Safeguarding Policy and Procedure Writing Toolkit

Contents

November 2017

1   Introduction

The purpose of this toolkit is to help you think about how to develop and implement safeguarding policies and procedures that are relevant to your organization or group but are congruent with the national safeguarding procedures of the Catholic Church in England and Wales.

A safeguarding policy is a statement that sets out the ideas and plans of the organization, setting or group in relation to what it will do to keep children and adults at risk safe. Procedures set out the actions that are to be taken to respond to concerns and allegations.

The Catholic dioceses and religious congregations in England and Wales have adopted a 'one-church' approach and implement the national safeguarding policies and procedures of the Catholic Church in England and Wales. This includes all activities and groups that come under the responsibility of a diocese or religious congregation and should also be adopted by lay associations of the faithful ministering to children and adults at risk in the name of the Catholic Church.

Whilst recognizing the status of the national safeguarding policies and procedures, a Catholic organization, setting, or group might write their own safeguarding policies and procedures to ensure that the national safeguarding policies and procedures are tailored to their specific context and that they are clear and understood by those to whom they apply. Locally produced policies and procedures should not conflict with the overarching principles and requirements of the national safeguarding policies and procedures of the Catholic Church in England and Wales.

For organizations seeking to use the umbrella body services of CSAS for the processing of DBS Disclosures, as a minimum your safeguarding policy and procedure must address safer recruitment and responding to concerns and allegations. You will also need to demonstrate that you have an organizational infrastructure that includes a lead and where relevant, other named safeguarding roles, to support good safeguarding practices and the management of concerns and allegations.

CSAS has produced a range of relevant safeguarding policies and procedures and guidance about safer environments, safer recruitment and managing allegations that should be used to inform the development of your specific policies and procedures. www.csasprocedures.uk.net

2   Preparation

Before writing the policy and accompanying procedures, it is helpful to think about:

> …   the potential risks to children and adults at risk in your organization, setting or group e.g. location/venues/activities/events/employees and volunteers/visitors etc;

NCSC
National Catholic
Safeguarding Commission

CSAS
Catholic Safeguarding
Advisory Service

... the safer recruitment processes you need to in place to reduce the risk of unsuitable people gaining access to children and adults at risk;

... the range of other procedures required to address potential risks e.g. safe use of images, photographs and video, e-safety etc;

... the different ways in which concerns might be raised, for example, but not confined to situations when:

  : a child or adult at risk may disclose something that has upset or harmed them;

  : someone else might report something that a child or adult at risk has told them or that they believe that a child or adult at risk has been or is being harmed;

  : there may be signs of physical injury for which there appears to be no explanation;

  : a child's behaviour may suggest he or she is being abused;

  : the behaviour or attitude of one of the workers towards a child or adult at risk may cause concern;

  : a child demonstrates worrying behaviour towards other children;

... the procedures that need to be in place to respond to concerns and allegations;

... the procedures that need to be in place to manage concerns and allegations raised in relation to employees, volunteers or others associated with the organization, setting or group;

... the processes you will utilize to ensure that everyone, including children and adults at risk, is aware of and understands the safeguarding policy, as well as how people will be told about the safeguards, including disabled people and people who use different languages;

... whether training on the policy and procedures will be required by different groups and how this will be provided.

...

3   Initial considerations

Governance

There should be clear lines of reporting and identified safeguarding leads in every organization, setting or group. Identifying a clear governance structure becomes very important when organizations are undertaking ministry in many different geographical areas or on different sites. In these circumstances it will be necessary to identify a central safeguarding lead as well as local safeguarding leads.

Role of the Designated Safeguarding Person/Lead

The CSAS Procedures Manual largely focuses on the referral process to local authorities and the involvement of diocesan or congregational safeguarding staff, namely the Safeguarding Coordinators or Religious Safeguarding Leads.   A more localized policy and procedure will set out who in your organization is the Safeguarding Lead.

The role of the Designated Safeguarding Person is specified in the Children Act 2004 to ensure that every organization has a 'named person' for safeguarding children and young people. Prior to that, the role had frequently been known as the Child Protection Officer. See also Annex B of Keeping Children Safe in Education (2015) refers to a safeguarding Lead and more information about this role is set out in Annex B.

The Designated Safeguarding Person/Lead has a responsibility at both a strategic level within the organization and operationally on a day to day basis.   The person holding the role is the first point of contact for all staff and volunteers to go to for advice if they are concerned about a child, young person or adult at risk (this may also need to be out of hours so staff and volunteers should always know how to contact them or you can also appoint a Deputy). This person should also be the first point of contact with statutory agencies and other organizations and take responsibility for developing, disseminating, and updating the policy and procedures, making safeguarding recommendations and decisions within the organizational structure, ensuring there is adequate and appropriate safeguarding training for those that require it, supporting individuals at risk and staff/volunteers, monitoring compliance with policy and procedure and working closely with Human Resources/legal staff in complex cases.

To fulfil this role, the Designated Safeguarding Person/Lead should also have a sufficiently high level of decision-making powers and responsibilities within the organization, setting or group as well as relevant experience and a good knowledge and understanding of safeguarding practice.

The safeguarding structure should also include other lines of reporting e.g. the person to whom concerns are escalated, links with the diocesan safeguarding office, religious safeguarding lead in the congregation or religious safeguarding commission.

4   Writing a safeguarding policy and procedure

The policy document
A policy can be a simple 1-2 page document that includes:

- … explicit identification of the purpose and function of the organization, setting or group and its core values;
- … a statement setting out the commitment to safeguarding children and adults at risk;
- … what the organization, setting or group will do to keep children and adults at risk safe and respond to concerns;
- … a list of the supporting procedures that accompany the policy e.g. safe use of images, photographs and video, e-safety, safer recruitment, etc.

Additionally, a policy should:

- … clarify to whom the policy applies (e.g., all responsible adults);
- … clarify to whom the policy relates (e.g., all children and adults at risk or just one of these groups);

... define key terms, such as:

      :   responsible adults – those in a position of responsibility (paid or unpaid) with access to children and adults at risk;

      :   children – those up to the age of 18 years;

      :   adults at risk – people over the age of 18 years who have a need for care and support, or who are experiencing or are at risk of neglect or abuse;

... state how the policy will be put into action;

... state how the needs of children from minority ethnic groups and disabled children are understood and the barriers they face;

... refer to the main legislation and guidance that supports the policy.

If you are using an existing template, adapt where necessary to ensure it is applicable to your specific circumstances.

The procedures

Procedures are practice-based guidance that applies the policy to the work of a specific organization, setting or group, denoting a clear course of action in response to a situation.

Safer recruitment procedures

These procedures should set out clearly the steps to be taken in the recruitment and appointment process of employees and volunteers. This are likely to include, but are not limited to, information about:

... advertising and making the position known;
... use of an application form;
... DBS Disclosure and self-declaration of relevant offences for eligible roles;
... interview/formal discussion;
... identity verification;
... references.

More information about procedures in relation to safer recruitment can be obtained at add link to national safer recruitment procedures.

Procedures in respect of responding to allegations and concerns should include:

... identification of key roles to whom concerns and allegations should be reported e.g. group leader, safeguarding lead, who will then decide what (if any) further action is required;
... the role of the group leader or safeguarding lead in deciding what action needs to be taken;
... any links to be established with the diocesan safeguarding office or safeguarding coordinator for the religious commissions;
... reporting directly to the police and/or social services if the safeguarding lead is not available or a child or adult at risk is considered to be in immediate danger;

... the process for contacting children's services, adult services or the police;

... agreeing a process for escalation of concerns if there is a disagreement about the required course of action or action is not taken by the safeguarding lead, including reporting directly to the police and/or social services;

... guidelines about how and when to discuss the concern with the child and/or family (this should only take place on the advice of the police and/or social services);

... the procedures that will be followed if allegations are made or concern arise in relation to a responsible adult within the organization, setting or group;

... keeping a clear written record of any concern identified and actions taken (see template CASE6 add link in the forms library).

Links to other relevant documents

As well as ensuring the policy and procedure is relevant to your specific organization, setting or group, the content should also make clear links to other relevant policies and procedures e.g. whistleblowing, safer recruitment etc.

Presentation

Clear writing and formatting will make guidance more readable, and a consistent, uncluttered style of writing and formatting improves accessibility – See **Appendix A**.

Participation and consultation

The policy and procedure needs to be useful and relevant to the organization, setting or group. To ensure optimum relevance and buy-in from those that it affects, the policy and procedure should be developed collaboratively with relevant stakeholders – See **Appendix B**.

5 Implementation and review

It is important that staff and volunteers – new and existing – understand the purpose of your policies and procedures.

The safeguarding lead must ensure that all responsible adults are familiar with the policy and procedures and know how to act on concerns and allegations.

Once your policy and procedure is ready for implementation you will need to consider, how you will communicate the policy and procedure to all those to whom it relates and ensure they are being used and followed. You will also need to decide on an appropriate timescale for review.

Suggestions for communication and awareness raising

... Develop a training program that all staff and volunteers have to undertake

... At the end of any training or information session, ask participants to complete a short quiz to show they have understood the information

... Include the policies and procedures, and where to access them, into your induction and orientation programs, or into your volunteer handbook if you have one

… Create posters or process charts to post around the workplace to keep key messages firmly in mind

… Regularly promote a policy or procedure in internal newsletters or at team meetings.

6   Sample Structure

This part of the toolkit will walk you through the key sections that are usually covered in policies and procedures. Under each section, there are notes and questions for you to consider.

The structure and examples provided are aimed to stimulate thought and discussion and can be replicated without obtaining consent from CSAS. If you replicate the content of policies and procedures developed by other bodies, you should seek their consent to use the material.

Section 1.   Basic Information

There are certain elements that should be present in all policy documents.

These usually include the following:

Name of Organization / Setting	e.g. The Catholic Charity
Name of Policy	e.g. Safeguarding Policy and Procedure for Children, Young People and Adults at Risk (as appropriate)
Policy No.	e.g. SP01
Version	e.g. V3_SP01_23.04.17
Author	e.g. Sr Mary White
Contributor(s)/ Editor(s)	e.g. John Green, Josie Brown
Ratified by	e.g. The Board of Trustees
Date	e.g. 23 November 2017
Date for review	e.g. 23 November 2019

Section 2.   General Principles

To contextualize the policy and procedure within a faith setting, you may consider it appropriate to lead with some general principles, scripture and/or quotations from key documents such as the Cumberlege Commission Report (2007), and Integrity in Ministry (2016).

> ### *General Principles - example*
>
> Every human being has a value which we acknowledge as coming directly from God's creation of male and female in his own image and likeness. We believe therefore that all people should be valued, supported and protected from harm. We recognise the personal dignity and rights of vulnerable people towards whom the Church has a special responsibility.
>
> The Catholic Church and its individual members will undertake appropriate steps to maintain a safe environment for all, by practising fully and positively Christ's Ministry towards children, young people and adults and responding sensitively and compassionately to their needs in order to help keep them safe from harm. This is demonstrated by the provision of carefully planned activities for children, young people and adults, caring for those hurt by abuse and ministering to and robustly managing those who have caused harm.
>
> The Catholic Church of England and Wales, the Bishops and Religious Congregational Leaders are committed to safeguarding as an integral part of the life and ministry of the Church and affirm a 'One Church' approach[1] to safeguarding children, young people and adults at risk through the promotion of a sustained culture of constant vigilance. The 'best interests' or 'paramount chief principle', which underpins and is enshrined in child and adult protection legislation, shall be the primary consideration in all matters of safeguarding.
>
> ### *Key Principles Children - example*
>
> The Catholic Church in England and Wales embraces its role in supporting children to achieve their full potential in an environment where they are protected from exploitation, abuse and maltreatment.
>
> All adults within the Church have a responsibility to act and intervene when it appears that children need to be made safe from harm, whether the risk of harm is Neglect, Sexual Abuse, Physical Abuse or Emotional Abuse.

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[1]

 The One Church approach refers to the commitment by the Church in England and Wales to using the same policies, procedures, standards and systems in relation to safeguarding.

The Church will act in an open, transparent and accountable way in working in partnership with Children's Social Care Services, the Police, Health Agencies, Probation Providers and other agencies to safeguard children and assist in bringing to justice anyone acting in the name of the Church who has committed an offence against a child.

Anyone who brings concerns or allegations to the notice of the Church will be responded to sensitively, respectfully and seriously. All concerns and allegations will be dealt with within the national procedures and in a timely manner.

The Church is fully committed to acting within the guidance as set out in Working Together to Safeguard Children 2015 Keeping Children Safe in Education 2015, and acknowledges that the Church must work in partnership with other agencies and not act alone.

Pastoral care will be made available to children and their families and to other relevant people where there have been concerns and allegations of some form of harm or maltreatment of a child.

Where services and support are provided to an adult, who has acted to harm a child, safeguards should be put in place to manage the risk that the adult may harm another child.

Key Principles Adults at Risk - example

The Catholic Church in England and Wales is fully committed to work in relation to Adults, who may be at risk of abuse or maltreatment. The Church will:

… Work actively and constructively within the framework set out in the Care Act 2014 and Social Services and Well-being Act (Wales) 2014, and with associated statutory and good practice guidance;

… Actively promote the empowerment and well-being of adults throughout the church;

… Recognise that everyone has the right to live their life free from violence, fear and abuse;

… Recognise that adults have the right to be protected from harm and exploitation;

… Recognise that adults have the right to independence that involves a degree of risk; and

… Act in an open, transparent and accountable way in working in partnership with Adult Social Care Services, the Police, Health Agencies, Probation Providers and other agencies to safeguard adults and assist in bringing to justice anyone acting in the name of the Church who has committed an offence against an adult.

Adapted from the CSAS national safeguarding procedures manual, section 1

Section 3.   Purpose and Scope

The policy and procedure should be clear about:

Purpose/aims of the policy and procedure

… Whom does it aim to protect – children, adults at risk or both?

… Does it apply to staff/volunteers who might become an 'adult at risk'?

… Depending on the knowledge and understanding of your workforce on the practice of safeguarding, you may wish to include informative and context-specific information to help raise awareness of matters such as disclosure processes, why abuse victims and survivors might not ask for help and if they do why they may subsequently retract, and how best to approach those who have already been traumatized by abuse.

Who must adhere to the policy and procedure?

… Does it apply to all adults, including volunteers, in the organization?

… Does it apply to sessional workers and consultants who come on site?

… Does it only apply to those who have direct contact with children / young people / adults at risk through their work with the organization/setting/group?

Purpose and Scope example (Children)

This policy applies to all employees, including senior managers and the board of trustees, and sessional workers, agency staff, students or anyone working on behalf of -------------

The purpose of this policy is to:
Protect children and young people who receive -------------'s services. This includes the children of adults who use our services.
Provide those working on behalf of ------------- with the overarching principles that guide our approach to safeguarding and child protection

---------------- believes that a child or young person should never experience abuse of any kind. We have a responsibility to keep them safe. We are committed to practice in a way that protects them.

(from '_Writing a Safeguarding Policy_', NSPCC)

Section 4.   Equality Statement

With Jesus as our model, in his defense of minorities and the oppressed, it is important that the church embraces all individuals with a spirit of love, tolerance and without discrimination.

Your organization should make sure that all children, young people and adults have the same offer of support, response and protection regardless of:

- Age
- Disability/ability
- Health status (e.g., mental health/HIV/ substance misuse)
- Gender
- Pregnancy/maternity

- Gender identity
- Sexual orientation
- Gender reassignment
- Class/social status
- Marital or relationship status

- Race ethnicity
- Immigration status
- Housing status
- Cultural identity
- Religion / beliefs
- Political beliefs
- Financial status

Your policy and procedures should refer to the need for all to be treated with dignity and respect and state your commitment to anti-discriminatory practice. Your policy should explicitly recognise the additional needs of children and adults at risk who are disabled or from minority ethnic groups for example and recognise the barriers they may face, especially around communication, being believed, and possible mistrust of authority.

We are committed to promoting equality, valuing diversity and working inclusively across our entire organization/group.

We uphold these principles in our behaviours and practices towards everybody who works for our organisation/group and those who use or take part in our organisation/group.

We oppose all forms of discrimination and intolerance in our work and we have a zero tolerance approach to bullying, harassment and victimisation. We will not tolerate discrimination against those who work within or use our organisation/group and have one or more of the protected characteristics:

- … Age
- … Disability
- … Gender
- … Gender reassignment
- … Marriage and civil partnership
- … Race
- … Religion or belief
- … Sexual orientation
- … Pregnancy and maternity

Section 5.   Legal Framework and Definitions

You will need to position your policy within the broader legislative and statutory guidance framework of England and Wales and any other safeguarding policies and procedures that you have adopted. You may also want to append definitions of abuse and neglect (see Appendix B).

Legal Framework example

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

- … Children Act 1989
- … United Convention of the Rights of the Child 1991
- … General Data Protection Regulation(EU) 2016/679
- … Human Rights Act 1998
- … Sexual Offences Act 2003
- … Children Act 2004
- … Safeguarding Vulnerable Groups Act 2006
- … Protection of Freedoms Act 2012
- … Children and Families Act 2014
- … Special Educational Needs and Disability (SEND) code of practice for 0 to 25 years: Statutory guidance 2014
- … Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2015
- … Working together to safeguard children: A guide to interagency working to safeguard and promote the welfare of children 2015
- … Keeping Children Safe in Education 2015

See link for further guidance.

The policy should be read alongside our policies and procedures on:

- … Safe recruitment, induction and training
- … The role of the designated safeguarding lead
- … Dealing with disclosures
- … Managing allegations against staff and volunteers
- … Recording and information sharing
- … Code of conduct
- … E-safety
- … Anti-bullying
- … Complaints
- … Whistleblowing
- … Health and Safety
- … Training, supervision and support
- … Lone working
- … Quality assurance

(from 'Writing a Safeguarding Policy', NSPCC) Please note that this list is not exhaustive.

Section 6.   Procedures

You will need to set out the procedure to be followed if somebody is concerned about the welfare of a child or adult at risk or if an allegation of abuse is made. The procedures must take account of the actions to be taken if the concern or allegations relate to employees or volunteers.

The procedure will need to set out the principle lines of reporting and what action should be taken if key individuals cannot be contacted or there is a disagreement about the action to be taken.

For example:

If an employee or volunteer receives an allegation or is concerned about the welfare of a child or adult at risk they must report this in the first instance to the group leader/safeguarding person/lead for the organization. If this person is not available the concern or allegation should be reported to………

If a child or adult is considered to be at immediate risk of harm, the matter should be referred directly to the Police and the safeguarding person/lead (or other nominated person) must be notified at the earliest opportunity.

The safeguarding person/lead will usually seek consent from parents/carers to make a referral to the Local Authority Children's Services Department. However, if the concerns are considered to be a child protection matter, no consent is required as to involve the parents or refusal to make the referral might compromise the safety of the child.

Information will be shared with families, unless to do so would compromise a child's safety as directed by statutory agencies.

A record of concerns and actions must be made in writing and provided to the safeguarding person/lead within 24 hours.

You must also set out the process to be followed if concerns relate to the group leader or safeguarding lead. Specify who the concern or allegation is to be reported to.

For quick reference, it may be useful to develop a flowchart and bullet points to detail procedures for reporting concerns and allegations within the organization or group and for reporting to outside agencies.

7.   Useful Resources

List any forms (e.g. incident forms, templates etc.), resources or links to organizations that may be useful or required in the course of safeguarding work.

8.   Key Contacts

It's always useful to have a list of key safeguarding contacts in your policy. This sheet can be displayed around buildings so that information is readily available and accessible to all when required. For example:

Contact Details

Designated Safeguarding Person/Lead:
Name:
Email:
Phone:
Work days:
Out of hours contact information:

Deputy Designated Safeguarding Lead:
- … Name:
- … Email:
- … Telephone:
- … Work days:
- … Out of hours contact information:

Senior (or other) Lead(s) for Safeguarding:
- … Name:
- … Email:
- … Telephone:

Children's Social Care Services – Child Protection
- … Email:
- … Telephone:
- … Operational hours:
- … Out-of-hours Duty Team:

Children's Social Care Services – Early Help and Early Intervention
- … Email:
- … Telephone:
- … Operational hours:

Parish Safeguarding Representative
- … Email:
- … Telephone:
- … Operational hours:

Diocesan Safeguarding Coordinator or Congregational Safeguarding Lead:
- … Email:
- … Telephone:
- … Operational hours:

Safeguarding Commission Chair
- … Email:
- … Phone:
- … Operational hours:

CSAS
- … Email: admin@csas.uk.net
- … Phone: 020 7901 1920
- … Operational hours: 9am to 5pm, Mondays – Fridays

Local Authority Designated Officer (LADO) for all allegations against responsible adults of harm caused to a child or young person:
- … Email:
- … Telephone:
- … Operational hours:

Adult Social Care Services – Safeguarding
- … Email:
- … Telephone:
- … Operational hours:
- … Out-of-hours Duty Team:

Police
- … Emergency: 999
- … Non-emergency: 100
- … Child Abuse Investigation Team / Unit:
- … Met- Sapphire (Sexual Assault):
- … Met- Forced Marriage Unit:
- … Met- Project Azure (FGM):
- … Child Exploitation Online Police: www.ceop.police.uk

NSPCC 24-hour Helpline
- … 0808 800 5000

9.   Acknowledgement Form

You may wish to keep a record of all those who have seen, read and understood your policy and procedures document(s). You can include a short form at the end of your document for employees and volunteers to sign and return.

Appendix A - Style

A clear, uncluttered writing style will ensure that your policy and procedure is more readable. Consistent formatting and a consistent style will help to ensure that your policies and procedures are accessible and more effective.

Writing Style

... be clear and concise;

... write in the third person;

... keep sentences short and simple;

... avoid florid language and over-use of adjectives / adverbs;

... select words carefully for accuracy and appropriateness;

... avoid the use of contractions (I'll, we'll);

... use words such as 'should' and 'may' carefully as these words can imply choice, whereas 'must' denotes obligation.

Formatting Style

... aim to keep your policy or procedure to under 2 sides of A4 paper;

... apply a consistent look across the document: ensure that fonts, headings and paragraphs are uniformly formatted throughout the document (consider using 'Styles' in MS Word or similar);

... arial 12 or similar sans serif font, single spacing, 12pt after paragraph;

... use an outline format to detail different topics under each category;

... start with a brief, shorthand outline;

: later, once you have gone through once and written down all your initial ideas, you can go back through and lengthen the sections accordingly;

: outlines allow you to explore deeper aspects of each policy or category, adding in stipulations and specifics as you go;

: for ease of reference, use numbers to order each section and category;

... when using acronyms, spell out the words the first time, then indicate the acronym in parenthesis, e.g., Catholic Safeguarding Advisory Service (CSAS);

... save your document with a title that describes its content – e.g., 'St Catherine's Parish Safeguarding Policy – 06.06.2017', and save it in folders where it can be readily accessed by relevant staff.

Appendix B - Categories and indicators of abuse

For more information about categories and indicators of abuse in relation to children and adults use the following links to information in the national safeguarding procedures manual:

[Abuse and neglect in adults](#)

[6 key principles underpin all adult safeguarding work](#)

[Abuse of children](#)

Appendix C - Participation

Policies and Procedures should be living documents that are understood by those to whom they relate, those who must apply them in practice and, more widely, by the larger community. This ensures both accountability and effectiveness of implementation. It is useful to seek broad participation and input when developing new policies.

Involving others in development can be initially time-consuming. Nonetheless, consultation and collaboration tends to pay off in terms of:

- … comprehensiveness;
- … broad buy-in/adherence;
- … embodiment of an ethos and culture of zero tolerance attitudes to abuse of any kind.

Tips for Engagement
- … be clear and up-front about the levels of participation and input you are seeking;
- … involve people from different parts of the organization to make sure the policy is relevant to everyone's work;
- … think about how you can involve children and young people, adults at risk, and minority views, to incorporate their perspectives;
- … ask different people in different roles to give feedback on the policy to ensure it is accessible, inclusive and adapted to everybody.

Levels of Participation
There are different levels of participation, both within an organization and with the stakeholders of policies and procedures, which can be used when producing guidance. It is likely that you will involve different stakeholders in different way utilizing different levels of participation.

Co-production: High levels of input, high levels of decision-making

Co-designing: High levels of input, moderate decision-making

Engaging / Consulting: Reasonable input, no decision-making

Informing / Educating: Nominal input, no decision-making

Coercing: Tokenism/exploitation, no input or decision-making

Increasing levels of participation

Doing With

Doing For

Doing To