

# **SAFEGUARDING POLICY**

**VERSION: February 2026**

**Next Trustee Review Date: February 2027**



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## **1. Details of the Organisation**

### **1.1 Name of Organisation**

Church Pastoral Aid Society (CPAS)

### **1.2 Address**

Sovereign Court One (Unit 3)  
Sir William Lyons Road  
University of Warwick Science Park  
Coventry  
CV4 7EZ

### **1.3 Contact information**

*Phone:* 0300 123 0780

*General Enquiries:* [info@cpas.org.uk](mailto:info@cpas.org.uk)

*Safeguarding:* [safeguarding@cpas.org.uk](mailto:safeguarding@cpas.org.uk)

### **1.4 Charity number**

1007820

### **1.5 Regulators**

The Charity Commission

### **1.6 Insurance Company**

Ecclesiastical Insurance UK



## 2. Introduction

### 2.1 Who is CPAS?

CPAS is one of the Church of England's Mission Agencies<sup>1</sup>. CPAS is also an independent charity (1007820) that operates under requirements from the Charity Commission and a company limited by guarantee (2673220). CPAS references safeguarding policy and practice within the Church of England, Disclosure and Barring Service and other UK legislation.

CPAS has 3 main ministry streams: it serves as the largest Patron of churches within the Church of England, it provides leadership training and resources for church leaders and facilitates the delivery of residential holidays for children and young people. CPAS also employs a range of support staff including Fundraising and Communications, Finance, Safeguarding and IT.

As an Anglican evangelical mission agency, we believe that the message of the gospel is relevant to all people, and that effective local church ministry is the key to seeing men, women, young people and children come to faith in Christ. Since being founded in 1836 our activities may have changed with the times, but our original mission to enable churches to bring the gospel to every person's door is still the driving force behind all we do.

### 2.2 Purpose of this policy

This policy applies to all staff, the Board of Trustees, Council of Reference, volunteers, sessional workers, agency staff, or anyone working on behalf of CPAS.

The purpose of this policy is:

- To protect children, young people and adults at risk who receive CPAS' services.
- To provide our staff and volunteers with the overarching principles that guide our approach to safeguarding and child protection.

### 2.3 Key Definitions

CPAS uses the NSPCC definition of safeguarding children:

*'The responsibilities that are taken to promote the welfare of children and protect them from harm'.*

CPAS endorses the following statement in Promoting a Safer Church – The Church of England's Safeguarding Policy for Children, Young People and Adults:

*'Safeguarding means the action the Church takes to promote a safer culture. This means we will promote the welfare of children, young people and adults, work to prevent abuse from occurring, seek to protect those that are at risk of being abused and respond well to those that have been abused.'*<sup>2</sup>

The term 'child' refers to anyone under the age of 18.

CPAS defines 'adults at risk of harm' as anyone over the age of 18 who is at risk of abuse or neglect because of their needs for care and support, is experiencing or is at risk of abuse or neglect, and, as a result of those needs, is unable to protect themselves (The Care Act 2014).

Definitions of types of abuse can be found in Appendix A.

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<sup>1</sup> **Mission Agencies**, <https://www.churchofengland.org/more/church-resources/world-mission/mission-agencies>, (The Church of England, March 2019).

<sup>2</sup> **Promoting a Safer Church**, <https://www.churchofengland.org/sites/default/files/2019-05/PromotingSaferChurchWeb.pdf>, (The Church of England, 2017).



### 3. Commitment to Safeguarding

#### 3.1 Safeguarding Policy Statement

CPAS's purpose is to enable churches to help every person hear and discover the good news of Jesus Christ. Safeguarding is part of our mission and not a barrier to it. We uphold the welfare of the child as being paramount (Children Act 1989) and believe that all children and adults at risk of harm regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have a right to equal protections from all types of harm or abuse. We recognise that some people are additionally vulnerable because of the impact of previous experiences, additional needs, social circumstances or other risk factors. CPAS views working in partnership with children and adults at risk of harm, alongside their parents, carers and other agencies, as essential in promoting their welfare.

CPAS affirms the Principles of the House of Bishops' Policy for Safeguarding that: *'Every person has a value and dignity which comes directly from the creation of male and female in God's own image and likeness. Christians see this potential as fulfilled by God's re-creation of us in Christ. Among other things this implies a duty to value all people as bearing the image of God and therefore to protect them from harm.'*

Further information on the CPAS' stance on safeguarding and theology is further explored in Appendix B.

#### 3.2 Values and Culture

CPAS has the following values;

- Missionally Focused.
- Graciously Engaged.
- Boldly Innovative.
- Courageously Hopeful.

CPAS believes that safeguarding is everyone's responsibility and is committed to protecting children and adults at risk of harm from maltreatment and facilitating safe environments where they can flourish. In order to ensure this happens throughout our work with children and young people who engage in our residential holidays, our leadership training and activities, our patronage work and in our support services, we will:

- Specify appropriate and robust policies and procedures for safeguarding.
- Appoint nominated staff and volunteers with safeguarding responsibilities that are clearly articulated in their job/role descriptions.
- Appoint a Safeguarding Trustee with appropriate experience and skills.
- Provide effective management to staff and volunteers.
- Recruit and select staff and volunteers who are safe to work with children and young people.
- Record and store information safely, using our Child Protection Online Management System (CPOMS) or other designated systems.
- Ensure that children and young people, our staff and volunteers know where to go for help if they have a concern.
- Manage concerns or allegations in a prompt, fair and sensitive manner in accordance with relevant policies.
- Ensure sufficient resource is available for the management of safeguarding activity.



- Create and maintain an anti-bullying environment and ensure we have policies to help us deal effectively with any bullying that does arise.
- Monitor and understand safeguarding activity and ensure a learning culture is promoted to ensure our policies and training are relevant and high quality.
- Actively lead a culture that promotes excellence in safeguarding.

### **3.3 Legal Framework**

This policy has been drawn up on the basis of law and guidance that seeks to protect children and adults at risk of harm. A list of these can be found in Appendix C.

As CPAS is a regulated activity provider it has a legal duty to refer to Disclosing and Barring Service (DBS) where prescribed conditions are met.

As a registered charity, CPAS' trustees are required to report serious incidents to The Charity Commission. This duty requires prompt, full and frank disclosure in line with their guidance on reporting. A serious incident is an adverse event, which results in or risks significant harm to the charity's beneficiaries, staff, volunteers or others who come into contact with CPAS through its work.

CPAS engages with professional bodies to support safe outcomes for children and adults at risk of harm, including but not limited to social care, police, Local Authority Designated Officer (LADO), as well as church safeguarding structures and personnel.

### **3.4 Policies and Procedures**

This policy should be read alongside CPAS policies and procedures on:

- Safer Recruitment, Induction, and Training.
- Safeguarding Officer Handbook for Venture and Falcon holidays.
- Anti-bullying Policy.
- Anti-sexual Harassment Policy.
- Code of Conduct for Staff.
- Other Events Policy for Venture and Falcon holidays.
- Data Protection Policy.
- Complaints Policy.
- Whistleblowing Policy.
- Grievance Policy.
- Health and Safety.
- Training, Supervision, and Support.
- Lone Working Procedure within the Staff Handbook.

All staff, trustees, volunteers, and those acting on behalf of CPAS are expected to comply with the Code of Conduct, which sets out clear standards of professional, pastoral and safeguarding behaviour. Failure to adhere to the Code of Conduct may result in action being taken under this Safeguarding Policy, including management through the low-level concerns process, escalation to formal safeguarding procedures, disciplinary action, or referral to statutory agencies where appropriate. The Code of Conduct is included in Appendix G.

### **3.5 Quality Assurance Framework**

CPAS' Quality Assurance Framework is the way in which we monitor and evaluate practice to support continuous learning and improvement to achieve better outcomes for our stakeholders. This includes a regular cross-organisation Safeguarding Committee where safeguarding related policies are



reviewed, organisation-wide learning is shared, and safeguarding-specific decision-making takes place.

Consistency in our safeguarding processes is strengthened by robust process guidance documents including the Safeguarding Officer Handbook and a range of standard operating procedures.

Regular feedback is sought from stakeholders regarding the impact of the training and resources we offer to strengthen safeguarding practices within CPAS and is used to guide service improvement.

Staff regularly attend internal and external training to ensure they are up to date with relevant legislation and best practice.

Ventures and Falcons holidays are visited once every 3 years by CPAS staff to offer guidance as well as assess compliance and functionality, to ensure high quality provision and support the holiday by sharing leadership expertise.

CPAS works closely with Thirtyone:eight, our external safeguarding consultants, who provide safeguarding advice and guidance and scrutinise changes made to our safeguarding policy and practice.

Jersey Road PR consultants provide expert advice to CPAS in forming careful, considerate and compassionate external communications of our internal processes to reduce to the risk of causing further distress to those affected by significant events. We work collaboratively to ensure communications are accurate, truthful and sensitive, in line with CPAS' values.





## 4. Delivering on our Commitment

### 4.1 Our Commitment in Action

CPAS is committed to valuing, listening and respecting children and adults at risk of harm. We aim to keep them safe by ensuring the correct staff are in the right positions by recruiting them safely and completing all necessary checks (including DBS checks at the appropriate level for the role) and supporting them with robust policies, procedures and training.

CPAS promotes an anti-bullying culture with a policy to support effective management of any cases that arise. Our Complaints Policy for external matters, together with our Whistleblowing Policy, and Grievance Policy for internal matters, foster a healthy working environment. This is strengthened by adherence to health and safety measures in accordance with the law and regulatory guidance. Staff and volunteers are provided with supervision, support and training.

We use our safeguarding procedures to share concerns and relevant information with agencies who need to know and involve the adults at risk, children, parents, families and carers, appropriately. We use our procedures to manage any allegations against staff and volunteers (current or historic) as indicated. CPAS records and stores information securely, and shares information about safeguarding and good practice with children, their families, staff and volunteers.

### 4.2 Staff with Safeguarding Responsibilities

CPAS affirms that safeguarding is everyone's responsibility. Specific safeguarding responsibilities are outlined in job descriptions and monitored in line management. Volunteer roles regarding safeguarding on Ventures and Falcons holidays are outlined in the training provided and specific handbooks.

The following table outlines the named roles and key responsibilities within safeguarding at CPAS:

Role	Responsibilities
Chair of Trustees	Effective running of Board of Trustees. Ensuring adequate training of trustees, including Safeguarding. Independent adjudication if escalation required. Responsible for overseeing any referrals to the Charity Commission. Allocating sufficient time in meetings to review safeguarding reports.
Board of Trustees	Authorising safeguarding policy and procedures. Holding CPAS staff to account for delivery of agreed policies and procedures. Allocating sufficient resources to safeguarding. Ultimate responsibility for ensuring there are measures in place to protect the people who come into contact with the charity from harm.
Designated Safeguarding Trustee	Supporting the Board in developing their individual and collective understanding of safeguarding. Liaising and working collaboratively with CEO and Safeguarding Manager on all serious safeguarding cases. Ensuring strategic plans reflect safeguarding legislation. Being a point of contact for staff or volunteers if someone wishes to complain about a lack of action in relation to safeguarding concerns.
Chief Executive Officer (CEO)	Overall Safeguarding Lead for CPAS. Accountable to Board of Trustees overseeing safeguarding implementation and robust reporting Chair of Safeguarding Committee.



	Ensuring safeguarding is a central part of the organisation's culture, strategy and delivery.
Safeguarding Team	<p>Creation, delivery and monitoring of staff and volunteer safeguarding training and materials.</p> <p>Ensuring safeguarding and related policies and procedures are fit for purpose and up to date.</p> <p>Overseeing casework, advising on systems and leading on reviews.</p> <p>Creating a consistent safeguarding approach across the whole organisation and ensuring everyone in the organisation is aware of their safeguarding responsibilities and knows how to respond to concerns.</p> <p>Be the initial point of contact for safeguarding concerns.</p> <p>Responsible for strategic relationship with Thirtyone:eight (external safeguarding consultant).</p> <p>Responsible for Safeguarding Committee agenda.</p> <p>Write and inform safeguarding related policies.</p>
Director of Operations and Finance	<p>Overall Deputy Safeguarding Lead for CPAS.</p> <p>Initial point of contact for Whistleblowing and Grievances.</p> <p>Overseeing management of complaints.</p> <p>Reviewing VF safeguarding incident reports.</p> <p>Member of Safeguarding Committee.</p> <p>Line managing Safeguarding Manager.</p>
VF Principal	<p>Safeguarding Lead for VF.</p> <p>Consulting on training and provision for VF volunteers.</p> <p>Reviewing VF processes and procedures.</p> <p>Reviewing VF safeguarding incident reports.</p> <p>Working collaboratively with Safeguarding Manager to manage leadership related safeguarding concerns.</p> <p>Member of Safeguarding Committee.</p>
Safeguarding Committee	<p>Providing oversight for evolving organisational safeguarding policy and practice to ensure an integrated approach.</p> <p>Collectively considering factors that impact positive organisational culture change.</p> <p>Providing oversight for the developments in safeguarding best practice, sharing relevant case reviews/reports and legislation.</p> <p>Reviewing changes to policy and processes across the organisation to ensure a consistent approach to safeguarding practice.</p> <p>Annually review the CPAS Safeguarding Policy.</p> <p>Consider staff training requirements to support culture change and build skill.</p> <p>Discuss lessons learned from safeguarding incidents.</p> <p>To inform and contribute to the annual safeguarding report.</p> <p>Monitoring the Quality Assurance Framework and Service Improvements.</p>
Safeguarding Officer and Deputy Safeguarding Officer on Venture and Falcon Holidays	<p>The roles of Safeguarding Officer and Deputy are equally authorised to fulfil the role when there is a need to deputise for each other, as required.</p> <p>The main responsibility for providing in-person safeguarding training to all volunteers before the start of the holiday using resources provide by CPAS falls to the Safeguarding Officer.</p> <p>Both roles are responsible for recording all safeguarding concerns on CPOMS and contacting relevant agencies where indicated.</p> <p>Recording and referring will be completed by officer who managed the safeguarding concern.</p>



	<p>Both are responsible for seeking advice and support when required to safely manage a situation.</p> <p>Both must follow safeguarding advice received from CPAS Safeguarding Manager and Thirtyone:eight.</p> <p>Communications regarding creation of an adequate care plan and risk assessment for anyone with an identified need for the holiday is primarily done with the Safeguarding Officer.</p> <p>Both are responsible for collaborating with the Overall Leader(s) who holds ultimate responsibility for all matters concerning the holiday.</p> <p>Both are responsible for ensuring that procedures and good practice are in place and that their importance in preventing and responding to safeguarding concerns is understood.</p> <p>The Safeguarding Officer is the first line of reference for any volunteer who wishes to raise an issue or concern.</p> <p>Both are responsible for ensuring young people on the holiday feel safe.</p>
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### 4.3 The Role of Trustees

Trustees have a responsibility to promote the welfare of all children and adults at risk of harm to keep them safe. Whilst there is a designated lead trustee for safeguarding, all trustees are jointly responsible for safeguarding and are committed to ensuring that this responsibility is fulfilled. CPAS Trustees should be compliant with The Charity Commission's guidance that:

*'Trustees of charities which work with vulnerable groups, including children, must always act in their best interests and ensure they take all reasonable steps to prevent harm to them. Having safeguards in place within an organisation not only protects and promotes the welfare of children but also it enhances the confidence of trustees, staff, volunteers, parents/carers and the general public.'*<sup>3</sup>

CPAS trustees should ensure CPAS policies are based on guidance from the Charity Commission for England and Wales<sup>4</sup>. In particular, CPAS trustees should acknowledge their responsibility as stated in this strategy paper that:

*'Trustees of charities which work with vulnerable groups and children have a duty of care to their charity which will include taking the necessary steps to safeguard and take responsibility for those children and vulnerable adults. They must always act in their best interests and ensure they take all reasonable steps to prevent any harm to them.'*<sup>5</sup>

### 4.4 Safer Recruitment

CPAS will use the Safer Recruitment policy and procedures for recruitment of all staff and volunteers who are recruited and managed by CPAS. Safer Recruitment is a vital part of creating a safe and positive environment and can act as a deterrent for those who have ill intentions when applying for roles that provide them access to adults at risk of harm and/or children.

<sup>3</sup> **Strategy For Dealing With Safeguarding Vulnerable Groups Including Children Issues in Charities**, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/406885/Safeguarding\\_strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/406885/Safeguarding_strategy.pdf), (The Charity Commission for England and Wales, Accessed March 2019), p5.

<sup>4</sup> **Safeguarding Duties for Charity Trustees**, <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>, (Charity Commission of England and Wales, March 2019).

<sup>5</sup> **Strategy for Dealing With Safeguarding Vulnerable Groups Including Children Issues in Charities**, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/406885/Safeguarding\\_strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/406885/Safeguarding_strategy.pdf), (The Charity Commission for England and Wales, Accessed March 2019), p5.



Our Safer Recruitment Policy is a vital part of our structures that safeguard and protect all children and adults at risk of harm. Our safer recruitment practices set out how we:

- Identify and reject applicants who are unsuitable to work with children and adults at risk of harm.
- Respond to concerns about the suitability of applicants during the recruitment process.
- Respond to concerns about the suitability of employees and volunteers once they have begun their role.
- Ensure all new staff and volunteers participate in an induction which includes safeguarding training.

The following safer recruitment checks are undertaken for recruitment to posts within CPAS:

CPAS staff	Application form References x3 Confidential Declaration form (for roles requiring an Enhanced DBS check) Declaration of Suitability form (for roles requiring a Basic DBS check) Interview with safeguarding question DBS check of the relevant level Induction including safeguarding training Probationary period and review
CPAS staff who are Clergy	All checks listed above for CPAS staff, plus: Reference from diocesan bishop for their previous role; Evidence of appropriate authorisation – either Permission to Officiate (PTO) or Clergy Licence; Evidence that they have an up-to-date listing on the National Register of Clergy
VF Volunteers	Application form taken up yearly including Self-declaration questions Appropriate level DBS check for their role 1 church and 1 personal reference for new leaders or 1 church reference only for returning leaders. (References are taken in writing and must not be completed by a spouse or family member; avoiding where possible another holiday team member. The VF office manages the take-up of references, declaration forms and DBS checks for Overall Leaders.) Completion of online safeguarding module Overall Leaders must also have an induction session with the VF Principal before beginning their role
Trustees	Application form Trustee eligibility, declarations and obligations form References Interview(s) Confidential declaration form Enhanced DBS for child workforce Check the Charity Commission Register of Removed Trustees
Council of Reference	Application form References Declaration of Suitability form
President	Application form References Declaration of Suitability form
Vice-Presidents	Application form References Declaration of Suitability form



CPAS are represented by a select few Patronage Clergy at licensing events. These representatives must abide by the church safeguarding policy and procedures.

CPAS will not accept as a volunteer in Ventures and Falcons anybody who is known to have harmed children and will take all reasonable steps to ascertain the background of potential volunteers. It is illegal to recruit a volunteer into such a role who is barred from work with children by the Disclosure and Barring Service DBS.

#### 4.5 Recruitment of ex-offenders policy

As noted on the volunteer application form, a criminal record will not necessarily prohibit the appointment of an individual as a volunteer.

With regard to certain specific areas, our policy is as follows:

- Volunteers will not be accepted on a Venture or Falcon team if they have any previous convictions or cautions for offences against children, offences of domestic abuse where children were affected, or if they are barred by the Disclosure and Barring Service;
- Volunteers with any offence involving possession, supply or use of drugs, where the conviction took place within three years prior to the individual's application will not be accepted. After three years have elapsed since the conviction, either the VF Principal or Safeguarding Manager will review each individual application supported by a new DBS check indicating no new convictions within that three-year period.
- Volunteers who have used drugs or any other substances leading to a change of behaviour (e.g. petrol, legal highs, glue), which doesn't appear as a conviction on their DBS certificate but has been highlighted in a self-disclosure or a reference, for example, will be considered by either the VF Principal or Safeguarding Manager on a case-by-case basis.
- Volunteers with any offence involving dangerous driving, driving under the influence of alcohol or drugs or careless driving where the conviction took place within ten years prior to the individual's application will not be allowed to drive with any passengers in their vehicle during a Venture or Falcon.

Other offences and issues will be considered on an individual basis by the VF Principal and/or Safeguarding Manager (in discussion with the Overall Leaders where applicable) with specialist advice where appropriate. In particular, we will consider the following points:

- Whether the conviction or other matter revealed is relevant to the position in question;
- The seriousness of any offence or other matter revealed;
- The length of time since the offence or other matter occurred;
- Whether the applicant has a pattern of offending behaviour or other relevant matters;
- Whether the applicant's circumstances have changed since the offending behaviour or other relevant matters;
- The circumstances surrounding the offence and the explanation(s) offered by the convicted person.

#### 4.6 Safeguarding Training

CPAS recognises training as an important part of staying up to date with best practice in safeguarding. The table below details the minimum safeguarding training requirements set by CPAS. Greater depth of learning is supported by the organisation and is arranged based on identified need for each role e.g. DBS training for HR staff, Safeguarding Supervisor training for Safeguarding Manager.

All CPAS staff	Induction safeguarding meeting within first 2 weeks of employment with CPAS to make aware of policy and process.
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	<p>Internal basic safeguarding training, nuanced to meet the needs of the team/staff member shortly after commencing role and once every 3 years.</p> <p>Yearly topical refresher sessions.</p> <p>Regular updates on relevant external safeguarding developments and reviews.</p>
Senior CPAS staff	<p>All CPAS staff training plus:</p> <p>Church of England training renewed every 3 years:</p> <p>Safeguarding – Basic Awareness</p> <p>Safeguarding – Foundations</p> <p>Safeguarding – Senior Leadership Pathway</p>
Safeguarding Team	<p>All CPAS staff training plus:</p> <p>Continued Professional Development in Safeguarding every year</p> <p>Church of England training renewed every 3 years:</p> <p>Safeguarding – Basic Awareness</p> <p>Safeguarding – Foundations</p> <p>Safeguarding – Senior Leadership Pathway</p> <p>Safer Recruitment and People Management</p> <p>Raising Awareness of Domestic Abuse</p>
Safeguarding Committee members	<p>All CPAS staff training plus:</p> <p>Church of England training renewed every 3 years:</p> <p>Safeguarding – Basic Awareness</p> <p>Safeguarding – Foundations</p> <p>Additional training as required by role</p>
CPAS staff who are clergy	<p>All CPAS staff training plus:</p> <p>Church of England training renewed every 3 years:</p> <p>Safeguarding – Basic Awareness</p> <p>Safeguarding – Foundations</p> <p>Safeguarding – Leadership Pathway</p> <p>Safer Recruitment and People Management</p> <p>Raising Awareness of Domestic Abuse</p>
Patronage staff	<p>All CPAS staff training plus:</p> <p>Church of England Safer Recruitment training once every 3 years.</p>
Human Resources	<p>All CPAS staff training plus:</p> <p>Church of England training renewed every 3 years:</p> <p>Safeguarding – Basic Awareness</p> <p>Safeguarding – Foundations</p> <p>Safeguarding – Senior Leadership Pathway</p> <p>Safer Recruitment and People Management</p>
VF staff	<p>All CPAS staff training plus:</p> <p>Church of England training renewed every 3 years:</p> <p>Safeguarding – Basic Awareness</p> <p>Safeguarding – Foundations</p> <p>Internal training on CPOMS, effective record keeping processes, and management of safer recruitment protocols.</p> <p>Online Basic Safeguarding Module for Residential Holidays once every 3 years.</p>
VF Volunteers	<p>Online Basic Safeguarding Module for Residential Holidays once every 3 years.</p> <p>In-person holiday-run Safeguarding Training using CPAS resources prior to every holiday.</p> <p>Safeguarding Officers and Deputy Safeguarding Officers attend an online briefing regarding their roles, responsibilities and expectations once every 3 years.</p>





Trustees	Once every 3 years: NSPCC Safeguarding Training for Charity Trustees. Church of England: Safeguarding – Basic Awareness Church of England: Safeguarding – Foundations
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#### 4.7 Safeguarding Guidance Provided to Ventures and Falcon Volunteers

The VF team provides its volunteer leader community with a variety of guidance, the key items covering safeguarding being our handbooks, updated annually and issued in spring of each year:

- Overall Leaders Handbook, including:
  - Safer Recruitment Policy and processes.
  - Safeguarding of children and young people.
- Safeguarding Officer's Handbook.
  - Safeguarding Policy and procedures covering:
    - Safer recruitment.
    - Visitors.
    - Drugs.
    - Self-harm.
    - Bullying.
    - PREVENT Duty.
    - Communication with parents.
    - Contact with members during the year.
    - Online safety.
    - Photographs and video images.
    - Safe/best practice.
    - Procedures for Safeguarding Officers.
    - Reporting and recording safeguarding incidents.

#### 4.8 Safeguarding Guidance Provided to All CPAS Volunteers

All volunteers have access to our external safeguarding consultants, Thirtyone:eight, for support during residential and day events. This can be accessed throughout the year, and can be used to provide advice and guidance, as well as to handle specific situations.

All volunteers are required to act in accordance with the Code of Conduct and this Safeguarding Policy. Where behaviour falls short of expected standards, concerns will be addressed proportionately in line with safeguarding procedures.

##### 4.8.1 Safety in Prayer Ministry and Deliverance

Prayer ministry offered in connection with any CPAS activity must always be safe, pastoral, transparent, and consistent with the safeguarding principles of the Church of England. All prayer ministry should be rooted in care, consent, dignity and accountability, and must never cause harm, distress, or fear.

Church of England guidance states that deliverance ministry and exorcism are specialist practices that require specific authorisation, discernment, and oversight by the Diocesan Bishop. They must never be undertaken independently, informally, or without appropriate ecclesiastical authority, safeguarding oversight, and professional support.

The organisation strongly advises that no form of deliverance ministry or exorcism is undertaken in connection with its activities and must not take place under any circumstances during a VF holiday or residential activity. Such settings are not appropriate for this type of ministry due to



the heightened safeguarding risks, power imbalance, lack of diocesan oversight, and the potential for emotional, psychological, or spiritual harm.

Prayer ministry should:

- Be non-coercive, voluntary, and undertaken only with the informed consent of the individual.
- Be pastoral and supportive, focusing on encouragement, reassurance, and care rather than diagnosis, confrontation, or attribution of spiritual causes.
- Never involve physical restraint, shouting, commanding language, isolation, or practices that may cause fear, distress, or humiliation.
- Never seek to replace medical, psychological, or professional support.
- Take place in appropriate settings, with transparency and accountability, and never in secret or one-to-one with a child or young person.

Any concerns about spiritual distress, mental health, or perceived need for specialist ministry should be referred appropriately, following safeguarding procedures and, where relevant, signposted to medical, mental health or church safeguarding and pastoral pathways.

#### **4.9 Clergy serving with CPAS:**

Clergy who serve in any capacity with CPAS remain subject to the safeguarding requirements of the Church of England. This includes adherence to the House of Bishops' safeguarding guidance and the Church of England's Safeguarding Practice Guidance, alongside compliance with this organisation's Safeguarding Policy and procedures.

Clergy are expected to uphold the highest standards of safeguarding practice, act in accordance with their ministerial responsibilities, and cooperate fully with any safeguarding processes or concerns arising within the organisation. Where safeguarding concerns involve clergy, these will be managed in line with this policy and, where appropriate, in liaison with relevant Church of England safeguarding authorities.

#### **4.10 Partnership Working and Safeguarding Expectations**

CPAS is committed to working with our Partners in Mission to further the good news of Jesus Christ. Effective partnership working requires all parties to understand, share, and uphold good safeguarding practice. Where activities are delivered jointly with other organisations, churches or individuals, safeguarding responsibilities must be clearly understood and agreed. Partners, contractors, and third parties are expected to have appropriate safeguarding arrangements in place and to comply with this Safeguarding Policy while engaged in any activity connected to the organisation. Any safeguarding concerns arising within partnership activity must be reported promptly in line with this policy and, where appropriate, to statutory agencies. The organisation may seek assurance of safeguarding compliance and will take appropriate action where safeguarding standards are not met.





## 5. Responding to Concerns

CPAS follows the '4 R's of safeguarding': Recognise, Respond, Record, and Report/Refer principle in handling safeguarding concerns. This section explains the process and guidance for each of the '4 R's'.

### 5.1 RECOGNISE

#### 5.1.1 How to Identify a Concern

Signs and symptoms of harm and abuse are not always obvious or clear, but there are warning signs we should all be aware of that support the recognition of abuse and prompt action to be taken to prevent it. The definitions of abuse in Appendix A also include indicators that can inform identification of signs of abuse.

#### 5.1.2 Low-Level Concerns

Not all concerns identified will meet the threshold for harm or require immediate safeguarding action. Low-level concerns relate to behaviour that falls below expected professional, pastoral, or safeguarding standards but does not meet the threshold for a formal safeguarding allegation, disciplinary action, or statutory referral. While such concerns may appear minor or isolated, they are important to recognise and record, as they may form part of a wider picture over time. Low-level concerns can be understood as individual jigsaw pieces which, when viewed together, may highlight emerging risk or the need for early intervention. Further guidance on identifying and managing low-level concerns is set out in the Low-Level Concerns Policy (Appendix H).

Staff and volunteers should exercise **proactive awareness and diligent inquiry** (a.k.a. professional curiosity) when observing behaviour or receiving disclosures. This includes paying attention to subtle cues, ambiguous statements, or changes in behaviour that may indicate discomfort or risk. Careful and sensitive enquiry ensures that potential safeguarding concerns are not overlooked and supports early intervention where needed.

Failure to report or respond appropriately to any concern, whether low-level or safeguarding, is itself a serious matter and may be treated as a safeguarding concern or breach of professional standards. All staff and volunteers have a responsibility to act promptly, following this policy, to ensure the safety and welfare of children and adults at risk.

#### 5.1.3 Code of Conduct

All staff and volunteers are expected to adhere to CPAS' Code of Conduct (Appendix G). Behaviour that contravenes the Code of Conduct may be recorded as a low-level concern or, if serious or repeated, escalate to a safeguarding or disciplinary concern. Just as with other low-level concerns, documenting these behaviours helps complete the broader jigsaw, supporting early intervention and maintaining a safe environment for children, young people, and adults at risk.

### 5.2 RESPOND

#### 5.2.1 How to Respond to a Safeguarding Concern

All staff and volunteers should be prepared to support someone who makes a safeguarding disclosure or shares information that raises a safeguarding concern. The following principles should always be followed:

- It is key to **actively listen** to the person sharing and it may be appropriate to ask them if you can take notes of what they are telling you, to ensure you have an accurate record.



- It is important to **show acceptance** of what the person is saying, not questioning the validity of the claims or making judgements about what is shared. Statements such as, “I can’t believe that, are you sure it was X who did that? Maybe it was a joke” are inappropriate and instead reassurance should be given e.g. “Thank you for telling me. This is not your fault. What can I do to help you feel supported?”
- **Never promise confidentiality** or make false promises. You can reassure the person that their information will be handled sensitively and only shared with those who need to know to ensure the safest outcomes for everyone involved. You can reassure them that you will keep them informed of what is happening with their information and help them to understand their rights. If the person who discloses abuse is 18 years of age or older, they have the right to decline it being reported to authorities **unless** the alleged perpetrator is in a potential position to abuse others. It is crucial to note the mental capacity of the adult reporting abuse so that the right to autonomy is respected but their need for protection is considered. Mental capacity is assessed on a decision-by-decision basis and someone making an unwise decision does not necessarily indicate that they lack capacity. If you are concerned that the adult raising a safeguarding concern lacks the capacity to make decisions about what is done with their information, advice should be sought from Thirtyone:eight.
- Consent is not required if there is a potential crime involved; it must be reported to the police. See Section 5.4.2 for more information.
- Leading questions must be avoided however, clarifying questions are helping to gather context and check understanding. An example of a leading question would be: if a disclosure was made by a child that they had been hit and the person listening to this disclosure responded by asking whether it was their father that hit them. The person listening should instead ask the child who has hit them. Helpful information gathering questions include:
  - Can you describe the behaviour(s) or concern(s)?
  - Are there any known additional needs?
  - Are there any outside agencies or people providing care or support and if so, what support are they providing? Do you have permission to speak with them?
  - Is this a recent or non-recent disclosure? When did this happen? What action has already been taken e.g. referrals to statutory services?
  - Who saw or heard this? What did they see or hear?
  - Is there any extra information or known risk factors that would be helpful to know?
  - What support does the person have in place when they leave you today? Is there someone they/you can contact for support, as required?
- It may be helpful to adjust your language when speaking to a child or someone who is struggling to comprehend what you are asking. These questions therefore may sound like:
  - Can you tell me what is worrying you/can you tell me step-by-step what happened?
  - Do you have a social worker/mental health worker/youth worker/teacher that helps or listens to you? What happens when you meet with them? Can I speak to them about the support they give you and/or the things you have told me today? (You may be able to ascertain additional needs via a booking form, from parents/carers if appropriate.)
  - When did this happen to you? Who was told about this? Did anyone else get involved like the police or a social worker?
  - I want to make sure I fully understand what you have told me. Can I check with you who was there at each stage of [disclosure]? What did each person do and when? How did it make you feel then and how do you feel about it now? Don’t worry if you struggle to answer, you are doing your best.
  - Is it possible this could happen again? How safe do you feel? What makes you feel more/less safe? Do you have thoughts about hurting yourself or ending your life? (If yes, ask for further information about intent, plans and protective factors. You may need to seek medical advice at this point via 111).



- It is normal to have tricky feelings after telling someone about [disclosure]. It was really brave of you to tell me. Who will you speak to if you need some support after you leave here? (You can provide signposting information to appropriate organisations.)
- Consider the feelings of the person who discloses information, both in the moment and afterwards. Closing the loop and managing transitions well may help to reduce uncertainty. Let them know what you plan to do with the information they have shared and, as far as possible, confirm when this has been done and what to expect next. See also section 5.4.4 where exceptions may apply. Ensure they have access to support if needed.

## **5.2.2 Responding in an Emergency Situation**

If there is an immediate risk of harm identified, this must be referred without delay directly to the appropriate emergency service by calling 999 (or 112 internationally). For example, if there was imminent risk of harm identified, including but not limited to any violence and significant aggression, the police must be called. If there is a risk to life due to a health need (mental or physical), the ambulance service should be called.

When an urgent social services referral needs to be made, this must be made to the team local to the person of concern's home address. The correct social service can be found by downloading the 'NHS Safeguarding' app and clicking on the bottom button 'Contacts'. You will then be able to choose a region, then a county, and whether it is concerning a child or an adult. This will then lead you to the website of the relevant social service which will provide the contact details for office- and out-of-hours services.

Non-emergency number for the police: 101

Non-emergency number for health: 111

## **5.3 RECORD**

### **5.3.1 Record Keeping Guidance**

The National Council for Voluntary Organisations (NCVO) states that accurate and up-to-date records of safeguarding concerns are essential for a number of reasons:

- They can help you identify concerns at an early stage.
- They can help you identify patterns of concern.
- They can enable you to record seemingly minor issues to build a more complete picture of what a person may be experiencing.
- They help you monitor and manage safeguarding practices, including decision making, actions taken and agreed joint strategies with other agencies.
- They can provide you with evidence to support actions both within your organisation and when working with external agencies.
- They can support you to demonstrate action taken to reduce impact of harm.
- They can provide continuity when staff or volunteers change or are unavailable.

Therefore, all safeguarding records should abide by the following record keeping guidance:

- Keep clear, accurate and legible records. Typed records are ideal but handwritten records must be legible and written in black ink to enable legible photocopying or scanning of documents if required. Rewrite or type up rough notes to form easy to understand records.
- Notes should be written as soon as possible after responding to a safeguarding concern. Contemporaneous notes should be kept during or directly after responding to the concern



and alongside reporting the concern to ensure they are as accurate as possible and contain sufficient details. Notes should be written no longer than 24 hours after the concern is raised.

- Records must be written in such a way that the meaning is clear.
- Abbreviations, jargon, meaningless phrases, or offensive statements must not be included in any records. Direct quotations should be used when pertinent to the record.
- Acronyms may be used only after it is written in full e.g. Safeguarding Officer (SGO), Child and Adolescent Mental Health Service (CAMHS), Ventures and Falcons (VF). Whilst these are well known now or in a specific context, they may not be in the future, and some acronyms have multiple means e.g. SGO can stand for Special Guardianship Order or Safeguarding Officer.
- Use of emojis or colloquial language should be avoided unless it is a direct quote.
- Records should be factual and avoid judgemental language such as “she was attention seeking”, “he seemed to have lost the plot”. Records must be impartial and reflect what was seen and heard, not what the author feels.
- Make records at the time the events happen, or as soon as possible afterwards.
- CPAS keeps a separate safeguarding record for each person, leader or member. When recording incidents, they must be uploaded to each individual’s record. On CPOMS this can be done by entering additional names into the ‘Linked Student’ field.
- Always use full names (where known). If someone is known as ‘Jake Hunt’ but their name is ‘Jacob Hunt’, you must record Jacob Hunt on the safeguarding file and can reference that they are known as ‘Jake’. This supports search functions on the Online Booking System (OBS), safeguarding records, and engagement with outside agencies.
- When printing off/uploading emails, press ‘forward’ and copy and paste all the sending information as well as the message. This will then show the times and dates, as well as the recipients. It can be useful to write up a summary and conclusion of the content of large email trails or multiple conversations regarding a safeguarding concern to provide clarity to the reader.
- Document your decision-making process in the secure safeguarding record (e.g. CPOMS) as well as your rationale for the decision reached. It is important to evidence your decision-making processes so that they are clear if later queried or investigated. Your record should be clear enough that someone in the future without your contextual knowledge can understand the context of what is written as well as how and why you took the action/reached the decision you did. This level of clarity is also useful if you are asked in several years’ time to justify your actions.
- In the event of an error being made on a printed or handwritten record, entries must be corrected by striking the error through with one line, and applying the author’s initials, time, and date alongside the correction. The original entry should still be able to be read clearly. Errors must not be amended using white correction fluid, permanent marker, scribbling out or writing over the original entry. Any edits to CPOMS records will have an audit trail.
- Poor practice concerns should be recorded as well as instances of more serious abuse. This is because, if you don’t address them, frequent poor practice incidents can escalate into more serious situations.
- Records should note relevant details such as a person’s demeanour or what they are wearing, as these can all be tell-tale signs of abuse. Patterns of behaviour are also a good way to check wellbeing.
- Records must never be falsified.
- All safeguarding records must be kept in safe storage with restricted access.



## 5.4 REPORT AND REFER

Report and Refer relate to the internal (report) and external (refer) sharing of information as a result of a safeguarding concern being handled. Each safeguarding concern should be reported to the person immediately responsible for safeguarding in the area of CPAS delivery whilst being mindful of good information sharing practice.

### 5.4.1 Information Sharing Guidance

Learnings from Serious Case Reviews often find that there was valuable information which was not effectively shared and this led to harm. CPAS is committed to engaging with statutory services for the purpose of promoting safety for those they serve. The following guidance should be referenced with regards to sharing information:

- Information should be shared on a need-to-know basis. Safeguarding always trumps data protection. Best practice in data protection should still be followed whenever possible in making a safeguarding referral. However, information should always be shared where needed.
- If you share confidential information with or without consent, you must record the reasons for your decision. You must record any steps you have taken to seek consent, or your reasons for not doing so, and details of any advice you have received.
- When you share information or glean it from someone else, you must record the full name of the person(s) involved, their contact details (if known), what information was shared, and method of communication e.g. email. It is important to always record your rationale for sharing, or not sharing, information.
- CPAS staff must encrypt emails that include sensitive information by typing “encrypted” anywhere in the subject line. This will then allow the recipient to log in to view the email and reply to it securely. All volunteers and stakeholders are asked not to send sensitive information in an initial email, but to give an outline of the concern and request CPAS send them an encrypted email that they can reply to with the sensitive information.
- Remember that any record can be requested by the person it is concerning via a Subject Access Request. Police and/or solicitors may also require records to be shared (often redacted versions). Consider this when you are creating the record and the tone used.

### 5.4.2 Consent

Consent is the permission given by someone to do something or for something to happen. Wherever possible, always seek consent from the person involved in the safeguarding concern for the next steps to be taken. Be open and honest with the person about why, what, how, and with whom their information will be shared. For example, are you making a referral because you think they are at risk of harm or are you letting people know for information only? Always record consent within the safeguarding record.

If you decide to share information after the person refuses permission, you must explain to them why you have made the decision to share without their permission.

Five safeguarding reasons you may share information without consent:

- If you think a person is at serious risk of harm or abuse, including harming themselves.
- If you receive information which indicates that a serious crime has been or is going to be committed.
- If you are required to by law. For example, for some professions, any suspicion of forced marriage or female genital mutilation.
- If you think the person lacks the mental capacity to decide and have agreed with a safeguarding consultant that it would be in the individual's best interest.



- If an individual gives information which indicates a possible terrorist threat.

If consent to share information is not given, you must still document as usual. You must then record the rationale for not sharing information due to lack of consent or why you were justified to share without consent.

The Government has confirmed its intention to introduce a statutory duty of mandatory reporting in relation to child sexual abuse. Further statutory guidance is expected, and this section of the policy will be reviewed and updated in line with legislative requirements and published guidance as they come into force.

#### **5.4.3 Where to Report and Refer**

- For members, visitors and/or volunteers on a Venture or Falcon holiday, they should report to the Safeguarding Officer or Deputy. The Safeguarding Officer or Deputy should then inform the Safeguarding Manager via reporting on CPOMS (or calling the VF Office if indicated, as per The Safeguarding Officers Handbook). Safeguarding Officers and Deputies are also responsible for seeking safeguarding consultation from Thirtyone:eight, as required, and making any onward referrals as advised. This would include, but is not limited to, referrals to social services.
- On a recruitment panel that a Patronage staff member is part of, they should report to both the Diocesan Safeguarding Officer and the CPAS Safeguarding Manager.
- For the Leadership team, they should inform the person responsible for safeguarding on an event site as well as the CPAS Safeguarding Manager.
- For all other CPAS staff and stakeholders, all reports should be made directly to the Safeguarding Manager. All reports made via [safeguarding@cpas.org.uk](mailto:safeguarding@cpas.org.uk) are monitored by the Safeguarding Manager, VF Principal and Director for Operations and Finance.

NB. If the report is regarding or is inappropriate to be shared with the Safeguarding Manager, reports can be made to the Director of Operations and Finance (as line manager to Safeguarding Manager and Deputy Safeguarding Lead), the CEO (as Lead for Safeguarding), or the Safeguarding Trustee.

#### **5.4.4 Duty to Report to Statutory Agencies and Information Sharing**

CPAS recognises its statutory and moral duty to report safeguarding concerns to the appropriate statutory agencies, including children's social care, Local Authority Designated Officer (LADO) and the police, where a child or adult may be at risk of harm. Decisions to refer concerns will always prioritise the safety and welfare of those involved and will be made in line with statutory guidance and this Safeguarding Policy. While the CPAS Safeguarding Team has oversight of referrals to statutory services and subsequent actions, volunteers may, where appropriate, make the initial referral.

Once a concern has been referred, there may be occasions where the organisation is advised that information must be limited or cannot be shared with those involved, including children, young people, parents or families, while enquiries or investigations are ongoing. This may include situations where the organisation is unable to comment on, or discuss, specific details of a case.

CPAS recognises that this lack of communication can be distressing and frustrating for those affected. However, such restrictions are necessary to protect individuals, preserve the integrity of investigations, and comply with statutory and legal requirements. Where possible and appropriate, CPAS will seek to offer reassurance, pastoral support and clear information about processes, while respecting the boundaries set by statutory agencies.





#### **5.4.5 Raising a Safeguarding Concern about a Member of Staff or Volunteer**

CPAS wants to empower all staff and volunteers to be able to report any concerning behaviour they witness or become aware of regarding a member of staff or volunteer. Whilst we recognised it may be uncomfortable to report a safeguarding concern about a colleague or peer, the act of not reporting a concern can cause further harm and must be avoided. CPAS is committed to protecting those who make genuine reports to prevent them from being harmed for doing so. The guidance within section 5 remains relevant when managing a safeguarding concern regarding a member of staff or volunteer.

#### **5.4.6 Safeguarding Escalation Pathway**

CPAS actively seeks to create an environment where there is open and honest dialogue about how well our safeguarding processes are working and how well our staff team are delivering them. If a member of staff or volunteer has concerns about how a CPAS staff member is discharging their safeguarding duties they are encouraged to raise their concerns with a more senior member of the CPAS team within the escalation pathway (see Appendix D). This can be done using the following contact details:

[safeguarding@cpas.org.uk](mailto:safeguarding@cpas.org.uk) – accessible to Elspeth Young, Tim Friend, Val Floy, and Jacqueline Titmas.

[jscamman@cpas.org.uk](mailto:jscamman@cpas.org.uk) – John Scamman (CEO)

[eyoung@cpas.org.uk](mailto:eyoung@cpas.org.uk) – Elspeth Young (Safeguarding Manager)

[jtitmas@cpas.org.uk](mailto:jtitmas@cpas.org.uk) – Jacqueline Titmas (Deputy Safeguarding Manager)

[tfriend@cpas.org.uk](mailto:tfriend@cpas.org.uk) – Tim Friend (VF Principal)

[vfloy@cpas.org.uk](mailto:vfloy@cpas.org.uk) – Val Floy (Director of Operations and Finance)

Staff should also be aware of escalation routes provided by the Grievance and Whistleblowing policies and procedures.

Trustees support the right of individuals to report concerns directly and in confidence to the designated Safeguarding Trustee who will take action as appropriate. You can do so by emailing [safeguardingtrustee@cpas.org.uk](mailto:safeguardingtrustee@cpas.org.uk).

Individuals are also free to contact an external agency (such as Thirtyone:eight) on 0303 003 1111.

#### **5.4.7 Recording, Reporting and Referring a Safeguarding Concern**

The individual processes for recognising, responding, recording, reporting and referring a safeguarding concern differ depending on which team within the organisation is involved. The specific process for each team can be found in Appendix E.

All external concerns should be reported directly via the contact details for the Safeguarding Team at CPAS and if necessary, Safeguarding Consultants in section 6.



## 6. Helpful links and contacts

Helpful links for support and advice can be found in Appendix F.

### Contacting CPAS

CPAS Office

Phone: 0300 123 0780

Email: General enquiries: [info@cpas.org.uk](mailto:info@cpas.org.uk) | Safeguarding enquiries: [safeguarding@cpas.org.uk](mailto:safeguarding@cpas.org.uk)

### Ventures and Falcons central team:

Phone: 0300 123 0780, option 1

Email: [ventures@cpas.org.uk](mailto:ventures@cpas.org.uk)

### External Safeguarding Consultant:

Thirtyone:eight

<https://thirtyoneeight.org/>

Helpline: 0303 003 1111





## Appendix A – Definitions

### Definition of Abuse

The following definitions are taken from Working Together to Safeguard Children 2018 and guidance written by The Ann Craft Trust and The NSPCC.<sup>6</sup>

#### Abuse

A form of maltreatment of a person. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. People may be abused in a family or in an institutional, care or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by someone of any age.

#### Physical abuse

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

There are a number of physical signs to look out for:

- Cuts.
- Bruises.
- Burns.
- Restraint or grip markings.
- Black eyes.
- Unusual behaviour, such as repeated trips to the hospital.

Many victims of physical abuse may feel responsible for their abuse. Or they may fear the shame of discovery, or further attacks from their abuser. As such, they may attempt to cover up the marks left by the abuse. So, you should also be on the lookout for signs that the person has something they're trying to hide. For example, they may wear more makeup than usual to cover a bruise. Or they may take to wearing long-sleeved tops, even in warm weather.

#### Emotional abuse

The persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to a person 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 person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It can include threats of harm or abandonment, deprivation of contact or refusal of visitors, restricting personal choice and refusing to respect privacy. It may involve blaming, controlling or intimidating behaviour, coercion and harassment, belittling or humiliation. It may also involve the removal of mobility or communication aids, or intentionally leaving someone unattended when they need assistance or forced isolation, or withdrawal from services or support networks. It may feature age or developmentally inappropriate expectations being imposed on the person. 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 person 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 the person to frequently feel frightened or in danger, or the exploit them. Some level of emotional abuse is involved in all types of abuse, though it may occur alone.

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<sup>6</sup> Working Together to Safeguard Children, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf), (The Department of Education, March 2019), pp 102-104.



Any of these could indicate that emotional and psychological abuse is taking place:

- An air of silence or discomfort when a particular person is present.
- Withdrawal, or a change in the psychological state of the person.
- A change of appetite, or unexplained weight loss or gain.

In addition to these, certain signs may be a bit harder to spot. Some signs of distress, like tears and anger, are obvious. But victims of psychological abuse may develop low self-esteem and insomnia.

### **Sexual abuse**

Involves forcing or enticing a person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the person 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 the victim in looking at, or in the production of, sexual images, watching sexual activities, encouraging a child or adult at risk of harm to behave in sexually inappropriate ways, or grooming a child or adult at risk of harm in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children.

There are a number of physical signs to look out for:

- Cuts, bruises and marks – particularly to the thighs, buttocks, upper arms, and neck.
- Irritation, pain or bleeding in the genital area.
- Torn, stained, or bloody underclothing.
- Unprecedented difficulty walking or sitting.
- Infections, STDs, or unexplained genital discharges.
- Pregnancy (if the woman is unable to consent to sexual intercourse).
- Incontinence that's not related to any medical diagnosis.

In addition to these, there are some other, more subtle signs to look out for. For instance, a person might start using explicit sexual language. Or they might demonstrate significant changes in their behaviour and attitude towards sex. They might seem distant and listless. They may also develop sleeping problems.

And even if there are no physical signs of sexual abuse, abusers still leave their mark. The victim might refuse help with personal care. They might also be reluctant to be alone with certain people. Some victims of sexual abuse even start to self-harm.

In the long-term, a victim of sexual abuse may develop an aversion to forming any intimate relationships.

Babies and pre-school children who are being emotionally abused may:

- Be overly-affectionate towards strangers or people they haven't known for very long.
- Not appear to have a close relationship with their parent, for example when being taken to or collected from nursery.
- Lack confidence or become wary or anxious.
- Be unable to play.
- Be aggressive or nasty towards other children and animals.

Older children may:

- Use language, act in a way or know about things that you wouldn't expect for their age.
- Struggle to control strong emotions or have extreme outbursts.
- Seem isolated from their parents.
- Lack social skills or have few, if any, friends.
- Fear making mistakes.
- Fear their parent being approached regarding their behaviour.



- Self-harm.

### **Child sexual exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation can be very difficult to identify. Young people who are being sexually exploited may:

- Go missing from home, care or education.
- Be involved in abusive relationships.
- Hang out with groups of older people.
- Be involved in gangs or anti-social groups.
- Have older boyfriends or girlfriends.
- Spend time at places of concern, such as hotels or known brothels.
- Be involved in petty crime such as shoplifting
- Have access to drugs and alcohol.
- Have new things such as clothes and mobile phones, which they aren't able to easily explain.
- Have unexplained physical injuries.

### **Radicalisation**

Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It is in itself a form of harm.

All organisations that work with children and young people have a responsibility to protect children from being harmed by radicalisation and exposure to extremist views.

If a child or young person is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group or cause. For example, they may:

- spend increasing amounts of time talking to people with extreme views (this includes online and offline communication)
- change their style of dress or personal appearance
- lose interest in friends and activities that are not associated with the extremist ideology, group or cause
- have material or symbols associated with an extreme cause
- try to recruit others to join the cause

### **Child Criminal Exploitation**

Child criminal exploitation is a form of child abuse where a child or young person is forced or coerced to engage in criminal activity or commit any type of crime. County lines is a form of criminal exploitation where highly organised criminal networks, often in the form of gangs, persuade, coerce or force children and young people to store or move drugs and money. Children may be forced to move drugs or money around their local area or transport them outside their local area to suburban areas, market towns and coastal towns.

Children and young people might be exposed to, or forced to use, a wide variety of weapons. This includes knives, firearms and harmful sprays and liquids such as CS spray or acids.

Guidance from the Home Office and the Ministry of Justice suggests that the following signs may indicate that a child is experiencing child criminal exploitation:



- frequently going missing from school, home or care
- travelling to locations, or being found in areas they have no obvious connections with, including seaside or market towns or locations within their urban area that they are unfamiliar with
- unwillingness to explain their whereabouts
- acquiring money, clothes, accessories or mobile phones which they seem unable to account for
- receiving excessive texts or phone calls at all hours of the day
- having multiple mobile phone handsets or sim cards. This might also include smart phones which can use applications for communication that don't need a phone number
- appearing anxious or secretive about their online activities and receiving or sending money, gifts or gaming currency to someone online
- withdrawing or having sudden changes in personality, behaviour or the language they use
- having relationships with controlling or older individuals and groups
- unexplained injuries
- carrying weapons
- significant decline in school results or performance
- being isolated from peers or social networks
- associating with or being interested in gang culture
- self-harming or having significant changes in mental health.

### **Female genital mutilation**

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. The age at which FGM is carried out varies. It may be carried out when a child is new-born, during childhood or adolescence, just before marriage or during pregnancy (Home Office et al, 2016). There are no medical reasons to carry out FGM. It's dangerous and a criminal offence. Spotting the signs of female genital mutilation:

- A child at risk of FGM may not know what's going to happen. But they might talk about or you may become aware of:
- A long holiday abroad or going 'home' to visit family.
- Relative or cutter visiting from abroad.
- A special occasion or ceremony to 'become a woman' or get ready for marriage.
- A female relative being cut – a sister, cousin or an older female relative such as a mother or aunt.
- Missing school repeatedly or running away from home.

A child who has had FGM may:

- Have difficulty walking, standing or sitting.
- Spend longer in the bathroom or toilet.
- Appear withdrawn, anxious or depressed.
- Have unusual behaviour after an absence from school or college.
- Be particularly reluctant to undergo normal medical examinations.
- Ask for help but may not be explicit about the problem due to embarrassment or fear.

Reporting requirements:

Regulated health and social care professionals and teachers in England and Wales must report 'known' cases of FGM in under-18s to the police (Home Office, 2016).

### **Neglect**

Examples of neglect in children include:

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of their health or, in the case of a child, their development. Neglect may occur during pregnancy as a result of maternal substance abuse. 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 caregivers).
- Ensure access to appropriate medical care or treatment.
- Respond to a child's basic emotional needs.

Neglect can be difficult to identify. Isolated signs may not mean that a child is suffering neglect, but multiple and persistent signs over time could indicate a serious problem. Some of these signs include:

- Children who appear hungry - they may not have lunch money or even try to steal food.
- Children who appear dirty or smelly.
- Children whose clothes are inadequate for the weather conditions.
- Children who are left alone or unsupervised for long periods or at a young age.
- Children who have untreated injuries, health or dental problems.
- Children with poor language, communication or social skills for their stage of development.
- Children who live in an unsuitable home environment.

Examples of neglect in adults include:

- Ignoring medical or physical care needs.
- Ignoring a person's cultural, religious or ethnic needs.
- Failing to provide access to appropriate health, social care, or educational services.
- Withdrawing the necessities of life, such as medication, glasses, hearing aids, dentures, adequate nutrition, and heating.
- Refusing access to visitors.
- Ignoring or isolating a person.
- Preventing a person from making their own decisions.

Everyone deserves privacy and dignity. We all have a long list of requirements that need to be met to secure our health, safety, and happiness. Neglect and acts of omission basically mean failing to ensure an adult at risks' privacy, dignity, and individuality.

**Spot the Signs of Neglect and Acts of Omission:**

A number of warning signs may suggest that an adult at risk of harm is suffering from neglect. Some of these are physical, and some are environmental.

Here are some things to look out for:

- A dirty, cluttered or unhygienic environment.
- Pressure sores or ulcers, as well as other untreated injuries and medical problems.
- An accumulation of untaken medication.
- A generally poor physical condition, or poor personal hygiene.
- Unexplained weight loss, or other signs of malnutrition.
- Inappropriate or inadequate clothing.

In addition to these, some signs of neglect and acts of omission are a bit more subtle. For instance, an individual may start behaving in certain uncharacteristic ways. They may stop engaging in social interaction or fail to show up to medical and social care appointments.

### **Self-Neglect**

Examples of self-neglect include:

- A refusal or inability to cater for basic needs, including personal hygiene and appropriate clothing.
- Neglecting to seek assistance for medical issues.
- Not attending to living conditions – letting rubbish accumulate in the garden, or dirt to accumulate in the house.
- Hoarding items or animals.

### **Modern Slavery**

Modern slavery encompasses:



- Slavery.
- Human trafficking.
- Forced labour and domestic servitude.
- Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

#### Who is at Risk of Modern Slavery?

The Home Office has a document entitled [“Modern Slavery: How the UK is Leading the Fight.”](#) In this document, they list a number of factors that might make a person at risk of becoming a victim of modern slavery. Factors include poverty, limited opportunities at home, lack of education, unstable social and political conditions, economic imbalances, and war.

[People with learning disabilities are also at risk of getting coerced into modern slavery.](#) They could be isolated in their communities. They may be ineligible for support services. Or they may simply get overlooked if they are not viewed as a high-profile concern.

#### Spotting the Signs of Modern Slavery:

The problem is that victims of modern slavery are hard to spot. Modern slave masters go to great lengths to keep their activities secret. They also isolate their victims while restricting their movements. This makes it very difficult for them to get help.

But there are some signs you can look out for. Some of them are obvious, and some are a little more subtle:

- The person looks uneasy, unkempt, or malnourished. They may also have untreated injuries.
- The person does not speak for themselves, and someone else pays for all their travel and food.
- Have you noticed someone picked up and dropped off from work or another location at odd times?
- Is the person able to tell you their own address?

Not all of these signs indicate that the person is a victim of modern slavery. But any one sign indicates that an investigation may be in order.

#### What To Do if You Suspect Modern Slavery is Happening in Your Area?

It's always worth raising your concerns.

[The Salvation Army](#) has a 24/7 confidential helpline where you can share your concerns and get the help you need. It's **0300 303 8151**.

But modern slavery is a serious crime. So, if you think someone is in immediate danger, or if the individual is under 18, call the police on **999**. They'll take your concerns very seriously indeed, and they'll treat the case as a matter of urgency.

#### Financial Abuse

The Care Act 2014 describes 'financial abuse' as a type of abuse which includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused.

#### What is financial abuse?

While the Care Act 2014 definition is clear, financial abuse take many forms. It's a type of abuse that can start subtle and is often hard to detect.

When defining financial abuse, we know there are many elements at play. It is true that financial abuse often involves or is associated with:

- Someone taking or misusing someone else's money or belongings for their own gain.
- Harming, depriving or disadvantaging the victim.
- Controlling someone's purchases or access to money.



- Often associated with other forms of abuse.
- Doesn't always involve a crime like theft or fraud.

### Types of financial abuse

What financial abuse looks like can vary which can make it difficult to detect and identify. As the Care Act 2014 definition shows, financial abuse can be concerning money, property or belongings.

Financial abuse might look like:

- Borrowing money and not giving it back.
- Stealing money or belongings.
- Taking pension payments or other benefit away from someone.
- Taking money as payment for coming to visit or spending time together.
- Forcing someone to sell their home or assets without consent.
- Tricking someone into bad investments.
- Forcing someone to make changes in wills, property or inheritance.

### Signs of financial abuse

If you suspect that you, or someone you know, might be a victim of financial abuse, here are some of the behaviours and signs that might suggest financial abuse could be happening:

- Unexplained money loss.
- Lack of money to pay for essentials such as rent, bills and food.
- Inability to access or check bank accounts and bank balance.
- Changes or deterioration in standards of living e.g. not having items or things they would usually have.
- Unusual or inappropriate purchases in bank statements.
- Isolation and withdrawal from friends and family.
- Lack of things you'd expect someone to be able to afford e.g. TV, grooming items, clothing.

### Spiritual Abuse

CPAS also acknowledges that whilst spiritual abuse is not an officially recognised category of abuse, it is a form of behaviour that faith communities are increasingly attentive to, with potential for it to impact our staff and stakeholders. Spiritual abuse can be understood as a form of coercive control exercised in a spiritual or faith context. It can encompass multiple forms of abuse, when spiritual or religious beliefs are used to hurt, scare, demean or control – including forced participation in spiritual or religious practices. This often involves the manipulation of scripture and may also include stonewalling behaviours.





## Appendix B – Safeguarding and Theology

As an evangelical mission agency, CPAS' commitment to safeguarding is born of their understanding of and commitment to the gospel and commitment to the teaching of Scripture and the good news of Christ. In particular, they affirm the following from Protecting All God's Children (2010) – the numbering is preserved from that document.

'1.6 Every human being has a value and dignity which comes directly from the creation of male and female in God's own image and likeness. Christians see this potential fulfilled by God's re-creation of us in Christ. Among other things this implies a duty to value all people as bearing the image of God and therefore to protect them from harm. Christ saw children as demonstrating a full relationship with God. He gave them status, time and respect.'

'1.7 Every person is equally precious to God. Each one needs the assurance that respect for this brings. Individuals who suffer abuse often experience a loss to their identity and worth; there is often shame and a misplaced guilt. The Church is intended to be a place where men, women and children, including those who are hurt and damaged, may find healing and wholeness. It is our calling to be agents of healing and recovery in such a way that enables all who have suffered from abuse to lead lives with dignity in a context that is as safe as possible. It is about speaking words of peace. It is communication of "shalom"; that is, of justice, healing and peace for the whole of the individual, as well as for the community.'

'1.8 God is present and at work in the world in many ways. A Church empowered by the Holy Spirit is especially a place where the wonderful character of God is manifested. The Church is called to witness to that truth. As individual Christians and as part of the Church, our vocation is to reflect the character of God. We are called to welcome and care for the oppressed, the marginalized, and the victims of injustice. Safeguarding good practice concerns the development of safer expressions of care to all and underpins the love and welcome of God for all people.'

'1.9 Justice is part of the outworking of love. The Church must hold in tension concerns for both justice and compassion. Nevertheless, those who have suffered child abuse have sometimes found an unsympathetic hearing. They may be disbelieved, discouraged and damaged further. Some people may side with the alleged perpetrator. This occurs in all parts of society, but it is particularly hurtful when it occurs within the Church. Such actions compound the sense of injustice that many feel. In answer to the question "What does God require of us?" the need to act justly is set alongside the need to love mercy and to walk humbly with God (Micah 6.8).'





## Appendix C – List of legal framework in section 3.3

This policy has been drawn up on the basis of law and guidance that seeks to protect children and vulnerable groups, namely:

- Children Act 1989 and 2004.
- United Nations Convention on the Rights of the Child 1991.
- Data Protection Act 2018.
- Equality Act 2010.
- Human Rights Act 1998.
- Sexual Offences Act 2003.
- Safeguarding Vulnerable Groups Act 2006.
- Protection of Freedoms Act 2012.
- Children and Families Act 2014.
- Care Act 2014.
- Children and Social Work Act 2017.
- Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisation which work with and support children and young people who have special educational needs or disabilities: HM Government 2015.
- Information sharing: Information sharing advice for safeguarding practitioners HM Government 2018.
- Working together to safeguard children; a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015, 2018 and 2023.
- Safeguarding and protecting people for charities and trustees; Charity Commission for England and Wales 2018.
- Further guidance has been sought from The Ann Craft Trust, NSPCC, Lucy Faithful Foundation, and The National Council for Voluntary Organisations (NCVO).



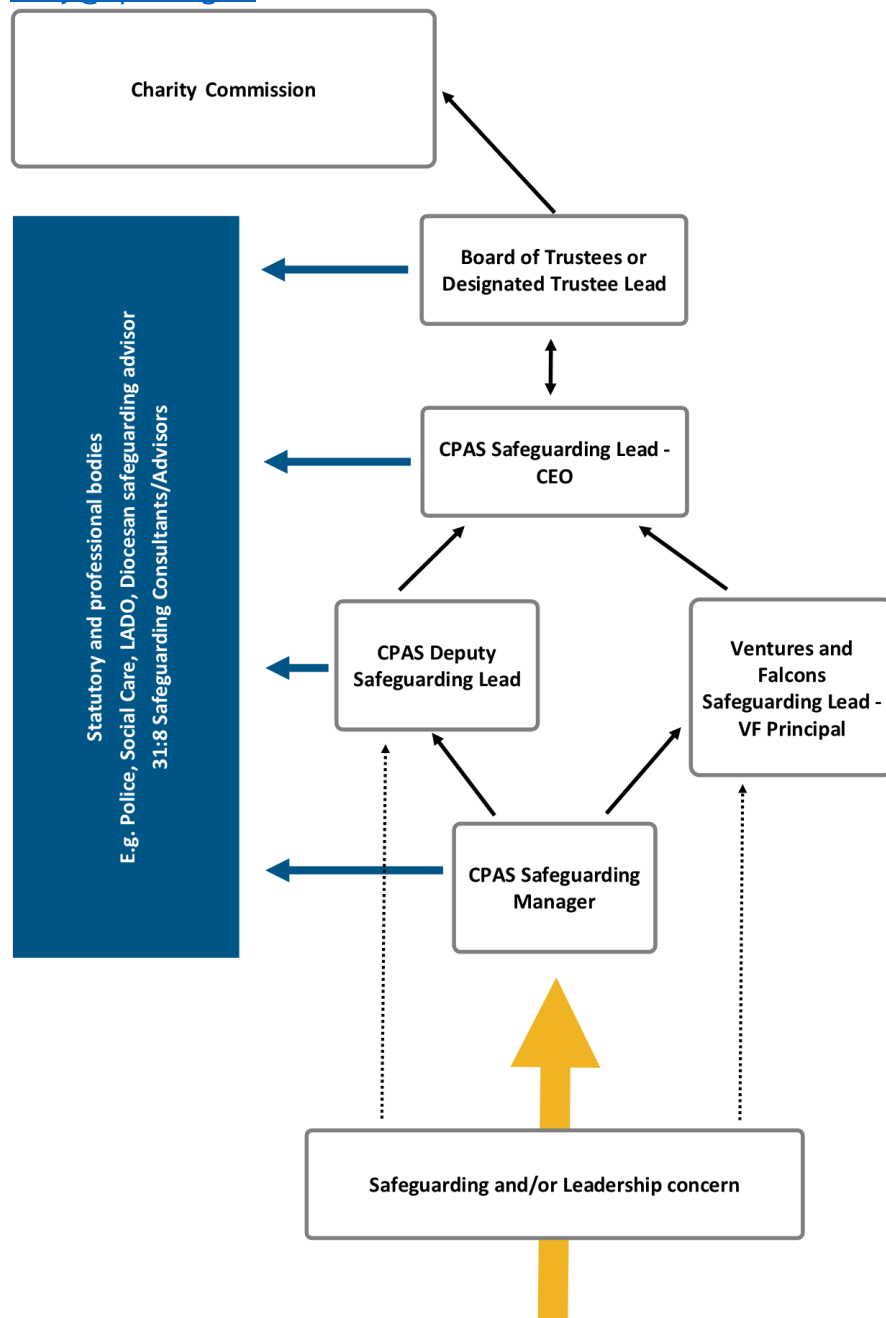
## Appendix D – Safeguarding Escalation Pathway

This flowchart sets out the major referral pathways to escalate safeguarding disclosures within CPAS. We recognise there is a complex interplay between leadership concerns and safeguarding, therefore we encourage all concerns to be raised in the first instance via the Safeguarding Escalation Pathway.

If the Safeguarding Manager is unavailable, concerns can be raised with the CPAS Deputy Safeguarding Lead or VF Principal.

For more detailed procedures within the Ventures and Falcons team, see the Safeguarding Officers Handbook.

Whistleblowing disclosures should follow the CPAS Whistleblowing Policy and be made to [vfloy@cpas.org.uk](mailto:vfloy@cpas.org.uk) in the first instance.



## **Appendix E – Team Specific Processes for Handling Safeguarding Concerns**

### **Ventures and Falcons (VF)**

VF staff should follow guidance under 'All other staff' section.

VF Volunteers must follow the process for Recognition, Responding, Recording, Reporting and Referring as set out in the Safeguarding Officer Handbook. A brief overview of the support structures in place for VF holidays is as follows:

Our Ventures and Falcons residential holidays have a minimum of 1 Safeguarding Officer and 1 Deputy Safeguarding Officer who are responsible for handling all safeguarding incidents and concerns initially. The detailed processes for managing safeguarding incidents are detailed in the Ventures and Falcons Safeguarding Officer Handbook. In summary, Safeguarding Officers and Deputies will record all safeguarding concerns on CPOMS (Child Protection Online Management System) and as appropriate make a call to Thirtyone:eight and/or the Safeguarding Manager. The cases recorded on CPOMS are monitored by CPAS staff and actions are recorded or advised as necessary. Where a child is at risk of harm, then escalation will be made to the police or social care and CPAS will be advised.

An Out-of-hours (OOHs) Phone number operates 24 hours a day for the duration of any VF residential holiday (including School Ventures but excluding day events). There is a 2-tier support system where VF staff receive these calls and have a rota of members of the Safeguarding Committee whom they can seek support and advice from, as required. Any OOHs call received is logged on an OOHs call log sheet and filed securely and electronically. This log sheet includes a note as to whether additional follow up is needed. Such action would be taken by either the member of staff who took the call, the VF Lead, VF Principal, or Safeguarding Manager, as appropriate. These actions taken are quality assured by the VF Lead (for operational concerns) and Safeguarding Manager (for safeguarding concerns).

Any safeguarding concerns or incidents raised during a Venture or Falcon holiday or activity are recorded on a Safeguarding Incident Log Form. VFC036 is the code for the paper form, which is submitted to CPOMS by the Safeguarding Officer or Deputy Safeguarding Officer on residential holiday and sent securely to the VF Office and uploaded to CPOMS by Holiday Coordinators for safeguarding incident that occur during 'Other Events'. In both instances, once the information is uploaded to CPOMS, the paper form is securely destroyed.

If an OOHs was also made, the two records are linked to ease retrieval of the relevant information.

Volunteers do not need consent from the person that the safeguarding incident is concerning to share it with the Safeguarding Officer or Deputy and should do so in all cases.

### **Operating Documents Covering Venture and Falcon Holidays and Activities and CPAS Processes and Procedures**

The following handbooks cover the processes and procedures relating to the operational implementation of CPAS safeguarding policies and practices. These handbooks are updated each year, and the Safeguarding Co-ordinator handbook undergoes a regular external review by our safeguarding consultant, thirtyone:eight:

- Overall Leader Handbook
- Safeguarding Officer's Handbook (which includes policy, procedures and guidance on safeguarding, safer recruitment of volunteers, training requirements for volunteers and the expectation and care of members)
- Healthcare Co-ordinators Handbook
- Safety Officer's Handbook
- Activity Co-ordinator's Handbook



The CPAS trustees regularly review CPAS' safeguarding operations, including testing process and information flows using potential safeguarding scenarios.

### **Leadership Team**

Each team should follow Section 5 of this policy. It is recognised that due to the varied ministry streams of CPAS, team specific guidance has been written to guide the handling of safeguarding concerns.

Should a disclosure be made during an online or in-person event, or reports of concerning behaviour heard or observed, a contemporaneous record should be taken. Support and comfort should be offered and/or arranged, as appropriate.

Should the event be held within a church or site that has a safeguarding lead/team and a safeguarding incident occurred on site or involving a person connected to the site, this information must be reported to the safeguarding lead/team. For example, should an event be run in a church and a disclosure is made by a delegate regarding abuse perpetrated by the Vicar, this must be reported to the Parish Safeguarding Officer and/or the Diocesan Safeguarding Advisor. The Church Safeguarding Team will then be responsible for making onward referrals. The observation or disclosure should also be reported to the CPAS Safeguarding Manager to ensure a record is kept of the concern, the people it was reported to, and any actions taken.

When a safeguarding concern is observed or disclosed during an online event, any immediate risk should be addressed, such as following an incident where a delegate makes abusive comments which could cause harm to another person. This scenario would require the person making an abusive comment to be removed from the event and supported separately. Support should be offered to those who may have been affected by the abusive comments. This incident should be reported to the CPAS Safeguarding Manager. Should the person making the abusive comments be in a position of trust, onwards referrals may need to be made and/or reporting to relevant organisation e.g. reporting the church safeguarding team should there be a concern about a church leader's conduct.

Where a delegate or associate discloses abuse, whether current or historic, this must be reported to the CPAS Safeguarding Manager or Thirtyone:eight. Should Thirtyone:eight be contacted and they advise actions, these should be actioned by the staff member making the call. Contemporaneous records must be kept of all actions taken, information that is shared and with whom. These records must be shared with the Safeguarding Manager who will then make any outstanding onward referrals. All Thirtyone:eight consultations are shared with the recipients of [safeguarding@cpas.org.uk](mailto:safeguarding@cpas.org.uk). Signposting to support wherever possible is advised.

Should a disclosure or concern be recognised regarding another CPAS member of staff or volunteer, this must be reported to the CPAS Safeguarding Manager or Thirtyone:eight. All records must be shared with the CPAS Safeguarding Manager who will then make any outstanding onward referrals. Should there be a concern about the CPAS Safeguarding Manager or it is otherwise inappropriate to consult with the CPAS Safeguarding Manager regarding the safeguarding concern, the Safeguarding Escalation Pathway should be used to advise on an alternative person to report to.

### **Patronage Team**

Each team should follow Section 5 of this policy. It is recognised that due to the varied ministry streams of CPAS, team specific guidance has been written to guide the handling of safeguarding concerns.

Should a safeguarding concern be identified during an application and/or interview process, this will be reported to the Diocesan Safeguarding Advisor. Whilst the church safeguarding processes will be followed in the management of the safeguarding concern, this should still be reported to the CPAS Safeguarding Manager. This will ensure that records are kept of what the CPAS staff member witnessed and any actions taken.



In the event that a Patronage staff member is preaching or representing CPAS at a church, PCC meeting, or similar, and a disclosure of abuse is made, or a safeguarding concern is observed, this must be reported to the Parish Safeguarding Officer and/or Diocesan Safeguarding Advisor who will action the management of the concern. This should also be reported to the CPAS Safeguarding Manager. This will ensure that records are kept of what the CPAS staff member witnessed and any actions taken.

Should a disclosure or concern be recognised during a phone call with a member of the Patronage staff, advice should be sought from the CPAS Safeguarding Manager or Thirtyone:eight. A record of the notes taken should be shared with the CPAS Safeguarding Manager who will then make any outstanding onward referrals. All Thirtyone:eight consultations are shared with the recipients of [safeguarding@cpas.org.uk](mailto:safeguarding@cpas.org.uk).

Should a disclosure or concern be recognised regarding another CPAS member of staff or volunteer, this must be reported to the CPAS Safeguarding Manager or Thirtyone:eight. All records must be shared with the CPAS Safeguarding Manager who will then make any outstanding onward referrals. Should there be a concern about the CPAS Safeguarding Manager or it is otherwise inappropriate to consult with the CPAS Safeguarding Manager regarding the safeguarding concern, the Safeguarding Escalation Pathway should be used to advise on an alternative person to report to.

### **All Other Staff**

Each team should follow Section 5 of this policy. It is recognised that due to the varied ministry streams of CPAS, team specific guidance has been written to guide the handling of safeguarding concerns.

Should a disclosure or concern be recognised during a phone call with a member of CPAS staff, advice should be sought from the CPAS Safeguarding Manager or Thirtyone:eight. A record of the notes taken should be shared with the CPAS Safeguarding Manager. All Thirtyone:eight consultations are shared with the recipients of [safeguarding@cpas.org.uk](mailto:safeguarding@cpas.org.uk).

In the event that a staff member is preaching or representing CPAS at a church, PCC meeting, or similar, and a disclosure of abuse is made or a safeguarding concern is observed, this must be reported to the Parish Safeguarding Officer and/or Diocesan Safeguarding Advisor who will action the management of the concern. This should also be reported to the CPAS Safeguarding Manager. This will ensure that records are kept of what the CPAS staff member witnessed and any actions taken.

Should a disclosure or concern be recognised regarding another CPAS member of staff or volunteer, this must be reported to the CPAS Safeguarding Manager or Thirtyone:eight. All records must be shared with the CPAS Safeguarding Manager who will then make any outstanding onward referrals. Should there be a concern about the CPAS Safeguarding Manager or it is otherwise inappropriate to consult with the CPAS Safeguarding Manager regarding the safeguarding concern, the Safeguarding Escalation Pathway should be used to advise on an alternative person to report to.



## Appendix F – Useful Links, References and Contacts

### Useful Documents

#### **Strategy for Dealing with Safeguarding Issues in Charities**

Charity Commission for England and Wales (2013; updated 2017)

[Read online](#)

#### **Promoting a Safer Church: The Church of England's Safeguarding Policy Statement for Children, Young People and Adults**

Church of England (2006)

[Read online](#)

#### **Promoting a Safe Church (Full Policy)**

Church of England (2006)

[Read online](#)

#### **Strategy for Dealing with Safeguarding Vulnerable Groups Including Children Issues in Charities**

Charity Commission for England and Wales (accessed March 2019)

[Read online](#)

#### **Protecting All God's Children**

Church of England (accessed March 2019)

[Read online](#)

#### **Working Together to Safeguard Children**

HM Government (2023)

[Read online](#)

#### **Out-of-School Settings: Safeguarding Guidance for Providers**

Department for Education (2023)

[Read online](#)

### Useful links

**Types and indicators of harm that may affect adults:** [Ann Craft Trust](#)

**Types and indicators of harm that may affect children:** [NSPCC](#)

**Safeguarding advice for the voluntary sector:** [NCVO](#)

### Support for Survivors of Abuse

#### **[Safe Spaces](#)**

is a free and independent support service, providing a confidential, personal, and safe space for anyone who has been abused by someone in the Church or as a result of their relationship with the Church of England, the Catholic Church in England and Wales or the Church in Wales.

*Helpline:* 0300 303 1056

*Hours:* Monday–Friday 09:00–21:00, Saturday 09:00–13:00, Sunday 13:00–17:00

#### **[The Survivors Trust](#) - United Against Sexual Violence and Abuse**

The Survivors Trust is a national membership organisation supporting specialist rape and sexual abuse services in the voluntary sector. We have over 120 member organisations throughout the UK and Ireland who provide specialist support services to over 100,000 survivors each year.

*Helpline:* 0808 801 0818 | *Text:* 07860 022 956



*Helpline Hours:*

Monday – Thursday: 10am-12.30pm, 1.30pm-3pm & 6pm-8pm

Friday: 10am – 12.30pm & 1.30pm – 3pm

Saturday: 10am – 12.30pm

Sunday: 6pm – 8pm

Bank holidays: 10am – 12.30pm

**Replenished Life**

are an independent charity which supports those who have experienced abuse and trauma within faith.

**Support surrounding Domestic Violence**

**Phone Support**

**Respect Phoneline**

For those concerned they may be behaving abusively.

Phone: 0808 802 4040

**National Domestic Abuse Helpline (Women)**

Run by Refuge. Confidential, non-judgemental support.

Phone: 0808 2000 247 (24/7)

**Respect Men's Advice Line**

Support for men experiencing abuse.

Phone: 0808 8010 327 (Mon–Fri 10:00–20:00)

Webchat: Wed 10:00–11:30 & 14:00–16:00

**ManKind Initiative**

Support for male victims.

Phone: 01823 334 244 (Mon–Fri 10:00–16:00)

**Galop (LGBT+)**

Emotional and practical support.

Phone: 0800 999 5428

**App Support**

**Bright Sky** Confidential mobile app for anyone in an abusive relationship or concerned about someone they know. Free to download.

**Email Support**

**Women:** helpline@womensaid.org.uk (response within 5 working days)

**Men:** info@mensadviceline.org.uk (Mon–Fri 09:00–17:00)

**LGBT+:** help@galop.org.uk

**Further Information:** [NHS – Domestic Violence](#)

**In an emergency call 999. If you cannot speak,  
press 55, and the operator will track your location  
and deploy police response.**

**Forced**

**Marriage and So-Called 'Honour-based' Crimes:**



Forced marriage is a criminal offence in England and Wales and occurs where a person enters a marriage without full and free consent, including where violence, threats or coercion are used. Lack of consent may also arise where an individual is unable to consent. Schools and colleges have a key safeguarding role. Since February 2023, it has been a criminal offence to cause a child to marry before the age of 18, including non-binding or unofficial marriages, even where coercion is not used.

### **Forced Marriage Unit (FMU)**

Statutory guidance and professional advice.

Phone: 020 7008 0151 | Email: [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk)

Out of hours: 020 7008 5000

### **Karma Nirvana**

Support for forced marriage and honour crimes

Phone: 0800 5999 247 (Mon–Fri 09:00–17:00)

## **Female Genital Mutilation:**

### **NSPCC FGM Helpline**

contact anonymously if you're worried about someone at risk or a victim of FGM.

Phone: 0800 028 3550 | Email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

### **FORWARD UK**

Foundation of Women's Health Research and Development is the African women-led women's rights organisation working to end violence against women and girls.

### **NHS Specialist Clinics for FGM**

available in England.

## **Harmful Sexual Behaviours**

Harmful Sexual Behaviour (HSB) refers to sexual behaviours displayed by children and young people that are developmentally inappropriate, harmful or abusive, and may cause harm to themselves or others. Such behaviours can occur on a continuum and may be influenced by a range of factors, including age, development, experience and context. Children who display HSB are often vulnerable themselves and may require understanding, support and appropriate intervention.

### **Lucy Faithfull Foundation**

Provides a Harmful Sexual Behaviour (HSB) toolkit, offering guidance, advice and practical resources on prevention, alongside links to specialist organisations and helplines. Resources cover HSB in children, online safety, sexual development, and the prevention of child sexual abuse.

### **Shore Space (Lucy Faithfull Foundation and Home Office)**

An online preventative resource offering a confidential chat service for young people who are concerned about their own or others' sexual thoughts or behaviours.

### **Stop It Now!**

Provides guidance for parents, carers and professionals on preventing Harmful Sexual Behaviour in children, alongside a free and confidential helpline offering advice and support.

### **NSPCC**

Offers free, independent guidance and learning resources on Harmful Sexual Behaviour, including *Protecting Children from Harmful Sexual Behaviour* and the *Harmful Sexual Behaviour Framework*.





## Mental Health Need

**Immediate Risk of Harm:** Call 999

**Urgent Mental Health Support:** Call 111

### Other Support:

#### Your GP

Text 'SHOUT' to 85258 (24/7 text support) - [Shout](#)

#### Samaritans:

Phone: 116 123

Email: [jo@samaritans.org](mailto:jo@samaritans.org) please note, it can take several days to get an answer via email

Online peer support community [Side by Side](#)

### Suicide prevention support

#### **CALM (Campaign Against Living Miserably)**

Phone: 0800 58 58 58 (17:00–00:00)

Live chat and WhatsApp Option via [Website](#)

#### **PAPYRUS HOPELINE247**

Prevention of under-35 suicides in the UK

Phone: 0800 068 4141

HOPELINE241 chat via [Website](#)

#### **#StayAlive App**

UK suicide prevention resource for the UK, information and tools to help you stay safe.

### Mental health resources

**BEAT Eating Disorders Charity** – contact details can be found on the [website](#).

**Free CBT self-help** and therapy resources are available via <https://www.getselfhelp.co.uk/>

### App Support

**Self Heal** is a free app to help with the management of self-harm. It offers distraction techniques, advice, self-management techniques, mood boosters and links to other resources such as [|RCPSYCH.ac.uk](http://RCPSYCH.ac.uk). There is also a direct link to call the Samaritans from the app.

**Calm** is a mindfulness app especially designed for people suffering with stress anxiety, low self-esteem and poor sleep. The App offers meditation for a length of your choice. Some features include; music to help relaxation and sleep, masterclasses taught by experts, breathing exercises and daily life skills.

**Calm Harm** is an app that helps young people manage the urge to self-harm.

**What's up** is a free app that uses Cognitive Behavioural Therapy (CBT) and Acceptance Commitment Therapy (ACT) methods to help you cope with depression, anxiety, stress, and more. Use the positive and negative habit tracker to maintain your good habits, and break those that are counterproductive.



**Mind Shift** is one of the best mental health apps designed specifically for teens and young adults with anxiety. Rather than trying to avoid anxious feelings, Mind Shift stresses the importance of changing how you think about anxiety. Think of this app as the cheerleader in your pocket, encouraging you to take charge of your life, ride out intense emotions, and face challenging situations.

**SAM** might be perfect for you if you're interested in self-help, but meditation isn't your thing. Users are prompted to build their own 24-hour anxiety toolkit that allows you to track anxious thoughts and behaviour over time and learn 25 different self-help techniques. You can also use SAM's "Social Cloud" feature to confidentially connect with other users in an online community for additional support.

**Virtual Hope Box** contains simple tools to help with coping, relaxation, distraction, and positive thinking.

## **Bullying**

### **Helplines**

#### **ChildLine**

ChildLine is the UK's free, confidential helpline for children and young people.

Phone: 0800 1111 (24/7)

#### **EACH**

Helpline for children experiencing homophobic, biphobic or transphobic bullying or harassment.

Phone: 0808 1000 143 (Mon–Fri 09:00–17:00)

#### **Victim Support**

They offer support to young people affected by crime. Their Children and Young People's (CYP) Service also deals with cases of bullying; offering advice and working with professionals to ensure young people get the support they need.

Phone: 0808 1689 111.

### **Websites for support of victims of bullying**

#### **The Child Exploitation and Online Protection Centre (CEOP)**

maintains a website for children and young people, and parents and carers about staying safe online:

[CEOP Education](#).

#### **Childline**

Bullying specific [page](#). Building confidence after cyber bullying [video](#).

#### **Kidscape**

information for young people.

#### **National Bullying Helpline**

provide information and advice for anyone dealing with bullying.

#### **Direct Gov**

Information for young people on cyberbullying, bullying on social networks, Internet and email bullying, bullying on mobile phones, bullying at school, what to do about bullying, and information and advice for people who are bullying others and want to stop.



## Reporting cyberbullying

If someone makes you feel uncomfortable or upset online, talk to an adult you can trust, such as a relative or a teacher. If you would prefer to talk to someone in confidence you can contact [Childline](#).  
*Phone: 0800 1111*

If someone has acted inappropriately online towards you, or someone you know, you can report directly to the [Child Exploitation and Online Protection Centre](#) (CEOP). It could be sexual, or threatening chat, or being asked to do something that makes you feel uncomfortable or someone asking to meet up.



## Appendix G – Staff Code of Conduct

### 1. Purpose of this code

As a Christian organisation that seeks to put the gospel at the heart of its work, CPAS believes that every individual is uniquely created by God and made in his image and likeness. As a result, CPAS is committed to creating a well-run, safe, constructive working environment in which all are treated with dignity and respect, and everyone is kept safe.

This code does not form part of any employee's contract of employment.  
CPAS may, at its discretion, amend this code at any time.

### 2. Roles and responsibilities

At CPAS

- senior managers have overall responsibility for the content of this code
- employees are responsible for following this code
- the Director of Operations and Finance is responsible for reviewing this code once a year.

### 3. Our values

CPAS' four values are:

- Missionally Focused
- Graciously Engaged
- Boldly Innovative
- Courageously Hopeful

The way we aspire to live these out are set out below and expanded in detail in the Code of Conduct.

#### **Missionally Focused**

The founders of CPAS were inspired to 'take the gospel to everyone's door with a single eye to the glory of God.' We continue to serve the mission of Jesus in our fast-changing culture through a focus on equipping local churches and Christian residential for contemporary mission.

#### **Graciously Engaged**

As an Anglican evangelical mission agency, we are committed to the historic Christian faith, revealed in Scripture and centred on the life-transforming gospel of Jesus Christ. We aim to use our opportunities for influence to foster this faith entrusted to the church and work graciously with all.

#### **Boldly Innovative**

CPAS has a track record of creating high-quality resources to support effective Christian leadership in local churches and on Christian residential. We want to be agile in creating well-timed and innovative contributions which address the needs and opportunities which will face the church of the near future.

#### **Courageously Hopeful**

Because the same Spirit that raised Jesus from the dead is at work in the church today, we respond to challenges with honesty and with a confidence that is founded in our resurrection faith. We aim to be a non-anxious presence, enabling Christian leaders who encounter us to face their pressures with renewed hope and courage.

### 4. Employee personal conduct

CPAS expects that at all times, employees will:



## **Prioritise the safety and well-being of all people that we interact with in our work**

- Treating others with dignity and respect, giving priority to others' interests, rights, safety and welfare.
- Promoting relationships that are based on openness, honesty, trust and respect.
- Committing to humility and compassion, being supportive, forgiving, tolerant and servant hearted.
- Seeking to resolve personal conflict as far as possible and as long as it is safe to do so.
- Encouraging a generous culture of giving to each other of our time and expertise.
- Recognising the sacrificial generosity of our volunteers, donors and supporters which enables CPAS' work.
- Holding children and young people and their safeguarding at the heart of our work.
- Valuing and welcoming contributions from everyone about how we can work better and differently.
- Prioritising well-being and being attentive to the risks of burnout.
- Avoiding using any behaviour that could be perceived as threatening or abusive in any way. This includes bullying, emotional abuse, harassment, physical abuse, spiritual abuse or sexual abuse (including inappropriate physical contact and inappropriate language or gestures). This also includes shouting, swearing and personal insults, or committing violent physical acts including door-slamming or throwing objects.
- Avoiding using any behaviour that is, or could be misinterpreted as, inappropriate. This includes, but is not limited to, behaviour that may lead to an inappropriate intimate relationship (emotional, physical or sexual) developing between, for instance, a senior and a junior colleague<sup>7</sup>.
- Being prepared to challenge unacceptable behaviour or to be challenged, and to report any breaches of this Code of Conduct or any concerns without delay.
- Informing the CEO or Safeguarding Manager immediately if you become the subject of a criminal investigation, a social services investigation, a church or diocesan safeguarding investigation, or a church disciplinary process (e.g. CDM or similar).

## **Build trust through consistent and ethical behaviour**

- Undertaking duties with all reasonable care and skill, in a responsible, safe and competent manner. Aspiring to excellence and quality in our work.
- Promoting and protecting the mission and aims of CPAS - acting with integrity, being truthful and trustworthy, reliable and dependable, avoiding any situations that would bring CPAS into disrepute.
- Communicating in an open, honest and respectful manner, learning how to listen well before speaking, and avoiding secretive communications or hidden agendas.
- Ensuring a respectful use of social media, complying with relevant policies or guidance.
- Taking responsibility for our own actions and decisions, acknowledging mistakes, making changes where needed, and making ourselves answerable to others.
- Declaring any personal interest which may conflict with the ability to fulfil duties fairly and impartially or which may be seen by others as such.
- Stewarding our resources well, being responsible in our use of CPAS' property, funds and assets.

## **Commit to confidentiality, compliance and the secure handling of information**

- Acting professionally and adhering to expectations of confidentiality in all situations and interactions within and outside of CPAS.
- Respecting everyone's right to personal privacy and ensuring that any personal information is kept secure and not disclosed, in accordance with our Data Protection Policy.

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<sup>7</sup> CPAS recognises that some employees may enter into appropriate consensual personal relationships at work, and if so, are asked to inform their line manager or HR.



- Complying with CPAS' Safeguarding policy and all other safeguarding processes and procedures related to your role, in all situations, reporting all disclosures, concerns, allegations, and suspicions to the person immediately responsible as outlined in the Safeguarding policy.
- Adhering to Health and Safety standards, ensuring any equipment is used safely and for its intended purpose, taking care not to damage property belonging to CPAS or others.
- Reporting any allegations or suspicions of financial abuse or fraud.
- Undertaking any necessary training and complying with all CPAS policies and procedures.
- Always ensuring our own compliance with this Code of Conduct.

In addition to the rules set out above, we expect that employees will follow all CPAS policies, which can be found on Breathe HR.

## **5. Breaching the Code of Conduct**

If employees breach this Code of Conduct, action may be taken under the Disciplinary Procedure or Capability Procedure (whichever is most appropriate).

## **6. Reporting breaches of this code**

If you consider that a colleague, trustee, volunteer, or freelancer of CPAS has breached this code, you should report it without delay:

- For trustees, report to the CEO
- For staff, report to their line manager
- For volunteers, report to their Team leader
- For freelancers report to the responsible Manager

If you consider that a breach of this code merits a disclosure under whistleblowing legislation, you should follow our Whistleblowing policy, which can be found on Breathe HR.



## Appendix H – Low-Level Concerns Policy

### Safeguarding Commitment and Culture

This policy reflects CPAS's safeguarding vision that every person has inherent value and must be protected from harm. Safeguarding is integral to our mission, ministries and leadership, and is strengthened through openness, accountability and learning.

Raising a low-level concern is a neutral and responsible act, in line with guidance from Farrer & Co, Thirtyone:eight and the NSPCC. It is not an accusation, but a safeguarding measure that supports safe cultures, protects children and adults at risk, and safeguards those serving in ministry and leadership roles.

### Scope and Applicability

This policy applies to all staff, trustees, volunteers, and those acting on behalf of the charity. It applies across all contexts, including Venture and Falcon holidays, leadership training and residentials, mentoring and pastoral relationships, Patronage appointments, and any activity involving children or adults at risk of harm.

### What is a Low-Level Concern?

Low-level concerns relate to behaviour that falls short of the expectations set out in the Code of Conduct as outlined in the CPAS Safeguarding Policy (Appendix H).

A low-level concern is any concern that an adult's behaviour:

- is inconsistent with expected professional, pastoral or safeguarding standards; and
- does not meet the threshold for a formal safeguarding allegation, disciplinary action or statutory referral.

The term low-level does not mean insignificant. Such concerns may indicate emerging risk, boundary drift or patterns of behaviour that require early intervention.

These differ from a **safeguarding allegation**, which is where information suggests an adult may have:

- harmed a child or adult at risk of harm;
- committed a criminal offence;
- behaved in a way that indicates they may pose a risk of harm; or
- behaved in a way that suggests they may be unsuitable to work with children or adults at risk of harm.

### Proactive Awareness and Diligent Inquiry

All staff, trustees, volunteers, and those acting on behalf of the charity are expected to exercise proactive awareness and diligent inquiry when interacting with children, young people, or adults at risk. This includes being attentive not only to what is explicitly said but also to what may be implied, hinted at, or left unsaid. Ambiguous statements, subtle cues, or changes in behaviour may indicate discomfort, risk, or emerging concerns. By exploring these signals sensitively and asking appropriate clarifying questions, staff help ensure that emerging safeguarding concerns are not overlooked. Recognising such early indicators supports timely intervention and contributes to the creation of a safe culture, in line with CPAS' safeguarding vision, Low-Level Concerns Policy principles, and Code of Conduct expectations.

### Behavioural Standards and Code of Conduct

This policy operates in direct relationship with the Code of Conduct, which sets expected standards relating to:





- professional and pastoral boundaries;
- respectful engagement, including language, tone and physical proximity;
- confidentiality and information sharing, recognising that safeguarding overrides pastoral confidentiality;
- appropriate use of authority, influence or spiritual power;
- communication, including digital platforms;
- conduct in residential settings.

Any behaviour inconsistent with these expectations, even if isolated, unintentional or well-meant, may constitute a low-level concern and should be reported.

### **Reporting a Low-Level Concern**

All staff, volunteers, trustees and partners are encouraged to share low-level concerns promptly and without fear of reprisal.

Concerns should be reported to:

- the Residential Safeguarding Officer (who will inform the CPAS Safeguarding Team); or
- the CPAS Safeguarding Manager or Deputy Safeguarding Manager; or
- where the concern relates to a member of the Safeguarding Team, the Safeguarding Trustee Lead or nominated senior leader, in line with the Safeguarding Escalation Pathway.

Concerns should ideally be reported within 24 hours, and no later than one week. Historic low-level concerns may still be reported, particularly where safeguarding training or reflection prompts a concern not previously recognised.

### **Record Keeping and Information Management**

Low-level concerns will be recorded in the organisation's central safeguarding system (including, but not limited to, CPOMS) and managed in line with CPAS's approach to secure and confidential information handling. These records are consulted as part of safer recruitment for voluntary roles to identify any transferable risk.

Low-level concerns are not normally placed on employee personnel files unless escalation occurs.

### **Review, Response and Escalation**

The Safeguarding Team will consider concerns in context and determine proportionate next steps. Responses may include:

- reflective or supportive conversations;
- clarification of expectations and boundaries;
- additional training or supervision;
- monitoring or review;
- escalation into formal safeguarding or disciplinary procedures.

Where patterns of behaviour emerge, concerns will be escalated in line with the Safeguarding Policy.

### **Training and Awareness**

All staff and residential volunteers receive safeguarding training that includes awareness of low-level concerns, reporting expectations and this policy.

Note: This policy is part of the wider Safeguarding Policy and should be read alongside it, as well as the organisation's Code of Conduct and Whistleblowing Policy.

