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# PROMOTING SAFER PRACTICE FOR CHILDREN AND ADULTS AT RISK

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## Promoting Safer Practice for Children and Adults at Risk

### Introduction

The Church in Wales seeks to provide a safe, inclusive community for all who wish to take part in the life of the church and create an environment which helps them to grow spiritually and cares responsibly for them.

Through ministry and contact with children and adults at risk in many settings the Church in Wales has a particular responsibility to ensure that all people are treated with dignity and respect and to be alert to signs of abuse, neglect or poor care.

These good practice guidelines are designed for all members of the Church in Wales who have some responsibility for the pastoral care of others. It is intended to help the church community understand the needs of children and adults at risk to help improve pastoral care.

Anyone involved in any activity within the Church in Wales, where that activity brings them into contact with children and/or adults at risk should abide by these guidelines.

### Principles of Good Practice

All those working with children and adults at risk should:

- ensure they are familiar with the Church in Wales Safeguarding Policy and associated guidance
- treat each child or adult at risk with dignity and respect
- fulfil their duty of care by always acting in the best interests of children, adults at risk and others
- never force or coerce a child or adult at risk to participate in an activity
- set a positive example for others to follow
- not participate in pastoral care which is beyond their responsibility and/or competence
- encourage others to appropriately challenge attitudes or behaviour they do not like
- be respectful of diversity and seek to promote equality for all, regardless of age, disability, gender, race, ethnicity, cultural background, religion or belief, sexual orientation, or gender identity

Anyone working for the Church in Wales should empower children and adults at risk to

safeguard themselves by listening to them and accepting what they say and giving them choices and relevant advice and information (as befitting their age and understanding). Children and adults at risk should be involved in decisions that affect them as far practicable.

It is important not to make assumptions based on age or any other factor. For example, adults at risk should be asked if they are happy for their first name to be used or if they would prefer to be addressed using a title and surname.

Always be mindful of language, tone of voice, and body language. Positive and appropriate language should be used at all times and if necessary, advice should be sought when the person has specific communication needs.

Everyone should avoid comments which could be taken to have sexual overtones or be regarded as intimate and discourage discussion of a sexual nature. This principle should not prevent anyone from listening to a child or adult at risk in a situation where their distress is caused by physical or emotional concerns which have to be acknowledged in the interest of helping the child or adult at risk at that time. An adult working with children or adults at risk may need to listen to a child or adult at risk describing or explaining a personal problem and respond appropriately. The adult should not promise to be a confidante in such circumstances and must report any incident of concern to the activity leader or a safeguarding officer as soon as practicable. Adults should use their professional judgement to ensure that they are not drawn into areas of conversation inappropriate to their duties or their relationship to the child or adult at risk concerned. Adults should ensure that all topics of conversation with children are appropriate, bearing in mind the age and understanding of the child. The use of sarcastic, demeaning, or insensitive comments towards children or adults at risk is a form of abuse and must be avoided.

Where possible, never work alone with a child, adult at risk or a group. In church premises, this could mean leaving doors open, or arranging for two groups to undertake activities in the same room. This enables workers to support each other and remain accountable to each other as a team. Agree some basic guidelines for each activity so that everyone is behaving in a consistent way and expectations are clear. Make sure these are shared and understood by children and adults at risk, volunteers, new workers, parents, and carers.

Children and adults at risk should be afforded the highest level of respect for their privacy and confidentiality possible in the circumstances but promises to keep secrets should not be made. Workers should not enter into private or intimate conversations with children or adults at risk. Offering appropriate care and support is important so, in listening to a person's problem or offering advice, care should be taken in selecting an appropriate location and setting for such a discussion. Where possible, other leaders should be made aware of the meeting and other people should be around.

Physical contact with children or adults at risk should be used appropriately and with respect for personal boundaries. All physical contact should be related to the needs of the child or adult at risk and not for the benefit of the worker. Appropriate reasons for physical contact include:

- Administering First Aid
- Restraining a child or adult at risk to prevent them harming or injuring themselves or others or doing damage to property. Only reasonable and proportionate restraint

can be used.

- Comforting or providing reassurance to a child or adult at risk in distress. This should be done with the knowledge of, and preferably in the sight of, other adults.
- Sharing the peace at the Eucharist with a handshake.

Physical contact, where necessary and appropriate, should be kept as public as possible. Physical contact should be minimal, appropriate, and not prolonged or repeated. Adults should take into account the age and understanding of the child or adult at risk concerned and take care to avoid contact which may be wrongly interpreted. If any unusual physical contact occurs between an adult and a child or adult at risk, even accidentally, it is important that the adult reports the incident to the activity leader or safeguarding officer as soon as reasonably possible, no matter how embarrassing or trivial the incident may be.

Workers should be open and transparent and team members should monitor one another in the area of behaviour or physical contact. They should be free to help each other by offering support if it appears to be needed and by constructively challenging anything which could be misunderstood or misconstrued. Teams should be mindful of the safety of children and/or adults at risk at all times but also be mindful of the worker's safety to protect themselves from allegations. All behaviour should be open, transparent, and accountable. Everyone should be aware that however well-intentioned someone's actions are they may be misinterpreted by others.

Personal relationships should not develop between clergy, church officers or volunteers and children or adults at risk met through church activities. It is inappropriate for an adult to arrange or agree to meet with, or to prolong an accidental meeting with, a child or adult at risk outside the church environment. If adults foresee such an occasion developing, they should discuss it with the incumbent, priest in charge or activity leader.

When considering direct communications with children or adults at risk, whether by telephone, text message, e-mail, social media, letter or any other electronic or non-electronic means, the same principles should be applied as in person interactions. This would include another adult being included in all communications. Most often this will be a parent or carer. There may be circumstances, particularly with older teenagers and adults at risk, where it is felt more appropriate to include another safely recruited adult on the church leadership team rather than the parent/carer. The key is openness and transparency. Church in Wales personnel should not provide their personal contact information to children or adults at risk and should not accept requests for contact via social media. Persistent attempts by a child or adult at risk to engage with church personnel outside church activities should be discussed with the incumbent, priest in charge or activity leader, who if necessary, can seek further advice/guidance from the provincial safeguarding team.

Everyone working with children and/or adults at risk should be aware of the possibility of infatuations and crushes developing, particularly in the case of adolescent and older children. Workers should alert a colleague if they observe a child or adult at risk developing an infatuation which could put that colleague at risk. Workers should remain professional and not add to the child or adult's problems by joking about or providing any such situation. If the worker is concerned about a particular developing situation, they should talk with the activity leader about it. If a child or adult at risk should initiate an unacceptable physical or verbal approach, the adult concerned should gently but firmly disengage himself/herself and explain that such closeness is not appropriate or acceptable. However, they should be careful

not to react in such a way as to humiliate the child or adult at risk. If a child or adult at risk develops a tendency regularly to stay behind with a worker as if to help, or to discuss matters, the worker should act to avoid this situation developing, either by asking another child or adult at risk to help with the same task, inviting another worker into the room, or preventing the opportunity recurring.

Everyone should remember that an adult at risk is still an adult and must never be treated like a child. The choices that an individual makes should be recognised even if they appear risky, unless there is evidence that their mental capacity to make that decision is impaired.

Anyone working with adults at risk should be respectful when visiting the adult at home, taking care to knock before entering a building or a room and being conscious of the individual's privacy. Lone visits are discouraged. However, when lone visits are made, the reason for the visit must be agreed and recorded, the visitor should always inform someone else of their whereabouts and notify that person when the visit has been completed. Visits should not be undertaken at night unless it is an emergency.

Visits to the homes of children should be arranged with parents or carers, who should remain present during the visit. Avoid entering a child's home if a parent or carer is absent unless the child is at immediate risk of harm. Children should not be invited into the home of a cleric, church officer or volunteer unless accompanied by a parent or guardian.

It is important to ensure that the choices offered to individuals are fully understood by them and that help is provided in such a way as to maximize a person's independence. People with additional needs can and do lead active and fulfilled lives but some may need support and resources to do so. Respect their independence and do not encourage the person to become dependent on you.

Anyone working with adults at risk should decline to deal with an individual's financial affairs unless legally required to do so and managed within a formal framework.

People working on behalf of the Church in Wales should not accept material or financial gifts from or on behalf of a child or adult at risk.

Anyone working with children should learn how to control and discipline children without resorting to corporal punishment. **Never** smack or hit a child and do not shout. Discipline and control should be managed by changing voice tone, referring disciplinary issues with individual children to their parents or carers and asking for additional support if necessary. Everyone working with children should get to know them and find out what works for them as individuals and as a group. Workers should make age-appropriate group agreements (ground rules) with the children on what is acceptable behaviour (e.g., no hitting, shouting, name calling etc.), which can be reviewed regularly together. Abusive peer activities such as bullying must not be tolerated.

Everyone working with children and/or adults at risk should avoid situations within a relationship of trust which could compromise that relationship:

- never initiate or allow games or use of equipment which involves significant physical contact, or which could be seen as sexually provocative

- never make or allow suggestive sexual remarks, or banter, to, or about any individual and avoid being drawn into a situation which allows or encourages a child or adult at risk to seek attention in a manner that is sexual or overly physical
- seek advice and deal appropriately with attention seeking behaviour displayed by children or adults at risk, e.g., infatuations, crushes, or tantrums

Church in Wales staff and volunteers should not transport a child or adult at risk in a vehicle without a chaperone. Workers should ensure that another leader/helper accompanies them in the vehicle. If circumstances dictate that a child or adult at risk must be transported alone, other leaders/helpers must be made aware of what is happening, and the child or adult at risk must travel in the rear seat of the vehicle, using appropriate safety restraints and seat belts.

Everyone working with children and/or adults at risk should be aware of the risks associated with the use of mobile telephones and ensure that social media is used with care.

Clergy, staff and volunteers should never dismiss disclosures, allegations or concerns relating to abuse. It is important to take any disclosure, allegation, or concern about abuse seriously. Careful notes should be written of what is seen or heard and it should be reported straight away. Recognise, record, report.

Never be afraid to ask for help and take advice from leaders or more experienced staff.

Provincial Safeguarding Officers are available to give consultation and advice and should be contacted about all disclosures, allegations or concerns relating to abuse or harm.

## Positions of Trust

A person is in a position of trust if they have a role that gives them authority over others. They are expected to use that authority for the benefit of those for whom they are responsible and not to take advantage of or exploit them. Examples of Church in Wales roles that are regarded as “positions of trust” are listed below but please note this list is not exhaustive and there may be other roles which should/would be regarded as positions of trust that are not listed:

- clergy
- licensed lay ministers e.g. Readers
- worship leaders
- safeguarding officers
- child or youth leaders and workers
- leaders of Sunday Schools or parent & toddler groups)
- churchwardens
- music/choir leaders
- leaders of groups for adults who may be vulnerable e.g. elderly, adults with mental health issues, refugees, the homeless
- parish volunteer drivers – who drive vulnerable groups (children and/or vulnerable adults)

- tower captains and bell ringers who teach or train children or adults at risk
- lay people authorised to provide pastoral care – this will include pastoral home visitors, and pastoral outreach workers.

The above list suggests some of the ‘typical’ roles which would be defined as ‘positions of trust. However, it is important to remember that to visitors – and especially to children – almost any role within church conveys a level of trustworthiness and respectability. All those who are involved in church life must consider how they relate to others and, in particular, to those who are vulnerable, including in the context of the church.

Why is this important? All relationships in church should be characterised by generosity, care, and kindness. Particular care should be taken when that relationship involves a level of responsibility for or authority over others. That responsibility and authority must be exercised in a trustworthy way, acknowledging the power and influence that can be exerted, perhaps even inadvertently, over others. Thinking about power and influence and managing the risk of abuse of a position of trust is at the heart of safeguarding.

The relationship between a person in a position of trust in church and those they minister to is one of power or influence. The relationship is not between equals. Particular care must be exercised, meaning that those in positions of trust must:

- be aware of the power and influence they have and use it in ways that respect and empower others
- recognise that power and influence can act in subtle and even covert ways and are not just limited to more obviously domineering leadership styles
- maintain clear boundaries in relationships and avoid using their role to establish relationships of inappropriate intimacy or dependency with those for whom they have responsibility
- not use their power to abuse, exploit, bully, intimidate, coerce, or undermine

Someone seeking assistance may be distressed, sad, confused, or frightened, adding to their vulnerability. This makes it even more important that those responding to them are aware of their status and power. Relationships can become blurred, dependant or exploitative in such situations if boundaries are not maintained. This is all the more the case in church, where relationships may be less formal than other settings.

The Sexual Offences Act 2003 was amended in 2022 to extend the Position of Trust legislation to include those individuals who coach, teach, train, supervise or instruct in a sport or a religion

It is therefore now against the law for someone in a position of trust in a church context to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over).

Therefore, sexual activity between an adult and a child under the age of 18, when that adult is in a position of trust in a church setting, is a breach of that position and is against the law. It will be treated as a serious safeguarding concern and will be referred to the statutory authorities. If the adult in question is ordained, such a breach would lead to a complaint for action under the Church in Wales disciplinary tribunal.



## Considerations for Practice:

- Consider helpful age differences between those in our youth groups and those leading them
- Ensure all our leaders, including our young leaders are aware of Position of Trust laws BEFORE they commence in roles
- Be vigilant for any possible romantic relationships developing between young people and leaders in the church and have early conversations regarding any concerns
- Contact the safeguarding team to discuss any concerns.

## Participating in Activities

### Risk

The Church in Wales has a responsibility to assess the risk involved in the activities that are provided for children and adults at risk. A risk assessment template works as a checklist to make sure the potential problems and risks in an activity have been considered and helps to plan appropriate steps or actions. An informal check before the start of an activity may be sufficient but for organised group activities it is usually good practice to complete a written risk assessment. Please see the Church in Wales guidance document *Risk Assessment and Management* for detailed advice on how to assess and manage risk

If possible, each church-led group activity should include someone who has a recognised First Aid qualification.

### Consent

Consent should be obtained before children or adults at risk participate in activities.

Consent from an adult with parental responsibility for a child must be obtained before the child takes part in an activity. Parental responsibility refers to a parent of child or someone who has a court order to hold the legal responsibility of a parent.

The *General Consent Form* should be completed by the adult with parental responsibility. This form should provide emergency contact information, permission to seek medical help in an emergency and details of any allergies or reactions to certain foods. Where this consent is being used for an on-going group or activity then the form should be renewed annually and updated when any change occurs.

Additional consent (*Consent for Specific Activities*) should be obtained in relation to any activity which is over and above the regular activities. This could be an occasional 'high risk' activity; for example, climbing, or a trip or residential course.

Such activities will also require formal approval using *Application for Approval of Activities*.

The use of electronic communication or social media (such as websites and applications that enable users to create shared content or participate in social interaction) with children requires written permission from someone with parental responsibility for the child (*Consent*

*Form for Electronic Communication with Children*).

A register of attendance (*Session Record*) at the club or activity should be maintained, together with a register of workers and volunteers at each session. Parents and carers should be kept informed of the nature of activities.

Consent forms and registers of attendance must be stored securely in accordance with data protection and record-keeping policies and procedures.

The consent of an individual adult at risk should be sought before undertaking activities with them. This will usually be verbal consent, although written consent might be appropriate for some activities that create particular risk. Special care must be taken in circumstances where an adult at risk has impaired mental capacity, although in many cases an adult with impaired capacity will be able to indicate their consent to participate in an activity if information is presented in a way that they can understand. Specialist advice should be sought before an adult who is unable to provide consent participates in any activity and adults involved in their care and support should be involved in the decision.

## Supervision of children

The ratios below are those that are required by the Church in Wales and are in line with the recommended standards issued for day care by the Welsh Government.

- 1 adult to 3 children from birth to 2nd birthday
- 1 adult to 4 children aged 2 years
- 1 adult to 8 children aged 3-7 years.
- 1 adult to 10 children aged 8-12 years.

The above are the minimum requirements, and the ratios should be increased where circumstances require; for example, to offer appropriate support to a child with additional needs. Whenever possible, all activities should be supervised by a minimum of two adults. During the supervision period children should never be left unattended.

The Church in Wales needs to follow the advice from the Care Inspectorate Wales as a minimum but would recommend that in keeping with promoting safer practice there should be 2 adults to every 10 children in all church related activities and events.

## Children under five years

Children under five years of age should always be accompanied by a parent or carer, particularly if the activity is taking place outside of church premises. With regard to Sunday School, where a child is under the age of five an assessment should be made as to whether the child can be in the group on their own and only if the Sunday School supervisor has agreed. In addition, the parent or carer of that child should be available and on church premises throughout the session.

## Transport

For information on who may legally drive a minibus refer to information provided by the Government on <https://www.gov.uk/driving-a-minibus>

Where transport is being provided the following good practice guidelines should be followed:

- there must be adequate comprehensive insurance in place that covers the driver for church activities. Drivers must check with their insurance company that their policy covers business use to ensure cover whilst driving during the course of their working activities.
- the vehicle must be road worthy. It is the driver's responsibility to make sure that the vehicle is in a roadworthy condition before use. Failure to do so may result in the driver being legally liable in the event of any accident.
- a seat belt must be available and must be used for every individual in the vehicle. It is recommended that the driver endeavors to ensure that seat belts are worn for any journey, no matter how short.
- the total number of children and adults in the vehicle must not exceed the passenger limit.
- if the minibus is owned by the church, all drivers must be named on the insurance policy.
- when hiring a minibus or larger bus, it is the responsibility of the user group to verify the legality and insurance cover of the operator prior to the use of the vehicle. If there is any doubt about this then sight of a copy of the operator's insurance cover and operator's license should be requested. **If in doubt do not drive the vehicle.**
- An accident report book/breakdown logbook should be carried in church minibuses and kept up to date.
- the maximum speed limits for a minibus should never be exceeded: 50mph on single carriageway roads, 60mph on dual carriageway roads, and 70mph on motorways.
- A first aid kit and fire extinguisher must be carried on the vehicle and the driver should be familiar with them.

## Transporting children

Children people should not be transported without the prior consent of their parents or guardians using *General Consent Form*.

Where drivers are transporting children, they must comply with safer recruitment procedures. A criminal record check must be completed, they must be aged over twenty-five, have held a full driving license for over two years and if driving a minibus then checks should be made to confirm that the license entitles the driver to drive a minibus.

Drivers with more than six points on their license must inform the Ministry/Mission Area Safeguarding Officer and any driver with a conviction for drink driving, dangerous driving or racing on the highway or similar must not transport children unless this has been considered by the Provincial Safeguarding Panel.

Do not transport a child alone. Ensure that a child is always accompanied by another adult. In

exceptional circumstances when it cannot be avoided, it is essential to make sure that other leaders/helpers are made aware of what is happening, and that the child is seated in the rear of the vehicle.

Leaders/helpers who accompany children in minibuses should sit amongst the young people and ideally a leader/helper should sit near vehicle exit points.

If parents make private arrangements to give lifts to children other than their own it must be made clear that such arrangement is between the lift provider and the child's parents or carers and is not an arrangement endorsed or facilitated by church workers.

### Child restraints and seatbelts

1. Children under 3 years must use the child restraint appropriate for their weight in any vehicle (including vans and other goods vehicles). The only exception to this is in the rear of a taxi where the correct child restraint is not available.
2. Rear-facing baby seats must not be used in a seat protected by a frontal airbag unless the airbag has been deactivated manually or automatically.
3. In vehicles where seat belts are fitted, children 3 years to 135cms in height (4ft 5ins) must use appropriate child restraint unless this is not available in a taxi, for occasional journeys over short distances and where two occupied child seats in the rear prevent the fitment of a third child seat. In these cases, the child may ride in the rear using an adult belt.
4. Children from 3 years to 135cm in height (or 12th birthday whichever they reach first) must use correct booster seat (same exemptions as above).
5. Children aged 12 or 13, or over 135cm in height a seat belt must be worn if fitted.

### First Aid

It is recommended that at least one of the leaders in a group for children or adults at risk attends a recognised First Aid course, such as one-day Emergency First Aid Training.

A first aid kit should be available in premises and on outings and trips. Kits should be easy to access – for example, if the church hall is a separate building from the church itself, it will make sense to have a first aid kit in each building. There is no formal standard regarding what first aid kits should contain, but excellent advice is available from St John's Ambulance and the Health and Safety Executive.

When administering first aid, record what led up to the treatment, what treatment was administered, and who was present. Use an accident book to record this. If the activity leader is not present, they should be made aware of what happened as soon as possible, and should countersign the accident log and make any comment that is necessary.

More serious incidents will need separate fuller reports by those involved and the group leader. It is possible that these reports may need to be provided to the Ministry or Mission Area Leader, insurers, or another relevant body.

Inform the parent(s) or carer(s) promptly in the event of an accident to a child or adult at risk, including details of any first aid administered. In the case of a slight injury, the parent or carer should be told when the child or adult at risk is collected or informed soon after the activity.

## Medication

Parents of children who require medication will usually make you aware of these needs and expect you to follow the medication plan they set. Details should be included in the registration form. No medicines should be given to children without the permission of parents or carers. Additionally, children over thirteen-years-old need to consent to being given medication. With adults who lack the ability to administer medication themselves, you should follow the plan agreed by their carer(s).

Depending upon the age and understanding of the child or adult at risk, they should be encouraged to self-administer medication or treatment. Again, details of this should be discussed with parents and carers.

## Fire Safety

Fire safety is a vital topic which impacts upon safeguarding, general safety in church, and building-management. It is covered in detail in Ecclesiastical Insurance's document *Church: Fire Risk Assessment*. Churches should print out and carefully follow the advice in this document or one provided by a different insurer if applicable.

## Filming and taking photographs

Taking photographs of, or filming children or adults at risk is often a good way to record a positive event or advertise a club but certain protocols must be followed to comply with the Data Protection Act 2018 as well as to safeguard children and/or adults at risk. This includes control over the making, saving, storing, using and publishing of images, photographs, film and sound, images on social network sites and video sharing. This is to protect children and adults at risk who may be at risk of abuse or exploitation through the inappropriate use of such images. It is good practice that where possible an announcement is made at the start of Church events/activities reminding all attendees to be mindful of the photographic and privacy rights of others.

There are many positive attributes to sharing digital images. However, it may also cause direct or indirect risks such as cyber bullying, usage by sexual predators, usage for grooming and the exposure of children and adults at risk to unsuitable and inappropriate material. There may also be instances whereby there are good reasons for the refusal of a parent or carer for images to be taken or used. Reasons for refusal may be because the parent or carer has decided they do not wish images to be taken or a child may be the subject of a legal dispute or in authority care where their whereabouts must not be widely known. There is no requirement for a parent or carer to disclose why permission has been refused.

## Data protection

Photographs, digital images, and film (images) are all classed as personal data and as such are subject to the Data Protection Act 2018.

The act contains eight Data Protection principles which need to be followed. Photographs, digital images, and film (images) must be:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is required for the purpose for which it has been collected
- handled according to people's data protection rights
- kept safe and secure
- not transferred outside the UK without adequate protection

Identifying and considering the type of activity or event is an important first step in considering and understanding the responsibilities for those involved in relation to filming or taking photographs. Having identified the type of activity or event it is important to make a list of what will happen during the event and who will be present. It is also important to consider not just the likely presence of cameras but also of mobile phones, tablets and video enabled devices. Careful consideration needs to be given to the taking of images by children and adults at risk. This is very much part of current practice, and the use of such images is widespread. It is therefore important to make explicit to children how the taking of images is to be dealt with. Children are used to adhering to the policies in place in schools and other organisations and will expect the church to be equally explicit about what is allowed.

## Consent for the taking of images

Explicit written consent of the parent/guardian **must** be obtained prior to filming or taking a photograph of a child during church activities. The [Consent Form for Taking and Using Images](#) must be completed explaining the purpose for making the film/taking the photograph e.g., for the church website, information boards, the press etc. and must be signed by the parent and the child (where they are of an age to consent). The consent form must state what the photo is to be used for and once used for the stated purpose it will be destroyed. Parents/guardians/carers should be encouraged to let the organisation know if they do not want their child photographed or filmed.

Appropriate records must be kept of the consent given and that consent should be renewed yearly. Please refer to the [List of Names for Risk Assessment](#) to be used to create a schedule of names of children and associated safeguarding consents. This should accompany and link to the risk assessment for the event'.

Parents and carers are permitted to withdraw their consent at any time. If consent is given for a specific purpose e.g., use on parish web site, further permission must be obtained if it is intended to use the image for a different purpose e.g., annual reports.

Written consent is not required for the use of photographs of adults. However, everyone should be given the choice to stand out of the photo and the names of those who decline to be in the photo must be recorded.

When images are taken, sensitivity, care, and consideration as to how they will be used is important. The following good practice should be followed:

- ensure that when taking an image, a dated record is kept of the service/event and the person(s) to whom the image relates.
- use group photographs rather than an image of an individual whenever possible.
- do not take images of children or adults at risk who are not suitably dressed. If for example the image is of a swimming activity the focus should be on the activity as a whole and not on individuals.
- all images taken need to be checked that appropriate consent has been obtained and if there is any doubt the image needs to be deleted or destroyed.

The responsibility rests on the PCC/MAC for any church-initiated activity or functions. For private functions the responsibility rests with the organizer of that event.

### Using and storing images

It is a criminal offence to possess, take or permit to be taken, make, distribute, or show any indecent photographs or pseudo-photographs of a child.

The following must be considered with regard to the storage and use of images:

- photograph/film of the child/children should not be placed on a website or shared on social media without the written consent of the parent or care.
- when using images of children for publicity purposes or press publication the child's name or other identifying information should not be included. If names are to be published, they should only be published after the written consent to do so from their parent or legal guardian has been obtained. There will be some obvious exceptions such as celebrating an award or achievements, but written permission must always be obtained first.
- take particular care with digital images and be aware that in the wrong hands, these can be manipulated for child abuse images.
- photographs of children must be stored in a secure place.
- The PCC/MAC should consider how and where images are to be stored to meet the requirements of this guidance.
- workers must not store images taken in relation to their Church in Wales role on their personal phones, i-pads, tablets, laptops, computers etc. Where there is no option to store images/videos on a Church in Wales computer then it is the responsibility of the photographer and event leader to ensure images/videos are stored on an encrypted memory stick. It is the expectation that this memory stick is kept in a locked place on Church in Wales property.
- whenever possible each child photographed should be part of a group.
- only use images of children in suitable clothing for the photograph. This is to protect the dignity of the child and to reduce the risk of inappropriate use. In addition, please refer to the requirement for consent within this section.

- the image must be securely stored and disposed of/deleted when no longer required.
- photographs, digital images and film (referred to as images) are all classed as personal data. As such this data is subject to the Data Protection Act 2018 Further information on the Act can be found by contacting the Information Commissioner's Office: Wales Office wales@ico.org.uk.
- for all Provincial Events and residential events, the Director of Communications or person responsible for the event communications, must be given copies of consent forms and are briefed about any children not to be identified. This may include not being named, photographed, videoed and/or interviewed and being explicit about who this is and steps to manage their participation.

A candid photo which identifies a child and links them to the Church in Wales requires explicit consent. Wherever possible a photographer acting on behalf of the Church in Wales should identify themselves as such to those attending a Church event/activity and allow people to step out of any candid shots if they choose.

## Residential events

Any residential event organized for children will involve taking responsibility for their well-being, being prepared for any eventuality, anticipating situations where there is possible risk and taking steps to reduce, remove, avoid and manage risk. All events must have an identified leader and a named person with designated responsibility for safeguarding. Planning for all residential events should include event leaders, Safeguarding Officer, Health and Safety Officer, Media Officer. Prior to any such event taking place *Application for Approval of Activities* must be completed. Before any residential event takes place, the leader must carry out a formal risk assessment of the venue and activities with reference to the Church in Wales's health and safety guidelines. Consent forms signed by the person with parental responsibility must be obtained for each child attending the event and this must detail the nature of the activities in which the child will be engaging. This is *Consent for Specific Activities*. A final meeting should be held at least 4-5 working days prior to all events to finalise arrangements. It is expected that completed *Stay Safe forms* are used to support the final meeting along with all completed risk assessments (*Risk Assessment Template*).

Forms must be filed securely in accordance with data protection and record-keeping policies and procedures. All consent forms must be submitted to the incumbent/priest in charge together with a completed risk assessment and *Application for Approval of Activities*. All forms must be fully completed and stored securely. The responsibility for this rests with the designated leader of the event. The incumbent or priest in charge should counter-sign the *Application for Approval of Activities* to acknowledge receipt.

Everyone involved in running the event, including parent volunteers, must comply with the Church in Wales safeguarding policy and associated guidance. All adults and children participating in the event must know how to report a safeguarding concern to the named person with designated responsibility for safeguarding.



## Safeguarding Children in Specific Circumstances

There are many activities within the church where children are involved in activities that are not solely provided for young people and are not necessarily led by individuals who have training in working with children. This might include children being involved in choirs or bellringing, informal activities or acting as altar servers in the church.

### Church and cathedral choirs with children

Children who participate in church or cathedral choirs have significant contact with adults, including during practice sessions, concerts, visits, and tours. Much of this activity occurs in a relaxed and informal atmosphere but staff and volunteers working and associating with children in the context of church or cathedral choirs where children are present should be aware that safeguarding is paramount. Staff and volunteers in church music departments should interact appropriately with children in order to maintain healthy and unambiguous relationships and avoid situations which may be misinterpreted or misused. It is essential that staff and volunteers follow the Church in Wales safeguarding policy and associated guidance to protect children and adults at risk and avoid putting themselves at risk. Everyone involved in church music should comply with the Church in Wales safeguarding policy and guidance, including clergy, organists, choir leaders, singing teachers, chaperones, parent helpers, lay clerks and adult members of the choir, whether or not they have direct responsibility for the choristers. Further guidance can be found in *Church Choirs with Children Code of Practice for Staff and Volunteers*.

### Young Helpers

Young People can be a valuable asset to our church community. They often have time available to serve the Church and are engaged with other schemes like Duke of Edinburgh Scheme, that requires them to engage in voluntary work. It is appropriate for Churches to use young people in a voluntary capacity, as long as guidelines around this are followed. In law, young helpers under the age of 18 are children and cannot be treated as adult members of a team. Young helpers must always be closely supervised by an adult leader and never given sole responsibility for a group of children. When considering ratios of staff to children, young helpers need to be counted as children, not leaders.

The Church In Wales safeguarding procedures apply to a young helper just as they do to any other person.

Parent / carer permission must to be sought for young helpers to engage in volunteering. Anyone over the age of 18 is an adult and are classed as a leader like any other adult leader. It is good practice for a young helper to be at least two school years older than the group they are helping with.

#### Safe Recruitment of Young Helpers

Under 18's do not require a DBS check but it can be appropriate to ask them to complete an application form (Form J) and to take up some references (form K), especially if they are not well known to you.

#### Training of Young Helpers

It is helpful if they can undertake module A Safeguarding Awareness training (online module), either with a parent or an adult leader with them to discuss and answer questions. We do not require people under 18 to do module B.

It will also be important for the main leader of the activity to discuss with the young person the voluntary helping role they are taking on, including the expectations and boundaries of the role.

## Bell ringers

Bellringers must adhere to the principles of good practice set out in this guidance. The tower captain should be compliant with safer recruitment and have a current criminal record disclosure certificate. The tower captain will take responsibility for the safety and well-being of all children in the bell ringing team both at services and practices. All adults involved in bellringing should be aware of safeguarding risks and know how to respond to safeguarding concerns. The tower captain must know how to report safeguarding concerns to a Provincial Safeguarding Officer.

## Concerts, tours, visits, off-site activities, and social events

When church activities occur away from the church, clergy, church officers and volunteers should adhere to the same standards of conduct and behaviour expected for activities taking place in the church, even in situations where they are 'off-duty' but in the presence of children. Adults should consider how their deportment and conversation may be perceived by children and understand that they may be held up as role models.

There are a number of social events in any church calendar. Adults should be aware that the more relaxed relationships that may sometimes be appropriate in these contexts can be misinterpreted by children. It is important to emphasise that the standards of conduct and behaviour around children should be no different from those in other church activities. Adults should be aware of the particular care which should be taken with older, more mature children in these circumstances.

## Altar Servers

Children engaged as altar servers spend significant time with adults, engaged in activities usually reserved for adults but it is important to remember that they remain children, despite the additional responsibility, and should not be treated differently to other children. This principle applies to all child altar servers, including those aged sixteen or seventeen who might demonstrate increasing maturity but should not be treated as equals by adults in positions of trust. It is particularly important to be aware of situations where child altar servers perform their duties alongside young adult servers who might not be much older than them and to ensure that appropriate boundaries are maintained at all times. Young adult servers should be made aware of their responsibility to safeguard and protect their younger server colleagues. Care should be taken to avoid situations where a child server is alone with a cleric or another adult or child server in the vestry and additional safeguards should be taken where this cannot be avoided, such as leaving doors open or letting other nearby trusted adults know. Child altar servers should know how to report anything that concerns them and be given regular opportunities to discuss their role with more than one trusted adult.

## Safeguarding Specific to Ministry

(Guidance provided by Archbishop Andrew John)

### **Introduction**

Ministry describes the activity of laypeople and clergy whose actions, authorized and recognized by the church, express the work and values of the Kingdom of God (Romans 12:6). This activity both nurtures the inner life of the church and reaches out in loving service to the world. It is essential that this ministry is authentic, creating and sustaining a safe environment that promotes wellbeing and helps all to grow in their Christian faith. The relationship between a person exercising any form of ministry and those to whom they are ministering is one of trust. It exists within clear and necessary boundaries, and this confers a particular duty of care to ensure that everyone remains safe. When trust is abused, the damage that is done to individuals, congregations and wider community is devastating. The best interests and welfare of a child or adult at risk must always be at the heart of ministry and be exercised in a way that protects and safeguards their wellbeing. When working with children and adults at risk, particular care must be taken to ensure that relationships are safely managed and the responsibility for this lies with the minister who is in a position of authority.

### **Ministry of prayer with children and adults at risk**

The offering of prayer is a valued and distinctive feature of Christian life and worship (Acts 2:42). Intercessions are offered on behalf of the church and the world each Sunday. However, prayer can also be offered to individuals more personally. At all times, the protection and care of all who receive this ministry should be paramount. Praying with children or adults at risk must be offered only by those who are authorised by the church following appropriate training and the completion of necessary safer recruitment checks.

### **Individual counselling**

Counselling allows individuals and groups to reflect on their experiences in life and journey towards wholeness. Jesus promised fullness of life (John 10:10) but this is often a journey which requires the help and guidance of others. This ministry should be offered only by those who are trained and authorised by the church to work as counsellors. Counselling should be part of wider pastoral care being offered, where appropriate, in consultation with medical advisors.

### **Personal relationships**

Particular care must be exercised and clear boundaries maintained when ministering to people where there is a close personal relationship. Clerics and ministers should be aware of the possibility of dependency in pastoral relationships and seek advice and supervision when these situations arise. Clerics and ministers should avoid behaviour that could give the impression of inappropriate special relationships. Concerns about the relationship between a minister and child or adult at risk should be discussed with a Provincial Safeguarding Officer.

## **Ministry of deliverance**

Deliverance is a specialist ministry and should be exercised only by those specifically authorised for this ministry by the bishop and enquiries should be referred only to the diocesan deliverance ministry advisors. Clergy and others who receive requests for the ministry of deliverance should explain that such ministry can only be provided by those authorised and, with the permission of the individual(s) concerned, should refer the matter to the Diocesan Deliverance team. All necessary steps must be taken to ensure the safety of those receiving deliverance ministry. This must be done following the Church in Wales safeguarding policy and best practice for children and adults at risk. It is essential that everyone understands what is being provided and what the ministry involves. The advisors' special expertise should be used in order to help as effectively as possible but can only be administered with the knowledge and authority of the Diocesan Bishop. Advisors should consider all deliverance enquiries within the wider context of well-being, including mental health and safeguarding and discuss any required safeguarding information and referrals with a Provincial Safeguarding Officer. Requests for the ministry of deliverance vary significantly in nature and complexity. Careful discernment is needed as there may be issues relating to mental or physical health instead or alongside a deeper spiritual problem.

Exorcism is clearly described in the gospels as an inherent part of Jesus' ministry (e.g. Matthew 4:24; 8:16; 8:32; 9:33-4) and he commands his disciples to do likewise (Matthew 7:22; 10:8 etc). However, with the insights of modern medicine and psychiatry we understand that what has been understood to be a spiritual problem may be an illness such as epilepsy. It is vital that Church ensures the ministry of exorcism happens under strict conditions which honour the dignity and well-being of all concerned.

If there is a request for exorcism, the matter must be referred to the diocesan bishop and s/he alone can authorise such ministry, following a thorough investigation of the circumstances and with the advice of deliverance specialists. Such permission must be sought every time an exorcism is requested. There is no 'general permission' to undertake such ministry.

## **Ministry of healing**

The ministry of healing is a Biblical and treasured ministry of the church (James 5:14) and one exercised by Jesus himself. General prayers for healing are offered during worship but the specific ministry of healing and/or anointing to individuals requires sensitivity. It is essential that ministers are appropriately authorised, complete necessary safeguarding training and follow the Church in Wales safeguarding policies.

If there are concerns about boundaries, physical contact or matters which arise during the prayers for healing, these should be discussed with the Ministry Area Leader who will be able to consult the Provincial Safeguarding Team

## **The Ministry of Reconciliation**

The Ministry of Reconciliation can only be exercised by bishops and priests. Any concerns or allegations of a safeguarding nature raised in the seal of confession should be raised with the safeguarding team. The Church in Wales Professional Ministerial Guidelines paragraphs 7.3 and 7.4 state:

“Where abuse of children or vulnerable adults is admitted in the context of confession, the cleric should urge the person to report his or her behaviour to the police or social services, and should also make this a condition of absolution, or withhold absolution until this evidence of repentance has been demonstrated. If a penitent’s behaviour gravely threatens his or her own well-being or that of others, particularly children or adults at risk, the cleric should insist upon action on the penitent’s part.”

### **Victims and Survivors of non-recent abuse in childhood**

Clerics and those offering pastoral care in the church may find themselves hearing disclosures of abuse that happened to an adult in childhood. The abuse may have occurred at any point during the adult's childhood and allegations of non-recent abuse should be treated in the same way as contemporary allegations. There is no time limit on reporting alleged offences of abuse and the disclosure must be referred to a Provincial Safeguarding Officer. Where possible, the limits of confidentiality should be described at the outset and, at the time of any disclosure, the circumstances in which information will be shared with a Provincial Safeguarding Officer also made clear. This includes explaining that some information may need to be shared with statutory authorities even without the consent of the adult. This may also include referrals where the adult wishes to remain anonymous. The wishes of the person disclosing abuse will be very important and for some adults just being able to talk to a trusted person about the experiences can be a powerful healing event. However, an alleged perpetrator of non-recent abuse against a child or children could still be abusing children and there is potential to protect children from the risk of further harm and abuse. It is very difficult for adults to talk about the abuse they experienced as a child, and it takes courage to come forward and share their story. While it is important to continue to support an adult who has made a disclosure of non-recent abuse, decisions regarding a referral to the statutory authorities must be taken in a timescale that protects children. Breaching confidentiality to report a disclosure of abuse in childhood is not a breach of trust.

### **Forgiveness**

Forgiveness is a gift from God (Col. 1:14) and brings us to a deeper experience of God’s love. It is also a complex issue especially for those who have been abused. Survivors or victims of abuse ought not to be urged to forgive unconditionally when they are not able to make this decision. The dynamics of power in pastoral encounters must be acknowledged so that survivors or victims do not feel disempowered and unable therefore to reflect on their experiences. It is therefore inappropriate to suggest to a victim or survivor of abuse that they have failed if they do not forgive their abuser or that their progress will be impaired or imperilled. Forgiveness is a deeply personal matter. For some, it will be an important aspect of their healing and will bring peace and closure. For others, it might be judged either

unnecessary or even inappropriate because the abuser has not shown remorse. Everyone will need to journey at their own pace and in a way which is manageable. The question of forgiveness is one which a victim or survivor may wish to explore in conversation with a Christian skilled in listening and pastoral care. The Church in Wales is able to provide such support, but no victim or survivor should be made to feel that this is necessary.

Care must be taken to ensure that the victim or survivor feels welcome and supported in their church, particularly when the harm or abuse they experienced is known within the congregation, perhaps following the arrest of an abuser. It is essential that the church community does not speculate on the abuse or in any way blame the victim or survivor for speaking out about their experience.

The church is called to provide a safe space in which people can discover peace, acceptance and a loving welcome.

### **Conclusions**

The Church is called to follow Jesus Christ and to model his life in its ministry. The protection of those who are vulnerable is inherent to this call. We must give expression to this general requirement in specific ways: the boundaries we maintain, the respect and dignity we offer, the policies which protect and the penalties which are necessary to enforce our regulations. Our hope and goal is that our ministry will bring wholeness to survivors and that the safety of everyone becomes normal. It is essential that we create a church in which everyone is safe from harm and where lessons are learned continuously and when we fail, we acknowledge this quickly and openly.