



SAFEGUARDING POLICY

Safeguarding Officer:	Angela Fox	07788914565
Deputy Safeguarding Responsibility:	Andrew Barnard	07379112471
Trustee with Safeguarding Responsibility:	Val Spencer	07968276701
Adopted:	24 th September 2024	

Overview:

As a Christian organisation, Steps: Mentoring and Coaching affirms our belief in the God-given value of every individual with whom we work or have contact. In recognition of God's wholehearted commitment to them, we are committed to treating each individual with value and dignity and aim that none suffers abuse of any kind.

It is the responsibility of each one of us to safeguard children, young people and adults at risk of harm against any form of harm and to report any abuse discovered or suspected. With this in mind, Steps: Mentoring and Coaching is committed to supporting, resourcing and training all those who work with children, young people and adults at risk of harm across our ministries.

Steps: Mentoring and Coaching will review this safeguarding policy on an annual basis.

Steps: Mentoring and Coaching is a member of Thirtyone:eight (formerly known as CCPAS) as a demonstration of our commitment to safeguarding. This enables us to gain both up-to-date, expert support at a national level and to provide the same level of support and guidance to our ministry.

There are a number of additional policies and guidance documents referred to within this policy which are available from the Steps: Mentoring and Coaching office – please email admin.steps@mentoringandcoaching.org

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Organisational Details

Name of Organisation: Steps: Mentoring and Coaching

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Part One: Safeguarding Policy

Introduction

Steps: Mentoring and Coaching is committed to the prevention of abuse and the appropriate handling of suspicions or concerns regarding the abuse of children, young people and adults at risk of harm. We recognise that each individual worker (employed staff, volunteer or trustee) is responsible for ensuring everyone in their care is kept safe from harm and any concerns regarding the infliction of harm or the failure to prevent harm are reported appropriately.

Steps: Mentoring and Coaching will ensure that children, young people and adults at risk of harm in our care are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern. A sample poster to display relevant contact details is available from Thirtyone:eight or Steps: Mentoring and Coaching which is available at all events and activities as far as is possible.

A. Responding to an Allegation or Suspicion of Abuse

1. Reporting Responsibilities

If abuse is suspected, observed, disclosed or otherwise alleged; under no circumstances should a worker carry out their own investigation. In all cases, they should follow the procedures as below:

The person in receipt of an allegation or who has suspicions of abuse should report concerns as soon as possible to their **Safeguarding Officer**:

Safeguarding Officer: Angela Fox 07788914565

In the absence of the Safeguarding Officer or, if the suspicions in any way involve the Safeguarding Officer, then the report should be made to the *Deputy Safeguarding Officer*:

Deputy Safeguarding officer Andrew Barnard 07379112471

Other Helplines (National Contacts)

Regional Child Protection Unit: 0344 800 8020

Police Emergency: 999

Other Helplines (Local Contacts)

The absence of the nominated safeguarding officers should not delay referral of the allegation to the relevant bodies. Therefore, if for some reason, the Safeguarding Officer, Deputy Safeguarding Officer and/or the Designated Safeguarding Lead within the Trustee Board are all unavailable then the individual should take action themselves (in accordance with their training and following the process below themselves). They should continue to make every effort to contact the safeguarding officer as the process develops. They should also contact the Thirtyone:eight Helpline which is available Monday – Friday, 9am – 5pm on 0845 120 4550 and Out of Office hours for emergencies that cannot wait until the next working day on 0303 003 1111. Thirtyone:eight will be able to advise on the appropriate next steps, which may involve contacting the local Social Services or Police.

Children's Advice and Duty Service 0344 800 8021

Thirtyone:eight 0845 120 4550 (Monday – Friday, 9am – 5pm)
0303 003 1111 (out of hours)

2. Process for Safeguarding Officers

The role of the safeguarding officer is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies who have a legal duty to investigate. It is not the role of the Safeguarding Officer, or anyone within Steps: Mentoring and Coaching to investigate allegations and concerns, unless directed to do so by the relevant statutory agency or advised by Thirtyone:eight to explore and gather more information. A written record of the concerns, observations or disclosure should be made as soon as practically possible (ideally within 1 hour) in accordance with these procedures and kept in a secure place. The date, time, location and people present should be included in the written record. (A sample reporting form can be found in Appendix C)

a.) Dealing with Allegations of Physical Injury, Neglect or Emotional abuse

If a child, young person or adult at risk of harm has a physical injury, a symptom of neglect or where there are concerns about emotional abuse, the Safeguarding Officer will:

- *Contact Children's Social Services immediately for advice in cases of deliberate injury or if a child/young person/adult is at risk of harm or is afraid to return home. If there is immediate danger, threat or risk from further harm, then the police may be contacted.*
- *Seek and follow advice given by Thirtyone:eight (who will confirm their advice in writing by email) if unsure whether or not to refer a case to Children's Social Services.*
- *Seek medical help if needed urgently, informing the doctor of any suspicions.*
- *Not tell the parents or carers unless advised to do so by social services or Thirtyone:eight.*
- *For concerns related to poor parenting, they will encourage parent/carer to seek help, but not if this places anyone at potential risk of harm. Where the parent/carer is unwilling to seek help, they will offer to accompany them. If they still fail to act, contact Children's Social Services for further advice.*

b.) Dealing with Allegations or Suspicions of Sexual Abuse

In the event of allegations or suspicions of sexual abuse, the Safeguarding Officer will:

- *Contact the Children's Social Services Department or Police Child Protection Team direct. They will NOT speak to the parent/carer or anyone else.*

- *Seek and follow the advice given by Thirtyone:eight if, for any reason they are unsure whether or not to contact Children's Social Services/Police. Thirtyone:eight will confirm its advice in writing for future reference.*

c.) Dealing with Allegations or Suspicions relating to Staff or Volunteers

If an allegation is made against a worker (employed staff, volunteer or trustee) whilst following the procedure outlined above, the Safeguarding Officer will inform the Local Authority Designated Officer within Children's/Social Services (Terminology Note: this role has different titles in different areas.) The Designated Safeguarding Lead within their own Trustee Board will also be informed. If the allegation involves the designated safeguarding lead then the Chair of the Board will be informed.

In any of the cases above, the safeguarding officer will:

- *keep their nominated trustee informed*
- *keep the National Safeguarding Officer informed*
- *not discuss details of the case to anyone else, other than those nominated above*
- *seek advice from Thirtyone:eight and follow their guidance – this can be done at any stage, but is most helpful and effective when advice is sought at the earliest possible time*

3. DBS or Disclosure Scotland Referrals

Where there is a proven allegation against a worker (employed staff, volunteer or trustee), there is a requirement under law to make a referral to the DBS (or Disclosure Scotland) who manage and maintain the lists of people barred from working with children, young people and adults at risk of harm. We have a duty to ensure that individuals who pose a threat to vulnerable groups can be identified and barred from working with these groups. The duty is upon us as a 'regulated activity' provider, which includes churches and other voluntary organisations. They must be informed by way of a referral where the 'employer' (of a paid or volunteer worker) withdraws permission for an individual to be engaged in the relevant activity, or would have done so had that individual not resigned, retired, been made redundant, or been transferred to a position which is not regulated or controlled. The referral should be made when the organisation has obtained sufficient evidence and, where appropriate, has consulted with the relevant statutory designated officer. Further information and advice is available from Thirtyone:eight.

4. Charity Commission Notification

Any serious safeguarding incident involving a Steps: Mentoring and Coaching worker must also be reported to the Charity Commission by the Designated Safeguarding Lead within the Trustee Board. They have a duty to report what happened and explain how this was handled, even if you have reported it to the police or another agency. Further guidance can be obtained from the Charity Commission. This applies to where the incident relates to a worker whether employed or a volunteer.

B. Prevention of Abuse

1. Safer Recruitment of Staff and Volunteers

Having in place robust practices surrounding the recruitment of staff and volunteers; including trustees, is an essential element in our safeguarding arrangements. These help to deter, detect and prevent those we would wish not to be working with children, young people and adults at risk of harm from doing so at the earliest point. Steps: Mentoring and Coaching will ensure all staff and volunteers are appointed and supervised in accordance with a safer recruitment policy and guidelines. It is advised that suitable questions around safeguarding should be asked as part of the interview process.

2. Guidance on Recruiting Workers with a Criminal Record

If there is evidence that an applicant for a role has a criminal record, either through self-disclosure or through the DBS check, or it comes to light that a current worker or volunteer has a previously undisclosed criminal record, then the following guidelines outline the relevant process.

a) Context

The Police Act 1997, the Rehabilitation of Offenders Act 1974 and the ROA (Exceptions) Order 1975 will apply. As Steps: Mentoring and Coaching, we recognise that gaining employment is an essential part of successful individual rehabilitation and that failure to secure employment or meaningful voluntary opportunities can be a key reason for re-offending. Consideration must be given as to whether Steps: Mentoring and Coaching is an appropriate place for this rehabilitation for each individual. It is unlikely that any policy can cover all of the circumstances which may arise, but the intention is to ensure equal opportunity and fairness to all prospective members of staff and volunteers.

b) Recruitment and Employment

Offers of work will be based primarily on the person's ability to undertake the tasks as stated in the job or role description. The nature of any criminal conviction will be considered as to its relevance to the work in question and will not of itself be a reason for non-employment. An assessment will be carried out by the Trustees, with advice from Steps: Mentoring and Coaching Safeguarding Officer and HR Manager. Risks will be assessed, and consideration given to not allowing a risk to be knowingly imposed on any of those whom Steps: Mentoring and Coaching is serving, or on other staff or volunteers. An examination of the circumstances and events leading to an offence will be considered, as will repeat offences and the time since an offence took place. Careful attention will be given to relevant references and advice sought from appropriate agencies, taking into account the requirements outlined below. When there is an offence relating to children, young people or adults at risk of harm, or there is a known or suspected risk, Steps: Mentoring and Coaching will undertake a risk assessment (*please refer to appendix A for a sample risk assessment*) and agree appropriate action to mitigate any risks. For existing workers, this may involve removing the person from the relevant activity, either temporarily or permanently. Alternatively, Steps: Mentoring and Coaching reserves the right to supervise the individual concerned, if any known risk is assessed as manageable and will set boundaries for that person, which they will be expected to keep. This may involve the use of behavioural supervision agreements. Whatever action is taken, appropriate pastoral care will also be offered.

c) Requirements

Information contained in a Disclosure or obtained from an individual about a criminal record will be treated in strict confidence and on a need-to-know basis in accordance with The Disclosure and Barring Service code of practice and GDPR. Disclosures from applicants for a role will be kept securely retained for no longer than six months from the date they were received, and disposed of securely. Information on spent convictions will be asked only of those who are applying for work which allows exempted questions under the Rehabilitation of Offenders Act. Applicants who wish to submit confidential information concerning any criminal convictions will be encouraged to do so separately from the application form, sent to the Chair of trustees or other nominated person.

d) Decision

The decision to employ someone with a criminal record is the legal responsibility of the trustees. Consideration should be given to any and all possible risks and how these can be minimalised or excluded, including:

- *The length of time since the conviction*
- *The severity and nature of the offence(s)*
- *Whether there was a repetition of offences*

- *All and any potential risks*
- *Evidence of rehabilitation*

In taking such decisions, advice should be sought from the national Steps: Mentoring and Coaching Safeguarding Officer and Thirtyone:eight.

3. Training and Supervision

Training

Steps: Mentoring and Coaching is committed to on-going safeguarding training for all workers, including trustees; developing a culture of awareness of safeguarding to help protect everyone. All workers should receive safeguarding training during their induction period. This will be updated every 2/3 years. Workers involved in recruitment and management will also receive appropriate training which includes safeguarding considerations. Appropriate evidence of training in safeguarding will be detailed to trustees annually as part of an annual cycle of review of policy and practice.

Supervision of Staff and Volunteers

Steps: Mentoring and Coaching commit to ensuring all staff and volunteers are appropriately line managed and/or supervised by a named individual who arranges regular meetings. This is critical to the cycle of review and to ongoing development in all areas, not just safeguarding. Part of the role of the line manager/supervisor is to ensure all training needs are met and that those they supervise have understood their responsibilities with regard to safeguarding and are able to manage any concerns or suspicions appropriately. The Line Manager/supervisor should also be aware of each worker's performance in their role and their approach to personal relationships with the children, young people and adults at risk of harm in their care. It is expected that each Line Manager/Supervisor will regularly observe the worker in their role. They should also keep a written record of supervision meetings and ensure any concerns or training needs are addressed. Evidence of training attended should be kept. Appropriate evidence should be presented to trustees as part of an annual cycle of review which demonstrates good working practice in this area.

4. Whistleblowing

For more information see Steps: Mentoring and Coaching Whistleblowing Policy

In addition to effective management of allegations against staff, there is a mechanism in place for staff and volunteers to report legitimate concerns (e.g. improper actions or omissions) about other workers. This is known as 'whistleblowing'. The reporting principles of which are contained in the Public Disclosure Act 1998 which gives legal protection to workers against being dismissed or penalised as a result of disclosing certain legitimate concerns. The policy is designed so that workers can report safeguarding or other concerns internally and at a high level. It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The worker has no responsibility for investigating the matter - it is Steps: Mentoring and Coaching responsibility to ensure that an investigation takes place.

Individuals are encouraged to put their name to any disclosures they make. Concerns reported anonymously are less credible but will still be considered at the discretion of Steps: Mentoring and Coaching. If told not to raise concerns or pursue wrongdoing, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter to their line manager, supervisor or designated trustee. Steps: Mentoring and Coaching upholds the importance of creating and working in a culture which encourages individuals to feel safe, open and transparent.

There may also be occasions when a worker has a personal difficulty which they know to be impinging on their professional competence. Workers have a responsibility to discuss each situation with their line

manager or supervisor so professional or personal support can be offered. Confidentiality cannot be guaranteed where personal difficulties or concerns about the welfare and safety of children, young people or vulnerable adults are involved.

5. International Ministry

Safeguarding the vulnerable is no less important overseas than at home in the UK. This safeguarding policy still applies to all work undertaken overseas and also to international visitors attending ministry activities in the UK. Whilst different cultures and countries may adopt different standards to the care and treatment of children, young people and adults at risk of harm, the standards and principles outlined in this policy apply to international ministry contexts.

All International Ministry work undertaken on behalf of Steps: Mentoring and Coaching will have a designated Safeguarding Officer responsible for implementing the safeguarding policy and for ensuring safer recruitment practice (including disclosures for UK citizens). Due account must always be taken of the laws and frameworks in place within any country in which our activities operate. All incidents, allegations or concerns must be reported to the Safeguarding Officer who will then liaise with the appropriate authorities to ensure good practice is facilitated in relation to the reporting of any allegations of abuse in line with this policy.

6. Pastoral Care – supporting those affected by abuse

Steps: Mentoring and Coaching is committed to offering pastoral care to all those affected by abuse. This may be young people or those working within the organisation as employees, volunteers or trustees who have been personally affected by abuse in the past or have been involved in dealing with abuse in some form as part of their current role. In offering pastoral care, we seek to work with each individual to provide the most appropriate support, working with an individual's home church if applicable and any local contacts, including relevant statutory agencies.

Support may be provided in a variety of ways including through personal contacts, local clergy or other church connections, pastoral care teams, through counselling agencies, specific Safeguarding services or any other possibilities. The main aim is to ensure that no-one feels isolated because of their experiences, and no one is left to deal with difficult feelings or stress because of the safeguarding aspects of their role within Steps: Mentoring and Coaching.

7. Categories of Abuse

Abuse is any form of maltreatment of a child, young person or vulnerable adult and includes somebody inflicting harm or failing to act to prevent harm. Abuse may take place in any context; a family setting, an institution or a community setting and may involve someone known to the child or may involve a stranger. Abuse may be perpetrated by an individual or by a group and may be by an adult or by another child or children.

1) Statutory Definitions

Although the statutory definitions of abuse vary slightly in England, Scotland and Wales, the following are broad definitions on which we base this policy. *(Please refer to Appendix B for further information on specific categories of abuse)*

Physical abuse is the causing of physical harm to a child or young person. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child they are looking after.

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and continuous adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexting is another form of sexual abuse and refers to the sending of sexually explicit messages or images usually between mobile phones. Sexting is now a criminal offence. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment.
- tend to a child's basic emotional needs.

2) Abuse and Additional Needs

Additional needs covers a wide range of disabilities and impairments, including but not limited to moderate, severe, profound and multiple learning disabilities; physical or visual impairments; deafness; autism and autistic spectrum needs, physical or mental health needs; speech, language and communication needs and behavioural, emotional and social development needs. This range of needs have a different impact on each individual child and their experience of disabling barriers. Any one child's experience of their impairment will be unique to them.

Research consistently shows that disabled children and young people are more likely to experience abuse (NSPCC 2018) and specifically more likely to experience multiple kinds of abuse and multiple episodes of abuse. The increased risk applies to disabled children in all impairment groups and all forms of abuse.

One of the factors that places disabled children at higher risk is that they may have less access to services and support which would otherwise protect them. Consideration needs to be given of any barriers to communication and sense of isolation they may have, either as a result of their needs or as a consequence of our own attitudes or assumptions. Consideration needs to be given to appropriate training for all

workers engaging with children and young people with additional needs to ensure there are no ongoing skills gaps or any lack of awareness.

In implementing this policy and our safeguarding procedures, Steps: Mentoring and Coaching seeks to ensure that specific consideration is given to those with additional needs and to ensuring that our services and safeguarding support is accessible in ways appropriate to all, regardless of any disability or impairment. Consideration should also be taken to children with sensory needs such as hearing or visual impairment.

3) Specific Contexts

Children affected by gang activity

Such children may be at risk of violent crime and are therefore considered vulnerable. Risks include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs. Other risks include increased likelihood of involvement in knife crime, dangerous dogs, sexual violence and substance misuse.

Self-harm (e.g. overdoses, cutting, misuse of drugs or alcohol).

Local Safeguarding Children Boards vary in their approach to deliberate self-harm. It will always be appropriate to discuss such a case with Thirtyone:eight and the local authority children's social care. Help can also be obtained from child and adolescent mental health services (CAMHS), through the general practitioner (GP) and, sometimes, from direct access counselling services.

Domestic Abuse

Domestic violence is the abuse of adults within a household. It may involve coercion and control, it need not involve physical assault to count as violence, and the adults concerned need not be married or of opposite sexes. If there are children in the household they are witnesses to the abuse and then they are considered to be emotionally abused, whether or not they are in the same room.

Parents who are adults at risk of harm

It is not uncommon for the parents of children who are abused or neglected to be themselves adults at risk of harm. Particularly common are problems of mental ill-health, domestic abuse and substance abuse (i.e. drugs and alcohol), often in combination. Where someone with such a difficulty is known to be a parent with a child living with them, a referral to the local authority children's social care service may be required.

Female genital mutilation

This is a Criminal offence under UK Law, and any suggestion that it is being sought or has been carried out should be referred using the process outlined in this policy.

Child trafficking

Child trafficking is transporting children across national borders, sometimes without proper immigration arrangements, for a variety of illegal purposes which can include domestic service, illegal adoption, organ harvesting, benefit claims or prostitution. Such children may speak little English. The police should be contacted immediately if a member of staff or volunteer comes across such a child.

Sexual exploitation and Prostitution

Children can be exploited by being given rewards in return for sexual activities. Internet and other media technology may be used in the abuse. Violence, coercion and intimidation are common. Regardless of the challenging behaviours they may display, exploited children should be viewed as victims of child sexual abuse, not as criminals.

Forced marriage and honour-based violence

Disclosures of actual or possible forced marriage should not be treated as simply a family matter or be disclosed to other family members but should be referred to the relevant statutory agencies.

Complex (organized or multiple) abuse

This is abuse which involves one or more abusers and a number of children. The abusers may be acting in concert, or in isolation, or may be using an institutional framework or position of authority to abuse children. The internet may also be used.

Bullying

Bullying is another way in which individuals abuse others, and it can be verbal or physical. Bullying includes teasing, making unkind comments about a person, demanding money, "ganging up" on an individual or physically assaulting a person. You might see evidence of torn clothes, bruising, burns, or scratches. A person might be afraid to attend school or other activities if they think the bully will be present.

PART TWO Best Practice Guidelines

Introduction

The following provides specific guidance about expectations for those who work as staff and volunteers for Steps: Mentoring and Coaching nationally and locally with children and young people. The over-riding principle of working safely in this context is that workers should take every opportunity that is reasonable to ensure that their actions do not cause harm, or fail to prevent harm, or provide opportunity for misunderstanding, misinterpretation or unnecessary allegations to be made. In doing so, the following guidance should be followed.

(Note: 'Workers' refers to all those who work with and have contact with children, young people and adults at risk of harm through the activity of Steps: Mentoring and Coaching this includes staff, trustees and all volunteers.)

1. Position of Trust and Expected Behaviour

As a result of their role, all those working with children, young people and adults at risk of harm are in 'positions of trust' in relation to those in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. Workers should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others.

It is unacceptable for those in a position of trust to engage in any behaviour which might allow a sexual relationship to develop with a child, young person or adults at risk of harm for as long as the relationship of trust continues. This can be achieved by staff and volunteers respecting boundaries and privacy of those being cared for, knowing how to deal with issues of discipline appropriately and developing an awareness of issues related to equality, inclusion and additional needs. Any incident, behaviour or attitude that has potential to be misinterpreted or which could lead to a breach of trust should be reported at the earliest opportunity.

All workers have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of

personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work. There may be times when a worker's behaviour, or actions in their personal life, come under scrutiny because their behaviour is considered to compromise their position or indicate an unsuitability to work with children or young people. The behaviour of a worker's partner or other family member may lead to similar concerns and require careful consideration by an employer as to whether there may be a potential risk to children and young people in the workplace.

2. Record Keeping and Data Protection

Workers may have access to personal or sensitive information about children and young people in order to undertake their responsibilities. These details must be kept confidential at all times and only shared when it is in the interests of the child to do so. Such information must not be used to intimidate, humiliate, or embarrass the child or young person concerned. If a worker is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from their manager or Safeguarding Officer. Any actions should be in line with the Steps: Mentoring and Coaching Data Protection Policy. Trustees should provide clear advice to staff and volunteers about their responsibilities under this legislation. Whilst workers need to be aware of the need to listen to and support children and young people, they must also understand the importance of not promising to keep secrets. Neither should they request this of a child or young person under any circumstances.

Records of contact with children, young people and adults at risk of harm will be kept for every activity in accordance with the Data Retention Policy of the organisation. The record should cover the number of children, young people and adults at risk of harm in attendance; the activities done or the issues covered in conversation; and any unusual events (e.g. fire alarms, unexpected guests, behaviour incidents). These records safeguard children, young people and adults at risk of harm and also all workers.

Every child, young person, adult at risk of harm, parent or carer should be able to view what is recorded about them. This information will be kept in a way that does not breach the confidentiality of an individual. Whilst it is important to observe data protection requirements, safeguarding is always the priority. Information about the prevention and detection of crime is exempt from Data Protection requirements. It may, therefore, be inappropriate to release information to a parent that has been disclosed by a child, young people or adults at risk of harm, without first consulting the statutory agencies.

Information of a sensitive nature (e.g. a child/ young person/ adult at risk of harm disclosing abuse) will need to be kept separately in a secure place and recorded using a report form. (samples available from Steps: Mentoring and Coaching or Thirtyone:eight) However, a cross reference could be recorded along the lines of "Jenny spoke to Bill tonight - see separate note in her file".

For further information around record keeping and data protection please refer to the Data Protection Policy available from Steps: Mentoring and Coaching and the Data Retention Policy of the organisation.

3. Social Contact

Social contact and communication between workers and children, young people or adults at risk of harm, in whatever form, should take place within clear and explicit professional boundaries.

Workers should not request or respond to personal information from a child or young person, other than that which is appropriate as part of their professional role. Workers should ensure that all communications are transparent and open to scrutiny and should also be clear in their approach to communication, so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details (including e-mail, home or mobile telephone numbers) to any child, young person or adults at risk of harm, unless the need to do so is agreed in

advance with their management and parents/carers. Communications outside agreed protocols may lead to disciplinary and/or criminal investigations.

Where social contact is an integral part of work duties, care should be taken to maintain appropriate personal and professional boundaries. This also applies to social contacts made through interests outside of work or through the worker's own family or personal networks. All contacts established or continued with children, young people or adults at risk of harm outside of the normal work environment should be open and transparent, with appropriate caution for safe working practices being adopted.

This means that workers should:

- *ensure that all contact with children, young people or adults at risk of harm is transparent and open to scrutiny and therefore have no secret contact or private communication*
- *consider the appropriateness of all their contacts and communication, according to their role and nature of their work*
- *maintain appropriate levels of accountability in relation to their contact with children, young people and adults at risk of harm and advise management of any social contact they have which may give rise to concern*
- *report and record any situation, which may place anyone at risk or which may compromise the organisation or their own role or standing*

4. Appropriate Relationships

a.) Gifts, Rewards and Favouritism

It is acknowledged that there are specific occasions when workers may wish to give a child or young person a personal gift. The giving of gifts or rewards to children, young people or adults at risk of harm should be part of an agreed plan for supporting positive behaviour or recognising particular achievements. Workers need to be aware that the giving of gifts can be misinterpreted by others as a gesture either to bribe or 'groom' a young person. Adults should exercise care when selecting children and/or young people for specific activities or privileges to avoid perceptions of favouritism or unfairness. Care should also be taken to ensure that workers do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment. There are occasions when children, young people or parents wish to pass small tokens of appreciation and this is acceptable. However, it is unacceptable to receive gifts on a regular basis of any significant value.

b.) Infatuations

Occasionally, a child, young person or adults at risk of harm may develop an infatuation with someone who works with them. Workers should deal with such situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach and they are transparent and accountable. A worker who becomes aware that a child or young person is developing an infatuation should discuss this at the earliest opportunity with a manager so that appropriate action can be taken to avoid any hurt, distress, misunderstanding or embarrassment. Such concerns should be reported and recorded with an agreed plan of action implemented to ensure professional boundaries are maintained.

c.) Sexual Contact and Relationships

All workers should clearly understand the need to maintain appropriate boundaries in their work with children and young people. Intimate or sexual relationships between workers and children or young people will be regarded as a grave breach of trust and a matter of gross misconduct. This includes contexts in which the worker and the young person are close in age. Allowing or encouraging a relationship to develop

in a way which might lead to a sexual relationship is always unacceptable, due to the breach of trust and the nature of the worker's position of power. Any sexual activity between an adult and a young person under the age of consent is also a criminal offence.

This means that workers should NOT:

- *have any form of intimate relationship with a child, young person or adults at risk of harm*
- *have any form of communication with a child/young person or adults at risk of harm in their care which could be interpreted as sexually suggestive or provocative*
- *make sexual remarks to, or about a child/young person or adults at risk of harm*
- *discuss their own sexual relationships with or in the presence of children/young people or adults at risk of harm*

5. Physical Contact

Not all children and young people feel comfortable about physical contact. Permission should be sought from a child or young person before physical contact is made. Where the child is very young, there should be a discussion with the parent or carer about what physical contact is acceptable and/or necessary.

a.) General Principles

When physical contact is made with a child, this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. However, physical contact should never be secretive, or for the gratification of an adult, or represent a misuse of authority. If a worker believes that their action could be misinterpreted, or if an action is observed by another as being inappropriate or possibly abusive, the incident and circumstances should be reported to the manager as outlined in the Safeguarding Policy and parents/carers should also be informed in such circumstances. Workers should always be prepared to report or explain their actions and accept that physical contact will be open to scrutiny.

Where a child seeks or initiates inappropriate physical contact with an adult, the situation should be handled sensitively and care taken to ensure that contact is not exploited in any way. Careful consideration must be given to the needs of the child and advice and support given to the worker concerned.

b.) Activities that may require Physical Contact

In some contexts, workers will have to initiate some physical contact with children, for example in sporting, drama or other physical activities. This may be to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support a child so they can perform an activity safely or prevent injury. Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. Contact should be relevant to their age or understanding and workers should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

This means that workers should:

- *Have an approved plan for any regular activities involving possible physical contact*
- *Treat children with dignity and respect and avoid contact with intimate parts of the body*
- *Always explain the reason why contact is necessary and what form that contact will take*
- *Seek consent of parents where a child or young person is unable to do so because of a disability*
- *Consider alternatives, where it is anticipated that a child might misinterpret any such contact*

- *Be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact*

c.) Managing Challenging Physical Behaviour

All children and young people have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour. Workers should not use any form of degrading treatment to punish a child. The use of corporal punishment is not acceptable and whilst there may be a legal defence for parents who physically chastise their children, this does not extend, in any circumstances, to other adults who work with children and young people.

Where children display difficult or challenging behaviour, workers must follow an agreed plan of work, and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed. Where a child has specific needs in respect of particularly challenging behaviour, a positive handling plan may be drawn up and agreed by all parties. The use of physical intervention should only be used to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances. When used it should be undertaken in such a way that maintains the safety and dignity of all concerned. The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled and the nature of the harm they may cause. The minimum necessary force should be used and the incident and subsequent actions should be documented and reported. The parents/carers should be informed as soon as possible.

This means that workers should:

- *try to defuse situations before they escalate*
- *inform and agree with parents any behaviour management techniques used*
- *be mindful of factors which may impact upon behaviour e.g. bullying, abuse*
- *always use minimum force for the shortest period necessary*
- *record and report as soon as possible any incident where physical intervention has been used*
- *ensure they have appropriate training to handle challenging behaviour*

A recommended guidance on safe ratios whilst working with children over the age of 8 years old is 1 adult to be present to every 10 children.

d.) Children and Young People in Distress

There are some contexts in which workers will need to manage occurrences of distress and emotional upset. When a distressed person needs comfort and reassurance, this may involve appropriate physical contact. Young children in particular may need immediate physical comfort, for example after a fall, separation from parent etc. Adults should use their judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries.

This means the worker should:

- *consider the way in which they offer comfort to a distressed child in an age-appropriate way*
- *be circumspect in offering reassurance in unsupervised or one-to-one situations, but always record such actions*
- *not assume that all children seek physical comfort if they are distressed*

e.) First Aid

It is expected that there should always be at least one worker present who is trained in basic first aid techniques. When administering first aid, workers should ensure that another adult is aware of the action being taken. Parents should always be informed when first aid has been administered. .

6. Lone working and working 'One-to-One'

There are some contexts in which it is appropriate to work with a young person alone, such as mentoring or pastoral contexts. Due to the nature of this context, it is vital to have clear procedures and agreements in place. 'One-to-one' situations have the potential to make a child/young person more vulnerable to harm by those who seek to exploit their position of trust. Those working in 'one-to-one' settings with children and young people may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one to one situations are unavoidable, reasonable and sensible precautions are taken.

Workers should consider the safest and most appropriate venue for meeting one-to-one and how to make this space the safest it can be, whether online or in person. There should be a written agreement, which may include email correspondence, in place which outlines the expected setting and purpose of the work. This should include the worker and young person outlining expectations, and could also include the agreement of their parent/carer, school or church, social worker or other professional contact. There are occasions where workers will need to undertake a risk assessment in relation to the specific nature and implications of 'one-to-one' work. These assessments should take into account the individual needs of the child/young person and the individual worker and any arrangements should be reviewed on a regular basis. Meetings with children and young people outside regular agreed working arrangements should not take place without prior agreement of managers and parents or carers. Workers should be aware of the need to be transparent and accountable in all their work and the particular risks of working alone with a young person.

7. Transporting Children and Young People

Under normal circumstances, staff and volunteers should not transport any child or young person. However, this may be necessary in an emergency. In these circumstances, workers should do their utmost to spend the least amount of time alone in a car with a young person. This emergency must be recorded and reported to a manager and parents/carers.

It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the staff member to ensure that this requirement is met. Workers should also be aware of current legislation and adhere to the use of car seats for younger children. Where workers transport children in a vehicle which requires a specialist licence/insurance, they should ensure that they have an appropriate licence and insurance to drive such a vehicle. A child or a young person should always be seated in the back seats of the car and never in the front passenger seats for good practice.

It is inappropriate for workers to offer lifts to a child or young person.

8. Praying

The following guidance provides additional considerations when praying with or for a child/young person/ adult at risk of harm, which may be relevant to a range of contexts, including one-to-one meetings.

- *Always talk and pray with someone in a group of more than two if possible. Otherwise the guidance for one-to-one meetings should be followed as usual practice.*

- *Prayer should be offered by someone of the same biological gender as the young person, if possible. However, consideration should be given where a young person approaches a leader of a different gender to ask for prayer and this should be handled sensitively. For example, by suggesting another leader of the same gender or where appropriate to the relationship this can be accommodated as safely as possible, for example, by inviting another leader to join or simply ensuring transparency and accountability. These considerations also apply to those with non- binary gender identification.*
- *Whilst it is understandable to want privacy when praying, it should usually take place in an open space or a public venue. Where this is not possible or the context is already in a one-to-one context or more private setting such as an office or classroom, then the worker must ensure all efforts for transparency and accountability have been made.*
- *Whilst confidentiality is important, as in any context, there should be no promise of confidentiality.*
- *When praying for someone, the worker should not initiate a physical touch. If appropriate, they could ask if it is OK to touch an arm or shoulder, but this should not be assumed and any touch should be primarily to offer comfort. A hug initiated by a child or young person can be reciprocated appropriately in response to their distress or for comfort.*

9. Working in Partnership

The diverse nature of the organisation and settings in which Steps: Mentoring and Coaching works means there can be great variation in practice when it comes to safeguarding children, young people and adults at risk of harm. This can be because of cultural tradition, belief and religious practice or understanding, for example, of what constitutes abuse.

We therefore have clear guidelines in regards to our expectations of those with whom we work in partnership, whether in the UK or not. We will discuss with all partners our safeguarding expectations to ensure that the partner organisation has a safeguarding policy and that it is compatible with the Steps: Mentoring and Coaching safeguarding policy.

Good communication is essential in promoting safeguarding, both to those we wish to protect, to everyone involved in working with children, young people and adults at risk of harm and to all those with whom we work in partnership.

Policy End

Appendix A:

A. Sample Risk Assessment

{PLEASE INSERT EVENT NAME}

KEY:

L = Likelihood of occurrence (marked out of 5)

I = Impact of consequences (marked out of 5)

T = Total risk consideration (Max total 25 – marks 15 and above to be considered high risk)

Signed: _____

Date: _____

Signed off by Competent Person: _____

Potential Risk	Steps to Mitigate Risk	Planned Action	Assessment of:			Person Responsible	Date Completed
			L	I	T		

Appendix B: Categories of Abuse - Specific Contexts

In addition to understanding the statutory categories and forms of abuse, it is helpful for those who work with children and young people to have an awareness of the following specific contexts:

Self-harm can take a number of forms, including but not limited to overdoses, cutting and the misuse of drugs or alcohol. Local Safeguarding Children Boards vary in their approach to deliberate self-harm, as some will see it as part of a wider mental health issue and not in itself a form of abuse whilst others will look at the motivating factors to establish whether there is any underlying abusive cause or whether this amounts to self-abuse. It is appropriate to discuss incidents of self-harm with Thirtyone:eight and the local authority children's social care team. Further advice can also be obtained from child and adolescent mental health services (CAMHS), a local general practitioner (GP) and, sometimes, from direct access counselling services.

Children affected by gang activity may be at risk of violent crime and are therefore considered vulnerable. Risks include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs. Other risks include increased likelihood of involvement in knife crime, dangerous dogs, sexual violence and substance misuse.

Domestic Abuse (including Coercion and Control) is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members, regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial or emotional abuse. If there are children in the household, they are witnesses to the abuse and then they are also considered to be emotionally abused, whether or not they are in the same room as any threatening behaviour:

- Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (see below) and forced marriage (see below), and it is clear that victims are not confined to one gender or ethnic group.

Female genital mutilation (FGM) is the ritual cutting or removal of all or some of the external female genitalia. It is a criminal offence in Britain and any suggestion that it is being sought or has been carried out should be referred using the process outlined in this policy.

Forced marriage and honour-based violence should not be treated as simply a family matter or as a private issue confined to a particular community, but should be referred to the relevant statutory agencies.

Child trafficking is transporting children across national borders, sometimes without proper immigration arrangements, for a variety of illegal purposes which can include domestic service, illegal adoption, organ harvesting, benefit claims or prostitution. Such children may speak little English. The police should be contacted immediately if a member of staff or volunteer comes across such a child.

Radicalisation in this context is the process by which a child, young person or vulnerable adult comes to support extremist ideologies which may be associated with terrorist groups, or other forms of fundamentalist teaching within faith groups which is deemed to have potential for abuse or risk from harm. Every local authority has a dedicated police officer or team to deal with concerns and to assess whether the criteria for intervention is met.

Child Sexual Exploitation (CSE) occurs where anyone under the age of 18 is persuaded, coerced or forced into sexual activity in exchange for, amongst other things, money, drugs, alcohol, gifts, affection or status. Consent is irrelevant, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and may occur online. Regardless of the challenging behaviours they may display, exploited children should be viewed as victims of child sexual abuse, not as criminals.

Complex (organized or multiple) abuse is that which involves one or more abusers and a number of children or young people. The abusers may be acting in concert, or in isolation, or may be using an institutional framework or position of authority to abuse children. The internet may also be used.

Bullying is another way in which individuals abuse others and it can be verbal, emotional or physical. Bullying includes teasing, making unkind comments about a child, demanding money, "ganging up" on a child or physically assaulting a child. You might see evidence of torn clothes, bruising, burns, or scratches. A child might be afraid to attend school or other activities if they think the bully will be present. Bullying is often seen as being part of natural 'playground' behaviour but is actually a form of abuse and should be treated as such.

Parents who are adults at risk of harm - it is not uncommon for the parents of children who are abused or neglected to be themselves adults at risk of harm. Particularly common are problems of mental ill-health, domestic abuse and substance abuse (i.e. drugs and alcohol), often in combination. Where someone with such a difficulty is known to be a parent with a child living with them, a referral to the local authority children's social care service is required.

Appendix C: Example Reporting Form

This form should be completed immediately after any incident in which concern is raised regarding safeguarding children, young people or vulnerable adults. This includes direct disclosures, observations and incidents during face-to-face work plus phone calls and other conversations with staff, volunteers or external parties.

Once completed, please email or hand directly to the relevant Safeguarding officer. If it is not possible to complete this form immediately, please ensure you make notes of the incident and contact a Safeguarding officer. Your original notes should then be given to the Safeguarding officer, as soon as possible, along with this form.

Your full name:

Your role:

Your phone number and email address:

Date and time of completing this form:

Date and time of the incident or report of concern:

Location:

(please state event venue or where the conversation took place, e.g. phone call received in the office.)

Name and contact details of person reporting concern, if not you:

Name and details of child, young person or adult to which this concern relates – please give as much information as possible regarding the subject(s) of this concern. *(Please give full name, age and address of any specific individuals, if known.)*

Please give details of the nature of the concern:

Notes:

If you have witnessed this incident directly, then please provide full details of your concern, giving as much detail as possible as to what was happening before and after the incident, who was involved, including others who may have witnessed the incident etc. Please comment on any action that was taken at the time, for example to ensure the immediate safety of a child or young person.

If you are giving details of a concern, following a phone call or conversation with someone else, please aim to use wording as close to the original concern as possible.

If you are raising a concern about a named adult, for example a member of staff, volunteer or other adult, please give details of the nature of your concern, their observed behaviour or precise details of your concern including dates and locations of any specific incidents.

Please use a separate sheet if necessary.

Safeguarding Officer Name:

Date form received and read:

Action taken following receipt of this form:

Appendix D: Example Photography Consent Form

Consent form for

(Name of organisation commissioning photography)

To: _____

Name of parent/carer* (*person with parental responsibility)

Name of child: _____

Church /Organisation/ Club child attends: _____

Location of photograph:

Church/Organisation (name) _____ would like to take
photograph(s)/make a video/webcam recording of
_____ (name of child/ren)

These images may appear in our printed publications, on our website, or both. (Delete/add as appropriate).

To comply with GDPR, permission must be granted by the parent/carer before any images of your child/children are taken and used. Please answer questions 1 and 2 below, then sign and date the form where shown. Please return the completed form to:

(Insert the name of the worker commissioning the photography and the return address.)

To the parent (Delete as appropriate)

1. May we use your child's image in our printed promotional publications? YES/NO

2. May we use your child's image on our website? YES/NO

Signed: (parent/adult with parental responsibility)

Date: ____/____/____

Youth/Children's Worker

3. I have checked which parents are happy for their child(ren)'s images to be used in the (churches/organisation's) _____ printed publications or on its website or both.
YES/NO

Please note that websites can be seen throughout the world, and not just in the United Kingdom, where UK law applies.

I have read and understood the conditions for using these images as detailed below.

Signed (Youth/Children's worker) _____

Date: ____/____/____

Print name: _____

Conditions of use

1. This form is valid for _____ (length of time in years) from the date of signing/ *for this project only. Your consent will automatically expire after this time.
2. We will not re-use any images *after this time/*after the project is completed.
3. We will not include details or full names (which means first name and surname) of any person in an image on website, or in printed publications, without good reason and only with your express consent.
4. We will not include personal e-mail or postal addresses, or telephone or fax numbers on our website or in printed publications.
5. We may use group images with very general labels, such as "youth enjoying sport" or "making Christmas decorations".
6. We will only use images of pupils who are suitably dressed; to reduce the risk of such images being used inappropriately e.g. we will not publish material from the youth group's swimming activity.

(*Please delete the option that does not apply.)

NB : This form can be adapted to include video if required.

Glossary

“Adult”	An adult is anyone over the age of 18 and is viewed as a mature, fully developed person. An adult is legally responsible for their actions. When a young person reaches the age of 18 the responsibility for their wellbeing may transfer to adult service providers.
“Child”	A child is anyone under the age of 18
“Adults at risk of harm”	Although they cease to be subject of the Safeguarding Children Procedures, some adults may continue to be vulnerable. An ‘Adult at Risk’ is defined as any person aged 18 years and over who is or may be, in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.
“Steps: Mentoring and Coaching”	The charity in which all work is carried out on behalf of.
“Worker”	In the context of this policy, anyone working for Steps: Mentoring and Coaching, either as an employed member of staff or in a voluntary capacity, including as a trustee.