

Appendix C -
Parish Vulnerable Adults
Guidance

Holy Cross Bearsted

Safeguarding Children and
Vulnerable Adults from
Harm Policy

July 2021

Contents

1	Bearsted Parish supporting vulnerable adults	2
2	Appointments of paid/volunteer leaders supporting vulnerable adults	2
3	Abuse and Neglect of adults	2
4	Definition	3
5	Factors that increase vulnerability	3
6	Who abuses vulnerable adults	4
7	Coercive Control	6
8	Modern slavery (Human Trafficking)	6
9	Spiritual Abuse in respect of children and adults	7
10	Deliverance Ministry Best Practice	7
11	Working in the community with vulnerable adults	8
12	Visiting vulnerable adults	8
13	Lone working	10
14	Preventing financial abuse and safeguarding the integrity of the worker	11
15	Safe environment for adults	11
16	Guidelines for responding to person disclosing abuse	14
17	What to do if you have concerns about an adult or church officer	15
18	Responding Promptly to Every Safeguarding Concern or Allegation – Quick Guide 17	
19	Particular issues concerning vulnerable adults	18
20	Recording, data protection and information sharing	19
21	Whistle blowing	20
22	Useful telephone numbers	21

1. Bearsted Parish supporting vulnerable adults

- 1.1. This document forms part of the Parish Safeguarding Policy and is issued for the guidance of appointed persons representing Holy Cross, Bearsted in supporting Vulnerable Adults within the Parish Community.
- 1.2 The information is drawn from the House of Bishops (HOB) Parish Safeguarding Handbook – Promoting a Safer Church 2018-2019 together with current training notes and guidance available from the Diocesan Safeguarding Website.
- 1.3 This document will be reviewed annually and presented to the Incumbent and PCC for adoption, to ensure that information and administrative details are relevant and up-to-date.

2 Appointment of paid/volunteer leaders supporting vulnerable adults

- 2.1 The “Safeguarding Policy” of the Church of England, together with Diocesan guidelines will be followed regarding appointments to any role involving “working with vulnerable adults,” to ensure safer recruitment principles.
- 2.2 There should be appropriate interview procedures depending on the level of responsibility and time commitment involved. A paid worker would therefore be subject to the more formal procedure identified in paragraph 6.1 of the Parish Policy document, in consultation with the Diocesan Safeguarding Adviser (DSA).
- 2.3 Volunteer workers can be interviewed within the Parish, without the early consultation with the DSA, as detailed in paragraphs 6.2 and 6.3 of the Parish Policy document.
- 2.4 There should be appropriate job descriptions and personal specifications for each role. Appendix A of the Parish Policy details the recruitment guidance and documentation required.
- 2.5 All paid and volunteer workers should comply with the appointment procedure of the Parish Policy and Diocesan guidelines. This may include the completion of a Confidential Declaration, the taking up of references for all over 16 years of age and completing the appropriate Disclosure and Barring Service (DBS) procedures.
- 2.6 All paid and volunteer workers should be fully aware of the Parish Safeguarding Policy and the published guidance, both national and within the Diocese, at the time of appointment, seeking any appropriate training relevant to role.

3 Abuse and Neglect of Adults

- 3.1 All adults, including vulnerable adults, have a fundamental human right to choose how and with whom they live, even if to outsiders this appears to involve a degree of risk. They should be supported to make those choices, to live as independently as possible. The only occasion when that right should be superseded is in situations where other people are put at risk or where the adult is mentally incapacitated and decisions need to be taken on the basis of their best interests.

- 3.2 All vulnerable adults should be treated with respect and dignity. Their privacy should be respected. They should be allowed to lead as independent a life as possible. They are entitled to the full protection of the law as much as anyone else.
(Type of Abuse Fact Sheet is available at www.churchofengland.org/safeguarding).

4 Definition:

- 4.1 The term ‘vulnerable adult’ refers to a person aged 18 or over whose ability to protect themselves from violence, abuse, neglect or exploitation is significantly impaired through physical or mental disability, illness, old age, emotional fragility, distress, or otherwise; and for that purpose, the reference to being impaired is to being temporarily or indefinitely impaired.

5 Factors that increase vulnerability

- 5.1 Some adults may not consider themselves vulnerable but may be vulnerable to being abused by individuals in positions of leadership and responsibility. As adults are not inherently vulnerable and in need of protection it is important to recognise that the factors described at 5.2 below do not, of themselves, mean that a person is vulnerable. It is a combination of these factors and the circumstances that a person finds him/herself in that can make an individual vulnerable to abuse or neglect.

- 5.2 What makes an adult potentially vulnerable? :

- A mental illness, chronic or acute
- A sensory or physical disability or impairment
- A learning disability
- A physical illness
- Dementia
- An addiction to alcohol or drugs
- Failing faculties of old age
- Being unemployed, homeless, in hospital, in prison
- Poverty
- Victim of assault, harassment, bullying
- Victim of human trafficking, sexual exploitation, modern slavery
- Victims/survivors of domestic abuse – direct violence and/or significant emotional coercion
- Those who have suffered historic abuse in childhood
- A permanent or temporary reduction in physical, mental or emotional capacity brought about by life events – e.g. bereavement or abuse or trauma
- Being of racial or ethnic minority, a stranger, refugee, asylum seeker
- Relationship with someone in a position of trust

- 5.3 These factors may not exist in isolation; for example, someone with a drink problem masking underlying dementia; or a frail housebound elderly person with underlying depression.

6 Who abuses vulnerable adults?

6.1 Potentially *anyone*, adult or child, can be the abuser of an adult. Abuse will sometimes be deliberate but it may also be an unintended consequence of ignorance or lack of awareness. Alternatively it may arise from frustration or lack of support. The list can include:

- Relatives of the vulnerable person including husband, wife, partner, son or daughter. It will sometimes include a relative who is a main carer.
- Neighbours.
- Paid carers.
- Workers in places of worship.
- People who are themselves vulnerable and/or are users of a care service.
- Confidence tricksters who prey on people in their own homes or elsewhere.

6.2 **Relatives who are Main Carers** – Carers can experience considerable stress, exhaustion and frustration without respite or support. This can lead to unintended poor care or abuse. Relatives who are the main carers may also be subject to abuse by those they are caring for. Such abuse is often endured for long periods and unreported. (Further information available from the Carers Trust).

6.3 **Institutions** – All people living in institutions are more likely to have a degree of vulnerability. The Care Quality Commission (CQC) in England has responsibility for inspecting and regulating the quality of care institutions such as residential care homes, domiciliary care services and hospitals. The Parliamentary and Health Ombudsman (PHSO), deals with complaints that relate to the NHS, including GP services. In addition, the Local Government and Social Care Ombudsman deals with complaints that relate to adult social care. HM Inspectorate of Prisons (the Prison and Probation Ombudsman) in England inspects prisons. Some members of the parish may be visiting adults in institutions – hospitals, prisons and residential homes. If as part of their church responsibilities, they have concerns about the care being given and/or the way that someone is being treated the DSA should be contacted. Referral can also be made directly to the institution or raise concerns with the appropriate inspection and/or complaints body.

6.4 **Definitions of Adult Abuse** – The UK central government document ‘Care and Support Statutory Guidance’ categorises and defines adult abuse in terms of:

- **Physical abuse** including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

- **Sexual abuse** – including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.
- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- **Financial or material abuse** – including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Neglect or acts of omission** – including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Discriminatory abuse** – including racist, sexist, that based on a person’s disability, and other forms of harassment, slurs or similar treatment.

To these should be added:

- **Survivors** - of abuse perpetuated in childhood or adulthood who may need specific pastoral care.
- **Domestic abuse** - that is usually a systematic, repeated and often escalating pattern of behaviour by which the abuser seeks to control, limit and humiliate, often behind closed doors.

The HOB policy states that *‘The Church is committed to those who have been victims and survivors of domestic abuse. Domestic abuse in all its forms is contrary to the will of God and an affront to human dignity. All need to play their part in preventing or halting it.’* The welfare of the adult victim of domestic abuse is important, but where there are children in the family it must be understood that they too are victims of domestic abuse. Consideration of the child’s welfare always comes first. In all circumstances, contact the DSA who will help clarify the issues and steps needed, which may involve contacting Children’s

Social Care. There may be a need for a risk assessment and for a Safeguarding Agreement to be put in place. The DSA will undertake this work in conjunction with the parish church and any statutory agencies.

Holy Cross, Bearsted, acknowledges that domestic abuse situations receive the same attention as safeguarding issues and have included the subject within the parish safeguarding policy (part 9 of the Safeguarding Policy document).

The HOB 'Parish Safeguarding Handbook' 2018-2019 recommends as good practice to:

- Encourage leaders and those who preach to speak against domestic abuse in teaching, sermons, prayers and parish magazines – remember that many of the congregation may have personal experience of domestic abuse.
- Offer some awareness-raising activities e.g. invite speakers from local domestic abuse agencies.
- Consider including activities around healthy relationships within activities for children and young people.
- Develop links with local domestic abuse organisations.
- Organise courses in parenting and confidence-building.
(see also section 19 below)

7 Coercive Control

7.1 Coercive control is recognised as part of a domestic abuse pattern but also has its own definition in UK law. Coercive control is when a person with whom you are personally connected, repeatedly behaves in a way which makes you feel controlled, dependent, isolated or scared.

7,2 If you suspect that you or someone you know is experiencing coercive control contact the DSA immediately for advice or the person themselves can contact the police directly.

(Diocesan Supplementary Safeguarding Booklet 2019)

8 Modern slavery (Human Trafficking)

8.1 The number of people trafficked for sexual exploitation, domestic servitude, 'sweat-shop labour', or other exploitation has risen sharply in the UK. Violence, intimidation and restriction of liberty often go hand in hand. Detailed guidelines on the recognition of human trafficking are available on the Safeguarding section of the Diocesan Website.

8.2 If you think someone you know is involved in or is the victim of human trafficking contact the DSA immediately.

(Diocesan Supplementary Safeguarding Booklet 2019)

9 Spiritual Abuse in respect of children and adults

- 9.1 Work is being undertaken by the National Safeguarding Steering Group (a sub-group of the HOB) to establish a clear policy on this area of abuse. In the interim the Diocese has adopted the definition of spiritual abuse as set out by Dr Lisa Oakley who is working with the National Safeguarding Team on this policy and foremost expert in this area of work.
- 9.2 Spiritual abuse is *'a form of emotional and psychological abuse. It is characterised by a systematic pattern of coercive and controlling behaviour in a religious context. Spiritual abuse can have a deeply damaging impact on those who experience it. This abuse may include: manipulation and exploitation, enforced accountability, censorship of decision making, requirements for secrecy and silence, coercion to conform, control through the use of scriptures or teaching, requirement of obedience to the abuse, the suggestion that the abuse has a 'divine' position, isolation as a means of punishment, and superiority and elitism.'*
- 9.3 If you think someone you know is or has experienced spiritual abuse contact the DSA.

(Diocesan Supplementary Safeguarding Booklet 2019)

10 Deliverance Ministry Best Practice

- 10.1 Clergy may well encounter situations or individuals where evil or oppression is thought to be at work. The Church has much to offer through Christ's healing ministry including pastoral care and counselling. The Diocese has a team of deliverance ministry advisors who are available to provide advice to parishes and minister to those concerned. Particular caution must be exercised where children or vulnerable adults are in the household. If an enquiry about deliverance ministry involves a child or vulnerable adult then the Bishop's Adviser must be consulted. Further information on the deliverance ministry team, what they can offer and the referral process is available on the Safeguarding section of the Diocesan Website, together with a flow chart for deliverance ministry referrals.

(Diocesan Supplementary Safeguarding Booklet 2019)

11 Working in the community with vulnerable adults

11.1 **Street work** – Places of worship and organisations work often with those who live and work on the street or provide soup and support to homeless people or contact with sex workers (prostitutes). Safety at work is the responsibility of both employers and employees and the Suzie Lamplugh Trust has published a guide for people involved in this kind of work. Listed below are guidelines for the safety of all those working on the street.

- Ensure that your organisation liaises with relevant agencies including statutory agencies informing them of the work you are doing.
- **Never** give money. It could be used for the purchase of drugs/alcohol and in the case of sex workers may be construed as payment for illegal activity leading to a criminal prosecution.
- Be aware of the geography where you are working e.g. is it known as a drug dealing or high crime area, are there isolated areas?
- **Avoid** wearing jewellery, taking handbags and any other unnecessary accoutrements. Keep wallets and purses in secure pockets.
- Be sure any vehicle you are using has sufficient fuel and is in good working order.
- For workers' personal safety, ensure that the leadership is aware where you are. Have a mobile phone and agree a time to "clock-off" either by returning to the place of worship or by a phone call to a designated person.
- **Do not** show people your mobile phone and never divulge personal details (address etc.). If you have to give a contact number then give the number for the place of worship.
- Work in pairs where possible.

11.2 Have a risk assessment policy covering:

- The threat or actual physical abuse.
- Psychological consequences of an interaction (e.g. actual or threatened violence).
- Being in a compromising situation, in which there might be accusations of improper behaviour.
- Health and safety issues such as infectious illness and accidents.

12 Visiting vulnerable adults

12.1 Visiting vulnerable adults in their homes is an essential element of many church officers' roles. Many parishioners will be well known to the church officer and where

there have been no previous concerns, the level of risk to the church officer or parishioner during visits will usually be low. However, unexpected circumstances

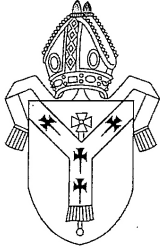
can be encountered, some of which may place a church officer at risk (e.g. the unexpected presence in the home of a relative or friend with a history of violence or threatening behaviour). Unfortunately, case histories also show that a parishioner may be at risk from a church officer. For these reasons it is very important for parishes to ensure their church officers and parishioners are as safe as they can be, and that there is accountability and transparency in the manner in which church officers engage in lone working or visits to homes.

12.2 To assure the person you are visiting of their safety, and for your own as a church officer:

- If possible undertake a risk assessment* before an initial visit, especially if you do not know the person. If there are any concerns or risks known before a visit is made, you are advised always to undertake a risk assessment. In these circumstances, consider whether the visit is necessary, or whether you should be accompanied by another church officer. In addition, visiting in pairs may be advisable, especially if the adult is perceived to be vulnerable.
- **Do not** call unannounced; call by appointment, if appropriate telephoning the person just before visiting.
- Be clear about what support you can offer and the purpose and limitations of any pastoral care/support that is available.
- **Do not** make referrals to any agency that could provide help without the adult's permission, and ideally encourage them to set up the contact, unless there are safeguarding concerns.
- **Never** offer 'over-the-counter' remedies to people on visits or administer prescribed medicines, even if asked to do so.
- **Do not** accept any gifts from adults other than token items, to avoid misunderstandings or subsequent accusations from the person or their family. If someone wants to make a donation to the church, put it in an envelope, mark it on the outside as a donation and obtain a receipt from the Treasurer (see 14.3 below).
- Make a note of the date when you visit people, report back about the visit to the agreed named person and say what is concerning or going well. They will report safeguarding concerns to the PSO and/or incumbent or directly to the DSA if they are not available.

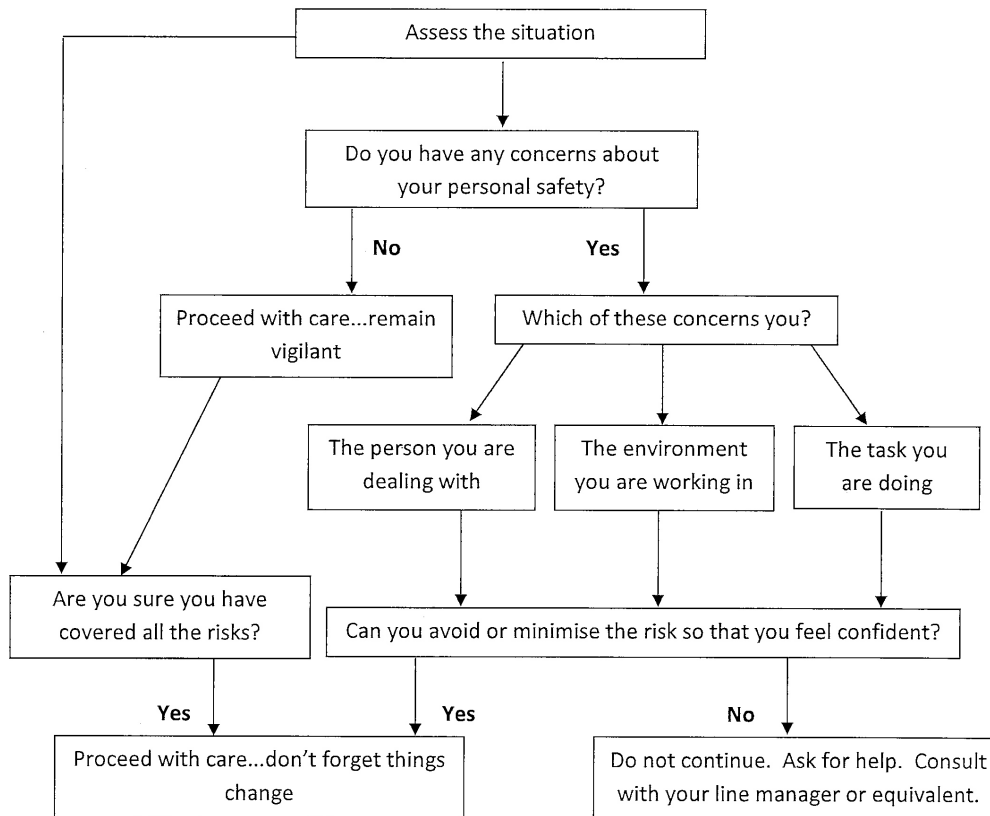
(*Risk assessment form available at www.churchofengland.org/safeguarding)

13 Lone working



Safeguarding personal risk assessment

Use this to assess your environment, and your working practices, as well as for an instant assessment of a situation.



From Personal Safety at Work, Suzy Lamplugh Trust 2006, revised 2008

14 Preventing financial abuse and safeguarding the integrity of the worker

- 14.1 People who work with vulnerable adults in the community can become involved in aspects of their personal finance. For example, they may be asked to collect their pension or benefits or do shopping or banking transactions on their behalf. When conducting a home visit, money may be lying around. It is therefore important to consider how to protect both the vulnerable adult and the worker from accusations of financial mismanagement or dishonesty.
- 14.2 Assistance with a person's cash, bills or shopping, because of their age, illness or disability, by a church worker, is identified in legislation as being a "Regulated Activity", even if it was a one off event. The appropriate level of authorisation through the DBS must be in place as protection for the worker against potential criminal prosecution.
- 14.3 Safer working practices include:
- Ensure that receipts are always given for purchases.
 - Don't move any money which may be left around (e.g. when cleaning).
 - Ideally two people should be involved when handling money.
 - Occasionally people may offer gifts including monetary gifts to those who help or care for them. We would advise that these gifts should be declined if at all possible. Where this is not possible without causing offence, all gifts and offers of gifts should be reported to the leader of the group and recorded. If specific guidelines are already in place these must obviously be followed (see also 12.2 above).

15 Safe environment for adults

- 15.1 **Attitudes** – Places of worship and relevant activities should be welcoming and accessible to vulnerable adults. An adult with a disability is not necessarily vulnerable, nor is a vulnerable adult necessarily disabled. However, discrimination faced by disabled people is not uncommon. It is essential therefore that every effort is made to create an environment that is inclusive and accessible and where vulnerable adults are free from fear of being exploited, marginalised or abused.

15.2 Good practice regarding visual impairment

- Identify yourself by name;
- Reserve seats near the front so the partially sighted person has the option to sit closer to what is going on. Offer to assist someone who is blind to find their way around. Don't push; always allow them to take your arm and if necessary provide space for a guide dog to lie down;
- Make sure that all corridors, approaches and circulating areas are free from obstructions;
- Ensure large print versions are available for songs/hymns and other written material (e.g. Bible, news sheets etc.). Print for partially sighted individuals should be in a Sans Serif typeface (e.g. Arial).
- Good lighting is required for partially sighted people;
- The international symbol for visual impairment can be shown on literature and notice boards to indicate what facilities are provided for blind and partially sighted people.

15.3 Good practice regarding hearing impairment includes:

- Get the attention of a deaf person before speaking to them;
- Address the deaf person directly, not the person who may have accompanied them;
- Be aware that they may not be able to speak if they have been deaf from birth;
- Ensure that your face and mouth can be seen clearly. Look directly at the person and speak at normal speed and volume with clear lip patterns. Avoid exaggerated lip patterns that are harder to read. Keep your hands away from your face and remember eating or chewing gum whilst talking hinders effective lip reading. Don't speak directly into the person's ear;
- A hearing induction loop should be provided whether you are aware of people using hearing aids or not. It is not always obvious someone has a hearing aid and most people do not like to draw attention to the fact;
- Where someone is asked to sign what is said and sung they need to be in a clear visible well-lit place;
- Be aware that background noise can make life very difficult for individuals who use a hearing aid because it often distorts sounds they are trying to hear;
- Be prepared to write things down if necessary; the important thing is not to give up if communication is difficult. Change/simplify your language if the deaf person does not understand, avoiding jargon;
- The international symbol can be shown on literature or notice boards to indicate that facilities are available for the deaf or hard of hearing.

15.4 Good practice regarding impaired mobility includes:

- Internal or external access needs to be level or ramped;
- Don't designate one area for wheelchair users; this unnecessarily draws attention to their disability;
- Think about a seat being reserved alongside a wheelchair user so that a friend can sit next to them;
- When talking to a wheelchair user it is polite to sit down so that you are on the same level, making eye contact easier;
- Remember that a wheelchair is part of the user's personal space – so don't lean on it, hold it or attempt to move it/push it unless asked. However, offers are usually welcome, even if declined;

- The international symbol can be shown on literature, notice boards and facilities such as toilets to indicate that there is access for those with impaired mobility.

15.5.1 **Good practice regarding learning disability includes:**

- Adults with learning disabilities may well have limited or no reading ability so where possible signpost facilities and directions (fire exits, toilets etc.) using images as well as words;
- Offer assistance if people seem to be experiencing difficulties understanding or if they require help with certain instructions;
- Speak in short sentences;
- Check out they have understood. Beware of “veneer skills” where someone gives the impression of understanding when they do not;
- Give them time to process questions and answers;
- Avoid completing sentences for them;
- It can sometimes be helpful to check out how best to communicate with the person with someone who knows them well;
- Be patient if individuals are noisy or move about when it seems inappropriate; don’t immediately pick up on the norms of how things are usually done within your place of worship.

15.5.2 Those with a learning disability should be embraced into church life and church activities. However difficulties can emerge when an adult with a learning disability is given responsibilities in a children’s group. Thought needs to be given over whose needs this will be serving. Attention needs to be given to: supervision arrangements; the age and vulnerability of the children in the group; how well boundaried the adult is able to be; and whether they have the intellectual ability to pick up on the cues presented by the children. If in any doubt the advice of the DSA should be sought.

15.6 **Good Practice for those working with people with dementia**

- Those with dementia have varying skills dependent on where they are on the wide spectrum of dementia. It is important to find out what those skills are, so get to know them and consult with them and their carer.
- Those with dementia require stability, attention, calm ordered routines, familiar faces and a familiar home environment. These can make a huge difference to their contentment and wellbeing.
- Some of the good practice points on communication at 15.5.1 above can assist in speaking to those with dementia such as: speaking in short sentences; checking out that what is said is understood; and giving time for people to process and answer questions.

Training for parishes on dementia is available through the Diocese, via the Diocesan Safeguarding Administrator or the Safeguarding Office at Diocesan House. Alternatively, training can be booked online on the Safeguarding section of the Diocesan Website.

16 **Guidelines for responding to a person disclosing abuse**

16.1 When a vulnerable adult discloses or alleges abuse it is important to “actively and empathically listen” to what the person is saying but not to start asking leading questions since this might put ideas into that person’s mind that were not there before and might prejudice a formal investigation should that be necessary. Never attempt to undertake an investigation yourself or speak directly to the person against whom allegations have been made. (See Do’s and Don’ts at 16.4.1 & 16.4.2 below).

16.2 It is important to tell the individual that you will need to pass on the information to someone else. Never promise confidentiality. Let the person know what you are going to do next and obtain their consent (where appropriate) before taking action. (see also section 17 below)

16.3 It is critical to make a written note of the conversation including:

- What the person said, if possible including their exact words over critical points. Make some very brief notes at the time, if appropriate, and write them up in detail as soon as possible.
- **Do not** destroy your original notes in case they are required by the DSA or the statutory authorities.
- Record the date, time, place length of interview and actual words used, including any swear words or slang.
- Record the facts and observable things, i.e. the physical and emotional appearance of the person, not your interpretations or assumptions.
- Don’t speculate or jump to conclusions.
- Sign the note.

16.4 Diocesan Safeguarding advice confirms that when a vulnerable adult makes a disclosure or allegation of abuse to a person they trust within the church or elsewhere, it is important not to discourage them from doing so.

16.4.1 **Do:**

- Actively listen.
- Take what is said seriously.
- Only use open questions (open questions begin with words like: who, what, when and how. Open questions cannot be answered with a ‘yes’ or ‘no’).
- Remain calm.
- Take into account the person’s age and level of understanding.

- Check, if face to face, whether they mind you taking notes while they talk so you can make sure you capture the information accurately. At the end you can check with them that you have understood everything correctly.
- Offer reassurance that disclosing is the right thing to do.
- Establish only as much information as is needed to be able to tell your activity leader/PSO/ DSA and statutory authorities what is believed to have happened, when and where.
- Check what the person hopes to happen as a result of the disclosure.
- Tell the adult what you are going to do next.

2. Do not:

- Make promises that cannot be kept (e.g. that you won't share the information).
- Make assumptions or offer alternative explanations.
- Investigate.
- Contact the person about whom allegations have been made
- Do a physical or medical examination.

16.5 Report:

- If there is immediate danger to a child or adult contact the police.
- Otherwise report to your activity leader/PSO/incumbent immediately.
- Within 24 hours the PSO/incumbent reports the concerns to the DSA.
- The DSA will advise regarding reporting to statutory agencies within 24 hours.
- If there is any doubt seek advice from Children's/Adult's Social Care or the police.

16.6 Non-recent abuse.

Safeguarding concerns or allegations may be about something that is going on now and/or something that may happen in the future (recent) or something that happened in the past (non-recent). Non-recent allegations of abuse must be treated as seriously as recent allegations. Research evidences that it may take up to 25 years or longer for an adult to disclose sexual behaviour that happened to him/her either as a child or younger adult. A victim/survivor needs to be aware that if a respondent is known to be currently working with children/vulnerable adults in either a paid or voluntary capacity a referral to the statutory services will be made. The DSA will make this referral.

17 What to do if you have concerns about an adult or church officer

- 17.1 If you have a concern that an adult is or may be being abused, or that a church officer (i.e. anyone appointed/elected by/on behalf of the Church to a post/role, whether ordained/lay, paid/unpaid, e.g. priest, churchwarden, bell-ringer, organist or youth activity leader) is or may be abusing a vulnerable adult through behaviour that is not in line with safer working practices, respond well to the victim/survivor, if it is a direct disclosure, to ensure they feel listened to and taken seriously. Explain what will happen next and check out support requirements. They should be informed that their identity and the identity of the person about whom a safeguarding concern/allegation has been made will be shared with key church officers (e.g. normally the PSO, incumbent, archdeacon and DSA. It may also be an activity leader if the concern arose within an activity) and may be shared with the statutory

agencies. The concern or allegation should not be shared with anyone other than those who need to know.

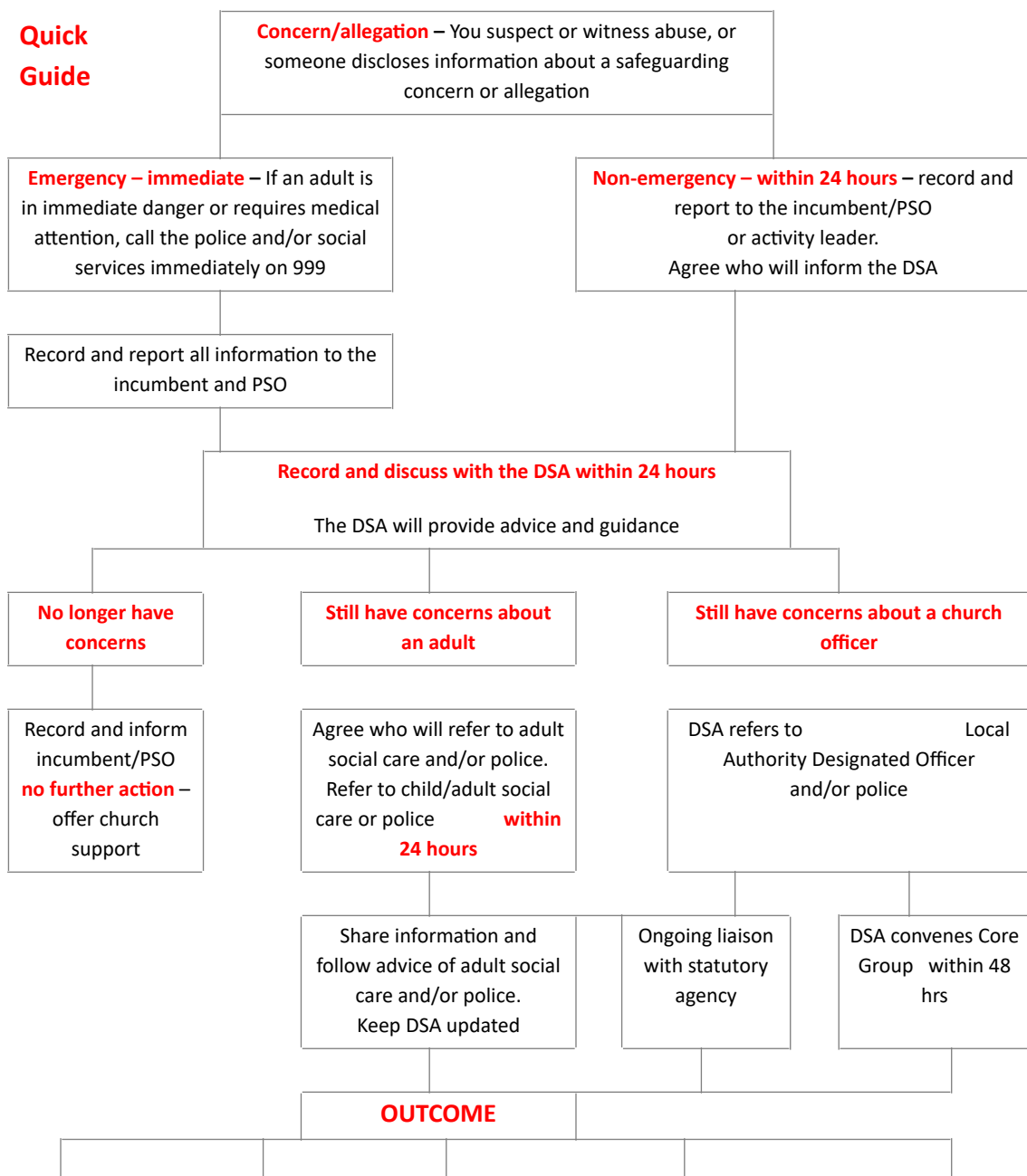
17.2 As detailed in the HOB *'Parish Safeguarding Handbook – Promoting a Safer Church'* 2018=2019 referral action to take should be as follows:

- If an adult needs urgent medical attention the appropriate emergency services should be called (999) or the person taken to the nearest Accident and Emergency department. The hospital staff should be told of any suspicions and the parish priest and/or PSO informed. They **must** then inform the DSA.
- If the adult is not in immediate danger then contact the PSO or incumbent, in the first instance. They **must** then contact the DSA. If neither are available, contact the DSA directly (if outside normal office hours via diocesan out-of-hours service). If the concern arises in an activity, discuss with the group/activity leader, who will contact the PSO or incumbent. Any safeguarding concerns must be reported to the DSA **within 24 hours**. If the PSO/incumbent or the DSA are not available within 24 hours, contact Adult Social Care and/or the police directly, if the concern is that an adult is being abused. Contact the Local Authority Designated Officer and/or police if the concern is that a church officer may be abusing an adult. Advise the PSO or incumbent as soon as possible that you have made a referral; they will advise the DSA. **If in doubt don't delay – seek advice from the statutory agencies.**
- Do not contact the person about whom a safeguarding concern or allegation has been made or anyone who may be implicated in the allegation or disclosure, even if they would normally be contacted as part of the procedure, until advice has been sought from the DSA or statutory agencies.
- Record the details of the concern or allegation. Where it is not appropriate to take notes at the time (usually it will not be), make a written record as soon as possible afterwards or before the end of the day. Record the time, date, location, persons present and how the concern or allegation was received, e.g. by telephone, face-to-face conversation, letter, etc. The record should include details of information provided to that person as well as the information received. Always sign and date the record. Keep it factual. Pass on a copy to the DSA (and/or the PSO/incumbent). The records should be kept secure and confidential.
- **If the concern is about an adult** the DSA will act in line with the HOBs' guidance. They will offer advice, support and guidance and help to make the required referrals. If there is a risk of harm, the concerns must be reported to the statutory agencies within 24 hours of the DSA receiving the concerns. There should be close communication between the DSA and PSO/incumbent until the situation is resolved. The archdeacon should also be informed.
- **If the concern also involves a church officer** the DSA will act in line with the HOBs' guidance. They will offer advice, support and guidance and refer the concerns to the Local Authority Designated Officer and/or police within 24 hours. The DSA will now take over the management of the safeguarding concern in conjunction with the core group (which will be convened within 48 hours) and statutory agencies. There may be a requirement for parish representatives to attend a subsequent core group/s. If there are doubts about whether or not to make a referral and under what route, the DSA will seek advice from the Local Authority Designated Officer.
- The procedure is the same for abuse disclosed by an adult which happened to them in the past, either as a child or as a younger adult. Great sensitivity is required in dealing

with this as it is likely to have been a major step for the individual to trust someone enough to tell them and the advice of the DSA should be sought.

- It can be problematic when someone in the congregation is under investigation for an allegation but not convicted. A proper balance must be struck between protecting the vulnerable adult and respecting the rights of the person against whom an allegation is made. In such circumstances the welfare of the vulnerable adult must come first. The rights of the person against whom the allegation is made are important and must be given due weight, once the immediate safety and protection of the vulnerable adult have been assured.

18 Responding Promptly to Every Safeguarding Concern or Allegation



No further action	Adult protection conference	Criminal prosecution	Disciplinary procedures	Risk management
<p>RECORD ALL ACTION – Consider the support needs of all those affected by allegations of abuse at all points in the above stages. Remember the safety and welfare of any vulnerable adult takes precedence over all other concerns.</p>				

19 Particular issues concerning vulnerable adults

19.1 **Reporting concerns about vulnerable adults** – Referrals of suspected abuse can be made to Adult Social Services, the police and other statutory bodies in the following circumstances:

- For a person over 18 with their consent.
- If the person is a vulnerable adult with the capacity to make the decision, the information belongs to them unless there is a public interest concern (see 19.2 below).
- The person does not have a capacity to make the decision (see 19.3 below).

19.2 **Public interest concern** – There are some circumstances in which sharing confidential information without consent will normally be justified in the public interest. These are:

- When there is evidence or reasonable cause to believe that the adult is suffering, or is at risk of suffering, significant harm.
- To prevent serious harm to an adult, including through the prevention, detection and prosecution of serious crime.

19.3 **Consent and capability** – *Consent*: For a vulnerable adult to give consent they should be able to understand and retain relevant information that is being given to them, believe it to be true and, weighing it in the balance, be able to make a choice. *Capability*: The starting point should be based on the presumption of mental capacity and on the consequent right of an adult to make their own choice in relation to their own personal safety.

19.4 **Good practice in sharing information about vulnerable adults** – Never make these decisions on your own. Safeguarding concerns should always be discussed with the DSA. This can be done, at least initially, without identifying the individual concerned both within the church and with the statutory services. Except in emergencies, the DSA would be the person who would normally liaise with the statutory agencies.

19.5 **Responding to an adult experiencing domestic abuse** – When supporting a person (women are more likely to face issues of domestic violence *but not* uniquely) consider the following:

- Do believe what s/he is telling you.
- Do reassure them.
- Don't minimise the danger.
- Give him/her contact details of local Refuges and where they can obtain legal advice/representation.
- Do support and respect their choices – even if they choose to return to their abuser.
- Help them with a safety plan, such as setting aside some money, collecting important papers or copies of papers (passports etc.) and having a change of clothes packed. Plan how they can exit the house safely.
- Protect confidentiality.

19.6 Where there are children in the household consideration will need to be given as to their protection. Under such circumstances total confidentiality cannot be promised as the family may need to be referred to Children's Social Services. The advice of the DSA should be sought on any domestic abuse case whether or not it involves children.

20 Recording, data protection and information sharing

20.1 **Opening a church safeguarding case file.** Good record keeping is an important part of the safeguarding task. A record, (called a case file) should be opened whenever a safeguarding concern or allegation occurs in a church. The record should include key contact details, dates of when the information became known and the nature of the concerns. The record should include ongoing actions with dates, other key documents (e.g. observation notes, reports, consent forms etc.) and the case closure date. Records should use straightforward language and be concise and accurate so that they can be understood by anyone not familiar with the case. (A model parish recording template is available at www.churchofengland.org/safeguarding).

20.2 **Record retention and security.** The safeguarding case files, whether electronic or paper, must be stored securely by the incumbent and the PSO. This should include identifying who should have access to them. Records in relation to safeguarding issues, even if they have not been proven, should be maintained in accordance with the Church's retention guidance. If the incumbent moves from the church, the records should be passed to the new incumbent.

20.3.1 **Data protection and information sharing.** In May 2018, the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 replaced the Data Protection Act 1998. The GDPR contains the principles governing the use of personal data. It should be noted that the GDPR and the Data Protection Act 2018 place greater significance on organisations being accountable and transparent in relation to their use of personal data. Parishes handling personal data need to have the proper arrangements for secure storage, handling, use and disposal of disclosures and disclosure information as detailed in Appendix A Part 13 (Diocesan GDPR Policy

Statement). See also information for parishes on data protection regime at www.parishresources.org.uk/gdpr.

- 20.3.2 Personal information in relation to safeguarding will often be sensitive and is likely to be classed as 'special categories of personal data' under the GDPR, which means extra care will need to be taken when handling such data. Nevertheless, it is important to be aware that the Data Protection Act 2018 includes specific reference to processing data in relation to the 'safeguarding of children and individuals at risk' and allows individuals to share, in certain situations, personal data without consent.

(There are also provisions that allow the sharing of personal data without consent for the prevention or detection of unlawful acts or to protect members of the public from dishonesty, malpractice or seriously improper conduct. However, legal advice should be sought before relying on these provisions).

- 20.3.3 The HOB *'Parish Safeguarding Handbook- Promoting a Safer Church'* 2018-2019 advises – *'The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe'* and this can equally be said to apply to vulnerable adults.

- 20.4 **Sharing without consent.** Information can be shared legally without consent, if a person is unable to or cannot reasonably be expected to gain consent from the individual concerned, or if to gain consent could place somebody at risk. Relevant personal data can be shared lawfully without consent if it is to keep a child or vulnerable adult safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental or emotional well-being.

Never make these decisions on your own. If you are going to share personal data, this should always be discussed with the DSA. Of course, you may be able to share data, at least initially, without identifying the individual concerned both within the church and with the statutory services.

Ultimately, the most important consideration is whether the sharing of information is likely to support the safeguarding of a child, young person or vulnerable adult.

(HOB Parish Safeguarding Handbook – Promoting a Safer Church 2018)

- 20.5 **The HOB Safeguarding Children Policy reminds parishes that there is nothing in data protection legislation which limits appropriate disclosure in order to protect a child or adult who might be at risk. What matters is that the information sharing should be reasonable and proportionate. Safeguarding issues will always take precedence over data protection**

21 Whistle blowing

- 21.1 The diocese is available for advice and support on whistleblowing. This is when a paid church officer decides to pass on information concerning a wrong doing, that they consider is in the public interest. This means it must affect others, e.g. the general public. This includes failure to adhere to health and safety requirements that place others in danger, a 'cover up' by someone and/or a criminal offence. It does not cover personal grievance or complaints. For further information see the safeguarding section on the diocesan website.

22 Useful telephone numbers

Diocesan Safeguarding Advisers

Fiona Coombs mob: 07548 232395
(lead for Ashford Archdeaconry; Thanet Deanery; East and West Bridge Deanerys)

fcoombs@diocant.org

Paul Brightwell mob: 07398 009951
(lead for Maidstone Archdeaconry; Canterbury Deanery; Reculver Deanery)

pbrightwell@diocant.org

Katy Harper(Trainer)
07732681789

kharp@diocant.org

Diocesan Safeguarding Website

www.canterburydiocese.org/safeguarding

Diocesan House Safeguarding Office/DBS Helpdesk

Karen Carolan-Evans

01227

459401

Diocesan House
Lady Wootton's Green, Canterbury,
Kent, CT1 1NQ

safeguarding@diocant.org

Childline Freepost 1111, London N1 0BR

0800 1111

www.childline.org.uk

Family Lives

0808 800 2222

www.familylives.org.uk

e-mail:

parentssupport@familylives.org.uk

KCC Social Services Main Contact

03000 41 41 41

KCC Adult Social Services

03000 41 61 61

KCC Children Social Services

03000 41 11 11

KCC Child & Families Information Services

03000 41 23 23

KCC Social Services Out of Hours

03000 41 91 91

Holy Cross Children's Advocate Beth Lloyd

01622 737902

Holy Cross PSO Malcolm Underdown

01622

739365

Holy Cross PDO Christine Underdown

01622

739365

Emergency Services

999

Police non-emergency

101 (24 hrs)

NSPCC (for adults concerned about a child)

0808 800 5000

Action on Elder Abuse helpline

www.nspcc.org.uk

24-hour National Domestic Violence helpline

0808 808 8141

NAPAC (for survivors of childhood abuse)

www.elderabuse.org.uk

Stop It Now (to prevent child sexual abuse)

0808 2000 247

Cruse bereavement helpline

0808 801 0331

MACSAS (for people abused by church officers)

0808 1000 900

Samaritans (for people struggling to cope)

www.stopitnow.org.uk

0808 808 1677

Sources of support for victims/families of

0808 801 0340

abuse:

116 123

The Survivors Trust

Safeline

<http://>

SupportLine

thesurvivorstrust.org

www.safeline.org.uk/what-can-friends-and-

Victim Support

[family-](http://www.safeline.org.uk/what-can-friends-and-family-)

[members-do-to-support-survivors-of-sexual-](http://www.safeline.org.uk/what-can-friends-and-family-members-do-to-support-survivors-of-sexual-)

[abuse](http://www.safeline.org.uk/what-can-friends-and-family-members-do-to-support-survivors-of-sexual-abuse)

Other Websites:

www.supportline.org.uk/problems/

www.womensaid.org.uk

[rape_sexual-](http://www.supportline.org.uk/problems/rape_sexual-)

www.restoredrelationships.org

[assault.php](http://www.supportline.org.uk/problems/rape_sexual-assault.php)

www.scie.org.uk

www.victimsupport.org.uk/crime-info/

www.ceop.police.uk

[types-crime/childhood-abuse](http://www.victimsupport.org.uk/crime-info/types-crime/childhood-abuse)

www.modernslavery.co.uk

www.ageuk.org.uk

www.barnardos.org.uk

www.spiritualabuse.com

<https://carers.org>