where possible and, in any case, a referral must be made to PPS within 24 hours of the incident taking place.
- **Seek medical advice if necessary.**
- **Do not investigate the concern yourself.**

What to do if there is a concern/ allegation against a staff member.

Should a concern arise regarding an employee, volunteer, or organisation partnered with Freedom Church in relation to their conduct with a child or adult at risk, this should be managed as per the safeguarding process and via the safeguarding coordinator who will take steps to ensure the safety of the child or adult at risk.

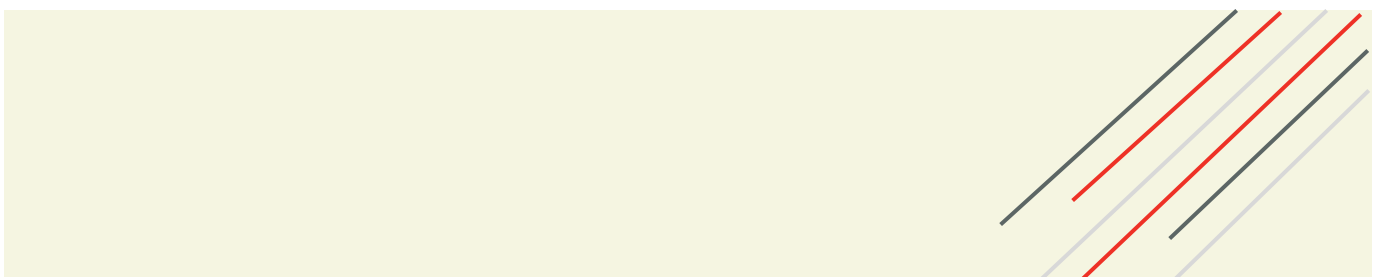
The safeguarding coordinator will then:

- Review the allegation and determine a safeguarding concern in consultation with the Safeguarding Lead.
- Refer the allegation to the relevant Designated Officer from the Local Authority and or the Police.
- Notify DLT and Director of Finance and Systems regarding the activation of internal disciplinary process as per Disciplinary Policy.
- Refer as appropriate to Disclosure and Barring Service.

Records Management, Retention and Disposal

In compliance with the Inquiries Act 2005, it is necessary to retain all information that may be relevant to a past or future safeguarding case. This includes;

- **Allegations/Concerns:** Any information that relates to allegations of abuse or any information that relates to a concern around a risk of potential harm to a child or adult at risk e.g. referral forms, details of how safeguarding procedure was carried out and who by and other records surrounding the allegation/concern.
- **Risk Assessments:** Any information concerning risk assessments, contracts or agreements made with those who may pose a risk, communication with probation officers.
- **Recruitment:** Any information that relates to the recruitment, support or training of workers with Freedom Church, including any records from the Disclosure and Barring Service.
- **Governance/Leadership:** Any information that relates to the safeguarding leadership (including DLT and Trustees) and development/adoption of the safeguarding practices and policy.



What types of records to keep and how long to keep them for:

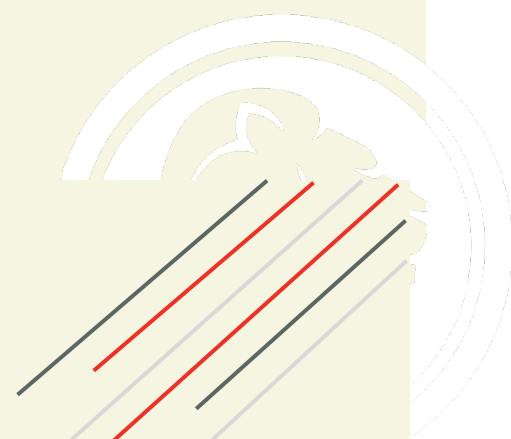
Allegations/Concerns/Risk Assessments	Record Keeping	Retention
Records regarding an allegation or concern of abuse for a child or adult at risk including; referral forms, contracts, risk assessments and procedures carried out.	It is essential that a record of safeguarding concerns or disclosures, and records of how they were handled and followed up should be kept.	70 years after the last contact with the individual(s) concerned.
Records regarding an allegation or concern of abuse involving a Church worker including; action taken, decisions made and eventual outcome.	It is essential that a record of safeguarding concerns or disclosures, and records of how they were handled and followed up should be kept.	75 years after employment ceases.
Activities for Children and Young People	Record Keeping	Retention
Records of any children's activities such as; Kids ministry, Zeal, off-site trips. Information should include attendance, risk or safety assessments etc.	It is necessary to keep these records, while protecting personal data.	50 years after the activity ceases.

Recruitment	Record Keeping	Retention
Workers (who work with children, young people or adults at risk) personnel records, where there was no safeguarding allegations or investigations.	This information can include job descriptions, references, training documentation etc.	20 years after the worker's death.
Workers (who work with children, young people or adults at risk) personnel records, where there was a safeguarding allegation or investigation - regardless of the outcome.	This information can include job descriptions, references, training documentation etc and all documents surrounding the allegation.	50 years after the worker's death.
Personnel records relating to workers who do not work with children, young people or adults at risk.	This information can include job descriptions, references, training documentation etc.	6 years after employment/volunteering ceases.
Disclosure and Barring Services (DBS) disclosures obtained as part of the safer recruitment process.	A DBS certificate is not allowed to be retained for longer than 6 months, it is permissible to keep a record of the date of the check; the name of the person; the type of certificate requested and its reference number; the position for which the certificate was requested; and the actions taken. This should be stored in the individual's personal file.	DBS certificate - 6 months after issue.

For further information on remaining within General Data Protection Regulations (GDPR) guidelines please see our Data Protection policy.

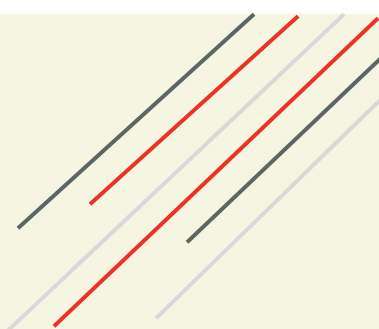
Freedom Church Safeguarding Referral Form

Risk / Concern Category <i>(High, Medium, Low, No)</i>	
How would you classify this concern?	
Safeguarding lead assessment	
Final assessment if different	
Date of Referral	
Location	
Person Referring (you)	
Contact Details (your)	
Date of Incident	
Name(s) of Child, Children or Adult(s)	
Child or Adult?	
Date(s) of Birth	
Ethnicity	
Disability	
Gender	
Contact Details <i>(parents if refers to a child)</i>	
Person(s) alleged to have caused harm or risk of harm	
Employee?	
Role	
Relationship to victim(s)	
Contact details	
Details of incident or concern Please give an outline of the concern.	
Type of concern. <i>Neglect, Physical Abuse, Emotional Abuse, Sexual Abuse, Bullying, Financial, Grooming, Mental Health</i>	
Action Taken	
Does the child or adult know that you have made this referral? Has the adult consented to the reporting of this concern.	



Colour	Risk Level	Criteria and Examples	Immediate Action
	High	<i>Serious harm or risk of harm to a child or adult at risk, likely or actual criminal activity and clear abuse of a child or adult at risk perpetrated by an adult or someone in a position of trust. Meeting one of the abuse categories and risk of reputational harm to the organisation. Will require the involvement of statutory agencies. Any matter of a sexual nature would be classified high. Matters referred by the police will almost certainly be high.</i>	As the concern pathway details above to contact Police. Notify Safeguarding Coordinator. Notify Head of Safeguarding. Implement Response Plan
	Medium	<i>Potential serious matters that relates directly to the abuse categories and may include bullying type behaviour. Has the potential to become criminal. Likely to have reputational damage and include media interest. Risk of significant harm.</i>	Consider statutory agencies. Notify Safeguarding Coordinator. Consider Police.
	Low	<i>Low level mildly abusive type behaviour or bullying that may be one off or accidental or non- malicious. Little risk of harm or actual harm. Still requires safeguarding or other involvement but lacks seriousness to involve external agencies.</i>	Process as detailed above.
	No	<i>Minor concern that presents no risk of harm to anyone. Quickly dismissed or dealt with. Mistaken concern.</i>	Share decision back and instruct on minor actions or no action.

Managing Those Who May Pose a Risk



There may be those within the communities that Freedom Church serves, who may pose a risk to others. They may want to attend and be involved with the Church, with the genuine intentions of changing for the better or in the hope of gaining access to children or adults.

A person who may pose a risk to others is anyone who has committed sexual or violent crimes against children or adults at risk.

It is important to understand that no matter how well-intentioned a sex offender or violent person is, their crimes are often addictive.

Under no circumstances should a person who may pose a risk be given any position or responsibility that can be perceived as a position of trust. A plan should be constructed between the campus pastors, safeguarding coordinator and the person who may pose a risk, to agree upon boundaries that will protect all parties.

Working in Partnership

Within three months of the adoption of this safeguarding policy, we commit to develop clear guidelines in regards to our expectations of those with whom we work in partnership, both in the UK and abroad. This will include a partnership agreement for safeguarding.

Related Policies

- E-safety policy
- Whistleblowing policy
- Safer recruitment volunteers
- Health and safety policy
- Data protection policy
- Complaints handling policy
- Domestic Abuse Policy

Useful Links

Police

999 Emergency telephone number

101 Non-emergency telephone number

The National Domestic Violence hotline

0808 20000 247

Childline

0800 1111

Salvation Army – modern slavery & human trafficking

0300 3038151 safeguarding@salvationarmy.org.uk

Modern Slavery Helpline

08000121700

NSPCC

<https://www.nspcc.org.uk>

Ann Craft Trust

<https://www.anncrafttrust.org>

Thirty One Eight

<https://thirtyoneeight.org>

